UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA,	**Case No.: 24-4419**
Plaintiff-Appellee	**APPELLANT'S AMENDED PRO SE SUPPLEMENTAL BRIEF (Amendment to ECF No. 32-1 only; Exhibits A - M Remain the Same as filed in ECF No. 32-2)**
v.	
STEVEN CLARK LEFEMINE,	
Defendant-Appellant	

APPELLANT'S AMENDED PRO SE SUPPLEMENTAL BRIEF

COMES NOW Appellant, Steven Clark Lefemine, and respectfully submits this Amended Pro Se Supplemental Brief, accompanied by antecedent Motion for Leave to File Amended Pro Se Supplemental Brief, consequent to the Court's Order (ECF No. 28, January 15, 2025).

Appellant is 69 year old male who has lived in South Carolina since August 1982. The most important defining factor of Steve Lefemine's life today is his Christian faith. By the grace and mercy of God, He drew me to faith in the Lord Jesus Christ and He has forgiven me of all my sin. I am a saved, born-again Christian by grace alone, through faith alone, in the Lord Jesus Christ Alone. I believe the Word of God. Jesus Christ is my Lord and Saviour.

APPELLANT'S STATEMENT OF ISSUES ON APPEAL

The District Court rendered an unjust verdict and sentence during appellant's FACE Act prosecution.

1. **God's Law is the rightful, just basis for man's law**
2. **Human life begins at conception; A human being exists at conception**
3. **Every human being has a Creator God-given, inherent, unalienable right to life as a natural "person" which should rightly be recognized in law as legal personhood**
4. **As stated by Virginia Delegate George Mason in the 1787 Constitutional Convention: "By an inevitable chain of causes and effects, Providence punishes national sins by national calamities."**
5. **The origin of the FACE Act was to protect the so-called "right" to "abortion"; after *Dobbs*, there is no federal constitutional right to "abortion"; federal FACE Act should be overturned**
6. **The application of the FACE Act in this case was inconsistent with Congress' findings and intent**
7. **United States District Judge Laplante Order Granting Petitioner's Motion For Provisional Class Certification of "future persons" for purpose of (nationwide) preliminary injunctive relief in "Barbara," et al. v. Donald J. Trump, President of the United States, in his official capacity, et al., Civil No. 25-cv-244-JL-AJ (ECF No. 63), District of New Hampshire, July 10, 2025**
8. **The required written "human being advisory" within South Dakota House Bill 1166 enacted in 2005 was upheld by the 8th Circuit Court of Appeals in Planned Parenthood Minnesota, et al v. Mike Rounds, et al, No. 09-3362 (8th Cir. 2011), Filed: September 2, 2011**

1. God's Law is the rightful, just basis for man's law

By information, research, and faith, I believe God's Law is the rightful, just basis for man's law; that is, God's Law in nature, and God's Law in revelation. America's past historical record documents the legacy of the core of most of America's founding legal heritage to be consistent with this truth, with the great notable and tragic exception of unbiblical American Slavery, for which national sin America has paid greatly. The truth of God's Law being the rightful basis for man's law undergirds Appellant's principled belief that the prosecution and judgment in this case (CR. NO. 3:23-00117-JFA), were unjust, and therefore justly argues for reversal of Appellant's conviction and for case dismissal by this Court.

This view that the rightful, just basis for man's law is God's Law is absolutely not only the individual "religious" belief of the Appellant. The historical and legal record contains abundant evidence this was the predominant American view for generations, including as witnessed in the very first sentence of our country's 1776 Declaration of Independence, i.e., "the thirteen united States of America" declaring the justification of their right to independence: "... to assume among the powers of the earth, the separate and equal station to which **the Laws of Nature and of Nature's God** entitles them, ...". [emphasis added]

Today, the 1776 Declaration of Independence is one of the Organic Laws of the United States, and is found and identified as such, at the beginning of the United States Code of Laws [Exhibit A, Source: Coleman Karesh Law Library, University of South Carolina, Columbia, South Carolina].

Furthermore, the second sentence of the 1776 Declaration affirms the "self-evident" truth of Creator-endowed unalienable Rights, the first of which is the Right to Life:

> "We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness."

So the view that these certain Rights come from the Creator and are unalienable, is absolutely not only the individual "religious" belief of the Appellant, but is written into America's founding document, one of the Organic Laws of the United States of America, the 1776 Declaration of Independence. Any legal presumption contrary to this historical fact and "self-evident" truth is erroneous, false, and un-American.

In the 2022 United States Supreme Court *Dobbs* Opinion (597 U.S. 215), William Blackstone is cited numerous times [Exhibit F, excerpted pages 217, 238, 242, 243, 244, 245, 247, 251, 272]. In the *Dobbs* Syllabus, Blackstone is named among those "great common-law authorities" [Exhibit F, page 217]. This Opinion refers to his seminal work published in the 1760's decade prior to the American Revolution,

Commentaries on the Laws of England. While the *Dobbs* Opinion is referring to Blackstone's writings in the "abortion" context, the intent for purposes of this Memorandum is more fundamental: What is Law ? Where and from Whom does Law rightly come from ? What is Law rightly based upon ? Answers to these questions have direct bearing on the case, *Lefemine v. USA,* CR. NO. 3:23-00117-JFA, and this appeal.

The Appellant cites excerpts from William Blackstone's *Commentaries on the Laws of England,* INTRODUCTION, Section 2: Of the Nature of Laws in General [Exhibit B], as follows:

[https://lonang.com/wp-content/download/Blackstone-CommentariesBk1.pdf - pages 25 - 27]

"The doctrines thus delivered we call the revealed or divine law, and they are to be found only in the holy scriptures." [p.27] [emphasis added]

"Upon these two foundations, the law of nature and the law of revelation, depend all human laws; that is to say, no human laws should be suffered to contradict these." [p.27] [emphasis added]

"To instance in the case of murder; this is expressly forbidden by the divine, and demonstrably by the natural law; and from these prohibitions arises the true unlawfulness of this crime. Those human laws that annex a punishment to it, do not at all increase its moral guilt, or superadd any fresh obligation *in foro conscientiae* [in the court of conscience] to abstain from its perpetration. Nay, if any human law should allow or enjoin us to commit it, we are bound to transgress that human law, or else we must offend both the natural and the divine." [p.27] [emphasis added]

Such as in the case with **"abortion"** itself, which is **child-murder.** And such as in the case of **the unjust, unrighteous** 1994 F.A.C.E. Law (Title 18 U.S.C. Section 248), which protects child-murder.

Isaiah 10:1,2 KJV:

> "Woe unto them that decree unrighteous decrees, and that write grievousness *which* they have prescribed; To turn aside the needy from judgment, and to take away the right from the poor of my people, that widows may be their prey, and *that* they may rob the fatherless!"

Blackstone's instruction on "the Nature of Laws in General" is that all human laws rightly depend upon these two foundations: "the law of nature and the law of revelation". He states previously "the revealed or divine law" is "to be found only in the holy scriptures."

God's Word says, "Thou shalt not kill (murder)." Exodus 20:13, KJV. The Lord Jesus Christ says, "Thou shalt do no murder." Matthew 19:18, KJV. The Appellant believes "abortion" is murder and that God commands all men everywhere not to commit it. The Bible says "Man (Gr. *anthropos*) shall not live by bread alone, but by every word that proceedeth out of the mouth of God." Matthew 4:4, KJV. Surely America would be safer if more people obeyed the Sixth Commandment of the Ten Commandments.

Blackstone's *Commentaries* were used before, and for approximately 100 years after, the American Revolution (1775-1783) to train lawyers in the United States, including at the University of South Carolina School of Law, Columbia, SC during part (1867-1877) of the Reconstruction Era after the USC Law School opened in 1867 [Exhibit C; History of the USC Law School was prepared by a former Associate Director for Administration of the Coleman Koresh Law Library, University of South Carolina, Columbia, SC. Included in this history is documentation of the use of Blackstone's *Commentaries* as part of the USC Law School Curriculum during at least two administrations during the Reconstruction Era. - https://christianlifeandliberty.net/USC-Law-School-History-Narrative-received-from-Coleman-Karesh-Law-Library-USC-School-of-Law-Feb-4-2016.pdf - pages 1, 2]

The United States Supreme Court Opinion, *Rector, Etc., of Holy Trinity Church v. United States.* (143 U.S. 457) is dated February 29, 1892. It recites and documents many examples of the Christian roots of America, beginning at Section 11 of the Opinion, located on page 7 of Exhibit D.
[https://www.law.cornell.edu/supremecourt/text/143/457]

This Opinion states, "… no purpose of action against religion can be imputed to any legislation, state or national, because this is a religious people. This is historically true."

Included among the many examples of the Christian religion's influence in this 1892 Opinion of the United States Supreme Court, with illustrative historical details and quotations are:

1) "The first colonial grant" "made to Sir Walter Raleigh in 1584".
2) "The first charter of Virginia, granted by King Charles I" in 1606 (and subsequently in 1609 and 1611).
3) "The celebrated compact made by the [P]ilgrims in the Mayflower" in 1620.
4) "The fundamental orders of Connecticut, under which a provisional government was instituted in 1638-39".
5) The "charter of privileges granted by William Penn to the province of Pennsylvania" in 1701.
6) The "[D]eclaration of [I]ndependence recognizes the presence of the Divine in human affairs in these words: 'We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty, and the pursuit of Happiness.' …"
7) "If we examine the constitutions of the various states, we find in them a constant recognition of religious obligations. Every constitution of every one of the 44 states [this is 1892] contains language which, either directly or by clear implication, recognizes a profound reverence for religion, and an assumption that its influence in all human affairs is essential to the well-being of the community."
   (a) Constitution of Illinois, 1870.
   (b) Constitution of Indiana, 1816.
   (c) Constitution of Maryland, 1867 (Articles 36 and 37 of the Declaration of Rights).
   (d) Constitution of Massachusetts, 1780 (Articles 2 and 3 of Part 1).
   (e) Constitution of Mississippi, 1832 (Sections 5 and 14 of Article 7).
   (f) Constitution of Delaware, 1776 (Article 22).
   (g) Constitution of the United States, 1787.

The Opinion further states, "There is no dissonance in these declarations. There is a universal language pervading them all, having one meaning. They affirm and reaffirm that this is a religious nation. **These are not individual sayings, declarations of private persons. They are organic utterances. They speak the voice of the entire people.**" [emphasis added] [This was written in 1892, about 133 years ago.]

The Opinion lists a number of matters illustrating the influence of Christianity in American life, and then states, "These, and many other matters which might be noticed, add a volume of unofficial declarations to the mass of organic utterances that **this is a Christian nation.**" [emphasis added]

Further, near the conclusion, the Opinion states, "It is the duty of the courts, under those circumstances, to say that, however broad the language of the statute may be, the act, although within the letter, is not within the intention of the legislature, and therefore cannot be within the statute."

2. Human life begins at conception; A human being exists at conception

There are many reasons I believe a living human being exists inside the womb of a pregnant woman, beginning at conception/fertilization: Scriptural; biological, scientific, and medical; and legal.

Starting with Scriptural, for example, Genesis 1:27 says, "So God created man in His own image, in the image of God created He him; male and female created He them." Jeremiah 1:5 begins, "Before I [God] formed thee in the belly I knew thee;…" The Bible uses the Greek word *brephos* translated

"babe" to refer to both a child in the womb (John the Baptist in Luke 1:41, 44) and to a small child in a manger (Jesus Christ in Luke 2:12, 16). In God's eyes, such a child is a babe or *brephos* both inside and outside the womb. [See also Psalm 51:5, KJV.]

Next considering one legal reason, for example. As stated before, our country's 1776 Declaration of Independence is one of the Organic Laws of the United States, seen at the beginning of the United States Code of Laws. The well-known second sentence states, "We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness." So the organic law of the United States says we have a Creator Who has endowed us with the unalienable right to life, among others. It is a right which cannot be taken away unjustly by Government. Since the organic law of the United States declares all men are created equal, and Creator-endowed with certain unalienable rights, among which the first is "Life", then ***personhood for all men*** is inherently recognized by the 1776 Declaration of Independence.

United States Code
Organic Laws
https://uscode.house.gov/browse/frontmatter/organiclaws&edition=prelim

'Declaration of Independence: A Transcription'
National Archives
https://www.archives.gov/founding-docs/declaration-transcript

So then the question is, when does that unalienable Creator-endowed life referred to in the Declaration of Independence begin ? The evidence shows human life begins at fertilization/conception.

In 1981, a U.S. Senate Judiciary Subcommittee conducted eight days of Hearings, and heard 57 witnesses on The Human Life Bill S.158 [https://www.govtrack.us/congress/bills/97/s158/summary], which was federal personhood legislation. The U.S. Senate Judiciary Subcommittee Chairman's Report [16-page extract: http://christianlifeandliberty.net/Human-Life-Bill-S158-REPORT-US-Senate-Judiciary-Subcomm-Hearings-Apr-23-to-Jun-18-1981-16-pages-extract.pdf] [Exhibit E] presented an Amended version of the bill which included Congress finding "that **the life of each human being begins at conception",** and "that for the purpose of enforcing the obligation of the States under the fourteenth amendment not to deprive persons of life without due process of law, **each human life exists from conception",** and "for this purpose "person" includes all human beings." [emphasis added]

The U.S. Senate Judiciary Subcommittee Report further stated: "The purpose of S.158 is first, to recognize **the biological fact** that **the life of each human being begins at conception;**…" [emph. added]

The Report states, "The Declaration of Independence holds that the right to life is a self-evident, inalienable right of every human being. Embodied in the statement that "all men are created equal" is the idea of the intrinsic worth and equal value of every human life. The author of the Declaration, Thomas Jefferson, explained in later years that "[t]he care of human life and happiness, and not their destruction, is the first and only legitimate object of good government."

Over 40 years ago, this 1981 U.S. Senate Judiciary Subcommittee Report answered the scientific question, When does a human life begin, stating in part,

"The testimony of these witnesses and the voluminous submissions received by the Subcommittee demonstrate that contemporary scientific evidence points to a clear conclusion: the life of a human being begins at conception, the time when the process of fertilization is complete." [emphasis added]

[Quotations from Dr. Jerome Lejeune, Dr. Watson Bowes, and Dr. Hymie Gordon, are on page 9 of the Chairman's Subcommittee Report.]

The Report continues, "The scientific consensus on the biological fact of the beginning of each life has existed ever since the medical and scientific communities became aware of the process of conception in the mid-nineteenth century." [emphasis added]

Then on page 13, the Report states, "If the United States government is to give reasonable consideration to the abortion issue it must start from the fact that unborn children are human beings." [emphasis added]

In the few pages provided from the "Mayo Clinic Complete Book of Pregnancy & Baby's First Year" at Exhibit G [Robert V. Johnson, M.D., Editor-in-Chief, Copyright © 1994 by Mayo Foundation for Medical Education and Research], there is biological, scientific, and medical evidence for the humanity of the unborn child in the womb beginning at "the instant of fertilization".

In Part One – Pregnancy, Chapter Three – How Your Baby Develops, on page 27 is stated:

"Whether you will have a boy or girl is determined at the moment your baby is conceived. One pair of the baby's chromosomes, called sex chromosomes, determines its sex. Females have two chromosomes called X chromosomes. In males, the sex chromosomes are different; one is an X and the other is a Y chromosome. It is the presence of this Y chromosome that determines whether the embryo will develop as a male. Eggs contain only X sex chromosomes. Sperm, however, may contain either X or Y sex chromosomes. [emphasis added]

Each month, during your menstrual cycle, a single egg leaves your ovary. This is called ovulation. At the instant of fertilization, sperm and egg join and pool their chromosomes, creating an embryo with a full complement of 23 pairs, or a total of 46 chromosomes. If a sperm containing an X chromosome meets the egg, a female embryo (with two X chromosomes) will result. If a sperm containing a Y chromosome joins the X chromosome in the egg, the embryo will be male. In this way, it is always the father's contribution that determines the sex of the fetus." [emphasis added]

The accompanying color graphic illustration and pictures at Exhibit G are from p. A1 and p. A2 of the same source: the "Mayo Clinic Complete Book of Pregnancy & Baby's First Year". On page A1 is this statement: "Fertilization occurs (3) when one sperm penetrates the covering shell of nutrient cells that make up the wall of the ovum (see enlarged photo at left)." Pictures on p. A2 show embryos at 5 weeks old, 6 weeks old, 9 weeks old (fetus), and 17 weeks old. Embryos are human beings.

Then there is the reprint of Lennart Nilsson's 'Drama of Life Before Birth' Landmark Photo Essay first published in the April 30, 1965 issue of LIFE magazine, included herein as Exhibit H. The article at Exhibit H is not the 1965 LIFE magazine original, but a March 2013 article by Ben Cosgrove posted at both https://www.life.com and at https://time.com (just the first page of the article posted at time.com is included at Exhibit H, to provide the March 4, 2013 date of its publication). The photos of human life in the womb at 3 1/2 weeks, 4 weeks, 5 weeks, 6 weeks, 6 1/2 weeks (2), 8 weeks, 11 weeks, 12 weeks, 16 weeks, 18 weeks, and 28 weeks testify photographically to the life and humanity of the human being growing inside a pregnant woman's womb.

So based upon even a limited sample of Scriptural; biological, scientific, and medical; and legal evidence, I believe a living human being exists inside the wombs of clients who show up for "abortion" appointments at the Columbia Planned Parenthood "abortion" center, which according to SC DHEC statistics destroyed the lives of 1,956 unborn children in CY 2022, and has destroyed over 59,000 unborn children in the 45 years inclusive from 1978 to 2022.

"Abortions" Committed in SC by Facility in 2022 (SC DHEC)
http://christianlifeandliberty.net/2023-08-26-SC-DHEC-Abortions-by-Occurrence-in-SC-2022.pdf

Over 423,000 unborn children were destroyed by "abortion" in South Carolina, 1970 - 2022.

TOTAL REPORTED "ABORTIONS" IN SOUTH CAROLINA:
http://christianlifeandliberty.net/Statistics.htm

3. Every human being has a Creator God-given, inherent, unalienable right to life as a natural "person" which should rightly be recognized in law as legal personhood

Based on science and law, the Appellant believes the human beings living within the wombs of women entering Planned Parenthood for "abortion" appointments are **natural persons,** and ought rightfully to be recognized BY THIS COURT as **legal persons.**

All human beings are **natural persons** by definition. Black's Law Dictionary (Ninth Edition) defines "person" firstly, as "A human being." "Also termed *natural person."* Defendant reasonably believes children living within the wombs of their mothers are natural persons based on his information, belief, and research, and that they ought rightfully to be recognized as **legal persons,** constitutionally protecting their God-given, inherent, unalienable right to life, BY THIS COURT.

Black's Law Dictionary (2009): Person = "A Human Being"
http://christianlifeandliberty.net/2013-12-11-Blacks-Law-Dictionary-2009-Person=A-Human-Being.pdf

---

In *Planned Parenthood South Atlantic, et al. v. State of South Carolina, et al.,* 438 S.C. 188 (2023), South Carolina Supreme Court Justice Few (concurring with the Majority/Lead Opinion) stated:

"In other words, if the State were to pass a total ban on abortion – despite a complete invasion of a pregnant woman's right to privacy – the privacy invasion might be reasonable under article I, section 10, because "human life" has no countervailing interest; human life simply must be preserved."

[emphasis added]

SUPREME COURT OF SOUTH CAROLINA
Opinion No. 28127

Planned Parenthood South Atlantic, et al. v. State of South Carolina, et al.
Heard October 19, 2022 – Filed January 5, 2023

Note: See also p.77 of Exhibit A of ECF No. 77, Motion for Allowance of Defense of Necessity, Re: USA v. Steven Clark Lefemine (3:23-117), for pages 1, 2, 5, 75-81, and 90 of South Carolina Supreme Court Opinion No. 28127

http://christianlifeandliberty.net/SC-Supreme-Court-Opinion-Heartbeat-Law-Jan-5-2023-pages-1-2-5-75-through-81-90.pdf

---

In *James LePage, et al. v. The Center for Reproductive Medicine and Mobile Infirmary Assoc* (2024),

Alabama Supreme Court Justice Mitchell (authoring the Majority Opinion, beginning p. 2), and

Alabama Supreme Court Chief Justice Parker (concurring specially, beginning p. 26), made statements

as follows:

MITCHELL, Justice. [Majority Opinion] [begin p. 2]

"All parties to these cases, like all members of this Court, agree that an unborn child is a genetically unique human being whose life begins at fertilization and ends at death. The parties further agree that an unborn child usually qualifies as a "human life," "human being," or "person," as those words are used in ordinary conversation and in the text of Alabama's wrongful-death statutes. That is true, as everyone acknowledges, throughout all stages of an unborn child's development, regardless of viability." [p. 8] [emphasis added]

"And Blackstone's Commentaries, the leading authority on the common law, expressly grouped the rights of unborn children with the "Rights of Persons," consistently described unborn children as "infant[s]" or "child[ren]," and spoke of such children as sharing in the same right to life that is "inherent by nature in every individual." 1 William Blackstone, Commentaries on the Laws of England 125-26. [fn. 6] Those expressions are in keeping with the United States Supreme Court's recent observation that, even as far back as the 18th century, the unborn were widely recognized as living persons with rights and interests. See Dobbs v. Jackson Women's Health Org., 597 U.S. 215, 246-48 (2022)." [pp. 13-15]

PARKER, Chief Justice (concurring specially). [begin p. 26]

In his Commentaries on the Laws of England, Sir William Blackstone declared that "[l]ife is the immediate gift of God, a right inherent by nature in every individual."12 [p. 30]

---

11 Accord the philosophy of the United States of America as expressed in the Declaration of Independence -- "endowed by their Creator with certain unalienable Rights, that among these are Life …."
The Declaration of Independence para. 2 (U.S. 1776). [p. 30]

" … the principle itself -- that human life is fundamentally distinct from other forms of life and cannot be taken intentionally without justification -- has deep roots that reach back to the creation of man "in the image of God." Genesis 1:27 (King James)." [p. 33]

"… the Geneva Bible, which was the "most popular book in colonial homes,"15 includes a footnote to Genesis 9:6 that provides: "Therefore to kill man is to deface God's image, and so injury is not only done to man, but also to God." Genesis 9:6 n.2 (Geneva Bible 1599)." [p. 36]

"Finally, the doctrine of the sanctity of life is rooted in the Sixth Commandment: ["Thou shalt not kill (murder)." Exodus 20:13 (King James)]." [p. 36]

"In summary, the theologically based view of the sanctity of life adopted by the People of Alabama encompasses the following: (1) God made every person in His image; (2) each person therefore has a value that far exceeds the ability of human beings to calculate; and (3) human life cannot be wrongfully destroyed without incurring the wrath of a holy God, who views the destruction of His image as an affront to Himself. [Alabama State Constitution] Section 36.06 recognizes that this is true of unborn human life no less than it is of all other human life -- that even before birth, all human beings bear the image of God, and their lives cannot be destroyed without effacing his glory." [pp. 37-38]

"Section 36.06 provides, in relevant part:

> "(a) This state acknowledges, declares, and affirms that it is the public policy of this state to recognize and support the sanctity of unborn life and the rights of unborn children, including the right to life.
>
> "(b) This state further acknowledges, declares, and affirms that it is the public policy of this state to ensure the protection of the rights of the unborn child in all manners and measures lawful and appropriate." " [p. 38]

"The People of Alabama have declared the public policy of this State to be that unborn human life is sacred. We believe that each human being, from the moment of conception, is made in the image of God, created by Him to reflect His likeness. It is as if the People of Alabama took what was spoken of the prophet Jeremiah and applied it to every unborn person in this state: ["Before I formed thee in the belly I knew thee; and before thou camest forth out of the womb I sanctified thee,…" Jeremiah 1:5 (King James).] All three branches of government are subject to a constitutional mandate to treat each unborn human life with reverence. Carving out an exception for the people in this case, small as they were, would be unacceptable to the People of this State, who have required us to treat every human being in accordance with the fear of a holy God who made them in His image. For these reasons, and for the reasons stated in the main opinion, I concur." [p. 48]

SUPREME COURT OF ALABAMA
OCTOBER TERM, 2023-2024
SC-2022-0515

James LePage, et al. v. The Center for Reproductive Medicine and Mobile Infirmary Association
February 16, 2024

https://judicial.alabama.gov/appellate/supremecourt

https://publicportal-api.alappeals.gov/courts/68f021c4-6a44-4735-9a76-5360b2e8af13/cms/case/343D203A-B13D-463A-8176-C46E3AE4F695/docketentrydocuments/E3D95592-3CBE-4384-AFA6-063D4595AA1D

Note: The quotes above from Alabama Supreme Court Justice Mitchell and Chief Justice Parker may be seen as cited in the excerpted pages of the *James LePage, et al.* Opinion at Exhibit J, except for page 37.

In *Advisory Opinion to the Attorney General Re: Limiting Government Interference With Abortion*, No. SC2023-1392 (2024), Florida Supreme Court Justice Francis (dissents with an opinion) stated: "The exercise of a "right" to an abortion literally results in a devastating infringement on the right of another person: the right to life. And our Florida Constitution recognizes that "life" is a "basic right" for "[a]ll natural persons." Art. I, § 2, Fla. Const. One must recognize the unborn's competing right to life and the State's moral duty to protect that life." [emphasis added]

https://supremecourt.flcourts.gov/content/download/2285282/opinion/Opinion_SC2023-1392.pdf

Note: The quote above from Florida Supreme Court Justice Francis may be seen in the excerpted p. 59 from the *Advisory Opinion to the Attorney General, etc.* Opinion included at Exhibit K.

The preceding quotes from various State Supreme Court Opinions from South Carolina (2023), Alabama (2024), and Florida (2024) are all from recent, post-*Dobbs* (2022) writings of justices on those State Supreme Courts, three writing in the Majority (SC (1) and ALA (2)), and one writing in Dissent (FL).

However, as the 1981 U.S. Senate Judiciary Subcommittee Chairman's Report on Hearings conducted on The Human Life Bill S.158 [https://www.govtrack.us/congress/bills/97/s158/summary] (which was federal personhood legislation) demonstrates, efforts at the federal level to establish in law the legal personhood of human beings beginning at conception goes back at least well over 40 years.

[16-page extract: http://christianlifeandliberty.net/Human-Life-Bill-S158-REPORT-US-Senate-Judiciary-Subcomm-Hearings-Apr-23-to-Jun-18-1981-16-pages-extract.pdf] [Exhibit E]

In addition to S.158 in the 97th Congress, the 40th President of the United States, Ronald Reagan, made an official Proclamation (5761) which declared **"the unalienable personhood of every American, from the moment of conception until natural death"** for **National Sanctity of Human Life Day, 1988,** dated **January 14, 1988.** [emphasis added]

Ronald Reagan
40th President of the United States: 1981 - 1989
Proclamation 5761 — National Sanctity of Human Life Day, 1988
January 14, 1988
https://www.presidency.ucsb.edu/documents/proclamation-5761-national-sanctity-human-life-day-1988

By the President of the United States of America

A Proclamation [Excerpts]

"America has given a great gift to the world, a gift that drew upon the accumulated wisdom derived from centuries of experiments in self-government, a gift that has irrevocably changed humanity's future. Our gift is twofold: the declaration, as a cardinal principle of all just law, of the **God-given, unalienable rights** possessed by every human being; and the example of our determination to secure those rights and to defend them against every challenge through the generations. Our declaration and defense of our rights have made us and kept us free and have sent a tide of hope and inspiration around the globe."

"One of those **unalienable rights,** as the **Declaration of Independence** affirms so eloquently, is **the right to life."**

"The **unalienable right to life** is found not only in the **Declaration of Independence** but also in the **Constitution** that every President is sworn to preserve, protect, and defend. **Both the Fifth and Fourteenth Amendments guarantee that no person shall be deprived of life without due process of law."**

"Now, Therefore, I, Ronald Reagan, President of the United States of America, by virtue of the authority vested in me by the Constitution and laws of the United States, **do hereby proclaim and declare the unalienable personhood of every American, from the moment of conception until natural death, …"**
[emphasis added]

Ronald Reagan
Presidential Library & Museum
Proclamation 5761 -- National Sanctity of Human Life Day, 1988
January 14, 1988
By the President of the United States of America
A Proclamation
https://www.reaganlibrary.gov/archives/speech/proclamation-5761-national-sanctity-human-life-day-1988

PRESIDENT RONALD REAGAN'S PROCLAMATION 5761 OF JAN. 14, 1988 - 102 STAT. 4947 – NATIONAL SANCTITY OF HUMAN LIFE DAY, 1988

[https://www.govinfo.gov/content/pkg/STATUTE-102/pdf/STATUTE-102-Pg4947.pdf]

Note: This https://www.govinfo.gov version of President Ronald Reagan's Proclamation 5761 of Jan. 14, 1988 – 102 STAT. 4947 is included at Exhibit L.

Returning back in time over 230 years to 1791, and the Ratification of the Bill of Rights (George Mason is known as the "Father of the Bill of Rights"), the 5th Amendment guarantees the federal government's protection of the right to life of persons:

Constitution of the United States, Fifth Amendment
https://constitution.congress.gov/constitution/amendment-5/
"No person shall …be deprived of life, liberty, or property, without due process of law; …"

Returning back in time over 150 years to 1868, and the Ratification of the 14th Amendment, the protection of the right to life of persons by the States is constitutionally guaranteed:

Constitution of the United States, Fourteenth Amendment
Section 1
https://constitution.congress.gov/constitution/amendment-14/
"…nor shall any State deprive any person of life, liberty, or property, without due process of law;…"

In the Constitution of the State of South Carolina, the protection of the right to life of persons is guaranteed in Article I, Section 3:

Constitution of South Carolina
ARTICLE I - DECLARATION OF RIGHTS
https://www.scstatehouse.gov/scconstitution/A01.pdf
SECTION 3. – "…nor shall any person be deprived of life, liberty, or property without due process of law, nor shall any person be denied the equal protection of the laws."

So the 5th and 14th Amendments to the U.S. Constitution guarantee that no person shall be deprived of life, liberty, or property without due process of law; and Article I, Section 3. of the South Carolina State Constitution guarantees the same.

Based on science and law, the Appellant believes the human beings living within the wombs of women entering Planned Parenthood for "abortion" appointments are **natural persons,** and ought rightfully to be recognized BY THIS COURT as **legal persons.**

All human beings are **natural persons** by definition. Black's Law Dictionary (Ninth Edition) defines "person" firstly, as "A human being." "Also termed *natural person."* Appellant reasonably believes children living within the wombs of their mothers are natural persons based on his information, belief, and research, and that they ought rightfully to be recognized as **legal persons,** constitutionally protecting their God-given, inherent, unalienable right to life, BY THIS COURT.

Black's Law Dictionary (2009): Person = "A Human Being"
http://christianlifeandliberty.net/2013-12-11-Blacks-Law-Dictionary-2009-Person=A-Human-Being.pdf

---

The action taken by the Appellant on November 15, 2022 to interpose between human beings in the womb and those inside the Planned Parenthood "abortion" center who would destroy them, was justified to make an attempt, however weak and of short duration, to prevent the atrocity and abomination of the murder of judicially innocent children inside the wombs of their mothers.

Photographic evidence of the nature of the crimes against humanity committed by those employed at Planned Parenthood in the practice of destroying human beings inside the wombs of their mothers is available by viewing the horrific copyrighted photographs at this website:

'Abortion photos – the victims speak'
https://abortionno.org/abortion-photos/

In addition, 17 of those photos at the https://abortionno.org/abortion-photos/ website have been printed out and provided at Exhibit I of this Amended Pro Se Supplemental Brief.

---

4. As stated by Virginia Delegate George Mason in the 1787 Constitutional Convention: "By an inevitable chain of causes and effects, Providence punishes national sins by national calamities."

In late 1988 I went a couple of times to Atlanta, Georgia where a national "rescue" campaign was ongoing, led by Operation Rescue. This is the first time I recall participating on the street in pro-life activism.

It was during one or more of the indoor rallies associated with the street activity where I believe I became increasingly impressed with the Biblical understanding that "abortion" in America was inviting God's Divine judgment upon America corporately. I was growing in the understanding that it was not only the pregnant woman and the abortionist whom she employs to kill her baby who were guilty, but that there is also a **corporate bloodguilt that comes upon a nation for the shedding of innocent blood** such as by "abortion", which is child-murder.

Now, over 36 years later, I understand and believe there are multiple corporate judgments upon America that we are suffering today, which have connection in Scripture to the shedding of innocent blood, which is what child-murder by "abortion" is, as **Divine Judgments**, including **INVASION** (think of the millions who have invaded America through our Southern Border), **BLOODSHED** (think of all the gun and other violence in America, including in Columbia, South Carolina), and **OPPRESSION** (In the 118th Congress, U.S. House of Representatives Judiciary Committee even established a Select Subcommittee on the Weaponization of the Federal Government, to address Federal Government tyranny against the American people).

INVASION, and BLOODSHED, and OPPRESSION all have connection in Scripture as Divine Judgments upon a nation for the shedding of innocent blood.

INVASION – 2 Kings 24:1-4, KJV (Judah invaded 605 B.C. by Nebuchadnezzar and allied bands)
– 2 Kings 17:5-23, KJV (Israel invaded by Assyrians, conquered 722 B.C.)

BLOODSHED – Hosea 4:2, KJV: "blood toucheth blood" [bloodshed follows bloodshed]
– Ezekiel 35:6, KJV: "Therefore, *as* I live, saith the Lord GOD, I will prepare thee unto blood, and blood shall pursue thee: sith [since] thou hast not hated blood, [i.e., the shedding of blood] *even* blood shall pursue thee."
– Numbers 35:33, KJV: "So ye shall not pollute the land wherein ye *are:* for blood it defileth the land: and the land cannot be cleansed of the blood that is shed therein, but by the blood of him that shed it."

OPPRESSION – Psalm 106:34-48, KJV; citing here only verses 37 - 42:
37 Yea, they sacrificed their sons and their daughters unto devils,
38 And shed innocent blood, *even* the blood of their sons and of their daughters, whom they sacrificed unto the idols of Canaan: and the land was polluted with blood.
39 Thus were they defiled with their own works, and went a whoring with their own inventions.
40 Therefore was the wrath of the LORD kindled against his people, insomuch that he abhorred his own inheritance.
41 And he gave them into the hand of the heathen; and they that hated them ruled over them.
42 Their enemies also oppressed them, and they were brought into subjection under their hand.

The fact that child-murder by "abortion" itself is protected and regulated in and by the State of South Carolina is itself an example of oppression, injustice, and tyranny. The abundant Scriptural; biological, scientific, and medical; and legal evidence, some of which has already been presented in this Amended Pro Se Supplemental Brief, leads to the rational conclusions that human life begins at conception, that human beings have a right to life from conception, and that "abortion" is a criminal act of murder, and any system of law that permits it, as Blackstone said, "offend[s] both the natural and the divine."

God's Word says, "Thou shalt not kill (murder)." Exodus 20:13, KJV. The Lord Jesus Christ says, "Thou shalt do no murder." Matthew 19:18, KJV. The Appellant believes "abortion" is murder, and he believes God commands all men everywhere (Matthew 4:4, KJV) not to commit it.

God is not mocked. We reap what we sow, individually (Galatians 6:7, KJV), and I believe also as Cities, States, and as a Nation. We have "sown" bloodshed and violence in the womb by "abortion" and we are reaping bloodshed and violence outside the womb in our streets, schools, stores, homes, and elsewhere. The love and fear of God (Matthew 22:37-40; Leviticus 20:3, KJV) compels me to act.

During the 1787 Constitutional Convention, Virginia Delegate George Mason, who is known as the Father of the Bill of Rights, said, **"By an inevitable chain of causes and effects, Providence punishes national sins by national calamities."** He was speaking of **the national sin of Slavery.** I believe the same fearful, prophetic message applies today to **America's national sin of killing children** in the wombs of their mothers, which we euphemistically call "abortion". It is child-sacrifice, child-murder.

Over 77 years after George Mason's prophetic words, near the end of America's most costly war (est. 620,000 military lives lost by North and South [https://www.battlefileds.org/learn/articles/civil-war-casualties]), President Lincoln spoke of the War Between North and South as Divine Judgment for the "offense" of American Slavery:

President Abraham Lincoln
Second Inaugural Address
Saturday, March 4, 1865

[Excerpt]

If we shall suppose that American slavery is one of those offenses which, in the providence of God, must needs come, but which, having continued through His appointed time, He now wills to remove, and that He gives to both North and South this terrible war as the woe due to those by whom the offense came, shall we discern therein any departure from those divine attributes which the believers in a living God always ascribe to Him? Fondly do we hope, fervently do we pray, that this mighty scourge of war may speedily pass away. Yet, if God wills that it continue until all the wealth piled by the bondsman's two hundred and fifty years of unrequited toil shall be sunk, and until every drop of blood drawn with the lash shall be paid by another drawn with the sword, as was said three thousand years ago, so still it must be said "the judgments of the Lord are true and righteous altogether."

[https://www.bartleby.com/lit-hub/inaugural-addresses-of-the-presidents-of-the-united-states/abraham-lincoln-second-inaugural-address/]

Beyond the moral outrage and abomination of allowing the shedding of the judicially innocent blood of children within their mothers' wombs by "abortion", the prosecution of those who in Biblical obedience (e.g., Matthew 22:37-40; Proverbs 24:10-12, KJV) seek to peacefully, prayerfully, nonviolently interpose ("rescue") on behalf of those unjustly sentenced to death, adds another layer of oppression, injustice, and tyranny. Such is the case of the federal F.A.C.E. Act prosecutions.

The Bible says in Acts 5:29, KJV

"We ought to obey God rather than men."

The Bible says in Proverb 17:26, KJV

"Also to punish the just *is* not good, …"

The Bible says in Proverb 17:15, KJV

"He that justifieth the wicked, and he that condemneth the just,
even they both *are* abomination to the LORD."

After the 2022 *Dobbs* ruling and Opinion, there is no longer a federal constitutional "right" to "abortion" (in truth, there never was).

The *Dobbs* Opinion states: "We hold that *Roe* and *Casey* must be overruled. The Constitution makes no reference to abortion, and no such right is implicitly protected by any constitutional provision, including the one on which the defenders of *Roe* and *Casey* now chiefly rely – the Due Process Clause of the Fourteenth Amendment." 597 U.S. 215, 231

From the *Dobbs* Syllabus, *"Held:* The Constitution does not confer a right to abortion; *Roe* and *Casey* are overruled; and the authority to regulate abortion is returned to the people and their elected representatives." 597 U.S. 215

While *Dobbs* does not ban "abortion" in the United States, neither does it prohibit "abortion" from being banned in any or all States, or federally in the United States; but rather *Dobbs* allows "abortion" to be banned in any or all States, and federally in the United States. In fact, as of February 2025, near-total "abortion" bans (of surgical and "abortion" pill "abortions") were in effect in 12 States: AL, ARK, ID, IND, KY, LA, MISS, OK, SD, TN, TX, and WV.**

**
'A state-by-state breakdown of where abortion stands after ballot initiatives pass'
ABC News
Nov 12, 2024
https://abcnews.go.com/GMA/Wellness/state-state-breakdown-abortion-stands-after-ballot-initiatives/story?id=115730446#:~:

Are these 12 States in violation of the F.A.C.E. Act for interfering with "abortion" by largely criminalizing these types of "abortions" ? Is the DOJ going to indict officials in these 12 States ?

How can it be a federal crime (18 U.S.C. Section 248) to interfere with a practice (i.e., "abortion"), which itself may be criminalized, and is in fact criminalized to a large degree by 12 States ?

How can there be a federal crime specifically criminalizing conduct that interferes with something that is itself specifically criminalized [and therefore interfered with] by 12 States (i.e., "abortion") ?

How can there be a federal crime which specifically prohibits interfering with something that is not only not a federal constitutional right, i.e., "abortion", but which may be criminalized by all 50 States, and was in fact, as of February 2025, criminalized to a large degree in 12 States ?

How can it be constitutional to make it a federal crime to interfere with "abortion" when "abortion" itself can be criminalized, requiring it to be interfered with by the States which do so ?

***Marbury v. Madison* (1803): "... a law repugnant to the Constitution is void, ..."**

Marbury v. Madison
5 U.S. 137 (1803)

US Supreme Court
Justia
https://supreme.justia.com/cases/federal/us/5/137/

"It is also not entirely unworthy of observation that, in declaring what shall be the supreme law of the land, the Constitution itself is first mentioned, and not the laws of the United States generally, but those only which shall be made in pursuance of the Constitution, have that rank."

"Thus, the particular phraseology of the Constitution of the United States confirms and strengthens the principle, supposed to be essential to all written Constitutions, that a law repugnant to the Constitution is void, and that courts, as well as other departments, are bound by that instrument."

Furthermore, in this instant F.A.C.E. case, the unjust charging, prosecution, and judgment of even just one sole individual engaged in a nonviolent "sit-in" outside an external door entrance, is not consistent with the Congressional Findings used to justify passing the F.A.C.E. Act (S.636) as introduced in 1993, and amounts to an abuse of prosecutorial discretion, especially considering also the individual had already been charged with state trespass [See Motion to Dismiss (ECF No. 63), para. IV. (p.13), CR. NO. 3:23-00117-JFA], for which Lefemine was convicted on January 24, 2024 in a jury trial, and sentenced to a $465 fine.

Furthermore, this dual and successive prosecution by the United States Attorney in South Carolina contravenes the provision in the Justice Manual of the Department of Justice, Title 9: Criminal, 9-2.000 – Authority Of The U.S. Attorney In Criminal Division Matters/Prior Approvals, 9-2.031 – Dual and Successive Prosecution Policy ("Petite Policy") which states within paragraph 1. Statement of Policy:

> "This policy precludes the initiation or continuation of a federal prosecution, following a prior state or federal prosecution based on substantially the same act(s) or transaction(s) unless three substantive prerequisites are satisfied:… second, the prior prosecution must have left that interest demonstrably unvindicated;…"

As stated above, the prior state charge prosecution resulted in a jury conviction and fine sentence. This entire present federal proceeding fails the second prong of the Department of Justice's substantive prerequisites.

Justice Manual

9-2.000 - Authority Of The U.S. Attorney In Criminal Division Matters/Prior Approvals

9-2.031 - Dual and Successive Prosecution Policy ("Petite Policy")

United States Department of Justice
https://www.justice.gov/jm/jm-9-2000-authority-us-attorney-criminal-division-mattersprior-approvals#9-2.031

America is in great trouble today because of our refusal to believe God, the Author of Truth.

The Bible says in Hosea 4:1,2, KJV

1 Hear the word of the LORD, ye children of Israel: for the LORD hath a controversy with the inhabitants of the land, because there is no truth, nor mercy, nor knowledge of God in the land.
2 By swearing, and lying, and killing, and stealing, and committing adultery, they break out, and blood toucheth blood.

The Bible says in Isaiah 59:14,15, KJV

14 And judgment is turned away backward, and justice standeth afar off:
for truth is fallen in the street, and equity cannot enter.
15 Yea, truth faileth; and he that departeth from evil maketh himself a prey:
And the LORD saw it, and it displeased him that there was no judgment.

Jesus Christ prayed to God the Father, in John 17:17

"… Thy word is truth."

Jesus Christ said in John 14:6

"…I am the way, the truth, and the life: no man cometh unto the Father, but by Me."

"Truth will ultimately prevail where pains is taken to bring it to light."

George Washington
Letter to Charles M. Thruston
- Sunday, August 10, 1794

George Washington's Mount Vernon
https://www.mountvernon.org/library/digitalhistory/past-projects/quotes/article/truth-will-ultimately-prevail-where-pains-is-taken-to-bring-it-to-light/

The rightful, just basis for all human laws is the Word of God: God's Law in Nature and God's Law in Revelation.

1. **God's Law is the rightful, just basis for man's law**

2. **Human life begins at conception; A human being exists at conception**

3. **Every human being has a Creator God-given, inherent, unalienable right to life as a natural "person" which should rightly be recognized in law as legal personhood**

4. **As stated by Virginia Delegate George Mason in the 1787 Constitutional Convention: "By an inevitable chain of causes and effects, Providence punishes national sins by national calamities."**

The Defendant's Motion for Allowance of a Defense of Necessity was denied by the trial Court at the beginning of the bench trial proceedings on March 11, 2024, barring the introduction of certain evidence at trial to make the case that Defendant Lefemine's nonviolent interposition between human beings in the womb and those inside the Planned Parenthood "abortion" center who would destroy them, was justified. Thus the Defendant was denied the opportunity to make an adequate and effective defense that was rational, true, actual, real and just.

The Appellant respectfully asserts he was denied the right of an adequate and effective defense by the trial Court, and therefore justly argues Appellant's conviction should be reversed and this case dismissed by this Court.

MOTION FOR ALLOWANCE OF DEFENSE OF NECESSITY
ECF No. 77 (Filed Feb 13, 2024)

PETITION TO THE COURT TO ACKNOWLEDGE THE DECLARATION OF INDEPENDENCE INHERENTLY RECOGNIZES THE PERSONHOOD OF ALL MEN
ECF No. 79 (Filed Feb 14, 2024)

DEFENDANT'S REPLY TO GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION FOR ALLOWANCE OF DEFENSE OF NECESSITY
ECF No. 98 (Filed March 4, 2024)

DEFENDANT'S CORRECTED AFFIDAVIT IN SUPPORT
ECF No. 99 (Filed March 4, 2024)

---

5. The origin of the FACE Act was to protect the so-called "right" to "abortion"; after *Dobbs*, there is no federal constitutional right to "abortion"; federal FACE Act should be overturned

FACE was originally introduced for the purpose of protecting abortion and access to abortion. The findings supporting the need for the Act and the dominant legislative history were thus focused on abortion. When the Supreme Court handed down its decision in *Dobbs v. Jackson Women's Health Organization* (597 U.S. 215, June 24, 2022) the federal constitutional "right" to abortion ceased to exist, and the very reason for FACE, its essence, its foundation, was destroyed. There is no federal constitutional "right" to "abortion" after *Dobbs*; the federal FACE Act should be overturned.

The legislative history proves that FACE was enacted primarily to protect abortion.

As introduced by Senator Kennedy on March 23, 1993, FACE was explicit in its purpose of protecting abortion and abortion alone. Senate Bill 636 recited that it was introduced in response to the Supreme Court's decision only two months earlier in the case of *Bray v. Alexandria Women's Health Clinic*, 506 U.S. 263 (1993), which held that pro-life activists could not be held liable under 42 U.S.C. § 1985(3), the civil counterpart to 18 U.S.C. § 241, for their actions in trespassing and obstructing access to abortion facilities. In *Bray*, the plaintiff abortion facilities had originally succeeded in obtaining a permanent injunction against Operation Rescue and certain individuals for "conspiring to deprive women seeking abortions of their right to interstate travel" and enjoining them "from trespassing on, or obstructing access to, abortion clinics in specified Virginia counties and cities in the Washington, D.C., metropolitan area." 506 U.S. 263, 267.

In Section 2 of the bill, as introduced March 23, 1993, Congressional Statement of Findings and Purpose, for example, it recited (emphasis added):

(a) Findings. —Congress finds that—
(1) medical clinics and other facilities **offering abortion services** have been targeted in recent years by an interstate campaign of violence and obstruction aimed at closing the facilities or physically blocking ingress to them, and intimidating **those seeking to obtain or provide abortion services;**

* * *

(8) in the *Bray* decision, the Court denied a remedy under such section to persons injured **by the obstruction of access to abortion services**;

(9) **legislation is necessary to prohibit the obstruction of access by women to abortion services** and to ensure that persons injured by such conduct, as well as the Attorney General, can seek redress in the Federal courts;

(10) **the obstruction of access to abortion services can be prohibited**, and the right of injured parties to seek redress in the courts can be established, without abridging the exercise of any rights guaranteed under the First Amendment to the Constitution or other law; and . . .

Senate Bill 636 -- Freedom of Access to Clinic Entrances Act of 1994, 103rd Congress (1993-1994)

https://www.congress.gov/bill/103rd-congress/senate-bill/636/text/is?r=29.

The purpose of the Act was also explicitly stated:

(b) Purpose. -- It is the purpose of this Act to protect and promote the public health and safety by prohibiting the use of force, threat of force or physical obstruction to injure, intimidate or interfere with **a person seeking to obtain or provide abortion services**, and the destruction **of property of facilities providing abortion services**, and by establishing the right of private parties injured by such conduct, as well as the Attorney General in appropriate cases, to bring actions for appropriate relief.

Id. at Sec. 2(b) (emphasis added).

Similarly, the operative section setting forth the prohibited conduct (which eventually became Sec. 248(a)(1) and (2)) explicitly referred to abortion:

(a) Prohibited Activities. —Whoever—
(1) by force or threat of force or by physical obstruction, intentionally injures, intimidates or interferes with or attempts to injure, intimidate or interfere with any person because that person is or has been, or in order to intimidate such person or any other person or any class of persons, from—
(A) **obtaining abortion services**; or
(B) lawfully aiding another person **to obtain abortion services**; or
(2) intentionally damages or destroys the property of a medical facility or in which a medical facility is located, or attempts to do so, **because such facility provides abortion services**, shall be subject to the penalties provided in subsection (b) and the civil remedy provided in subsection (e).

Id. at Sec. 3 (emphasis added).

As reported out of the Senate Committee on Labor and Human Resources on July 29, 1993, the language referring to "abortion" or "abortion services" was modified to "abortion-related services." S. REP. 103-117, 50 (1993). Eventually, of course, "abortion-related services" became "reproductive health services" in the final version. That these explicit references to abortion and abortion services were later softened to refer to "reproductive health services" does not change the fact that the underlying purpose of the Act from its inception was to protect abortion.

In Section IV., entitled "NEED FOR THE LEGISLATION," the S. REP. 103-117 Report explains:

> A nationwide campaign of **anti-abortion blockades**, invasions, vandalism and outright violence is **barring access to facilities that provide abortion services** and endangering the lives and well-being of the health care providers who work there and the patients who seek their services. **This conduct is interfering with the exercise of the constitutional right of a woman to choose to terminate her pregnancy**, and threatens to exacerbate an already severe shortage **of qualified providers available to perform safe and legal abortions** in this country.

S. REP. 103-117, 3 (emphasis added). It is therefore incontestable that FACE was enacted primarily to protect access to abortion.

In *Dobbs v. Jackson Women's Health Organization*, 597 U.S. 215 (2022), the Supreme Court overruled Roe v. Wade (410 U.S. 113 (1973)) and Planned Parenthood of Southeastern Pa. v. Casey (505 U.S. 833 (1992)) and declared that there is no federal constitutional right to abortion. "We hold that *Roe* and *Casey* must be overruled. The Constitution makes no reference to abortion, and no such right is implicitly protected by any constitutional provision, including the one on which the defenders of Roe and Casey now chiefly rely—the Due Process Clause of the Fourteenth Amendment." 597 U.S. at 231.

There is therefore no federal constitutional right to abortion. The FACE Act should be overturned.

6. <u>The application of the FACE Act in this case was inconsistent with Congress' findings and intent</u>

Bringing an indictment for violating the FACE Act against one sole individual engaged in a nonviolent "sit-in" outside an external door entrance is not consistent with the Congressional Findings used to justify passing the FACE Act, and amounts to an abuse of prosecutorial discretion. In addition, the individual had already been charged with state trespass. Furthermore, the state trespass proceeding was concluded with a jury trial conviction in municipal court and a sentence of $465 on January 24, 2024, <u>before</u> the federal FACE bench trial began on February 23, 2024, and then was continued and completed on March 11, 2024, resulting in conviction, sentencing to 60 days of federal imprisonment, and $1,000 fine.

The legislative history proves that part of the justification for the need for federal FACE legislation was to handle mass protests.

In Section 2 of the bill, as introduced March 23, 1993, Congressional Statement of Findings and Purpose, for example, it recited:

> (a) Findings – Congress finds that—
>
> (1) medical clinics and other facilities offering abortion services have been targeted in recent years by **an interstate campaign of violence** and obstruction aimed at closing the facilities or physically blocking ingress to them, and intimidating those seeking to obtain or provide abortion services;
>
> * * *
>
> (4) the methods used to deny women access to these services include blockades of facility entrances; **invasions and occupations of the premises; vandalism and destruction of property in and around the facility; bombings, arson, and murder**; and other acts of force and threats of force;
>
> (5) those engaging in such tactics **frequently trample police lines and barricades and overwhelm State and local law enforcement authorities and courts** and their ability to restrain and enjoin unlawful conduct and prosecute those who have violated the law;
>
> (6) such conduct operates to infringe upon women's ability to exercise full enjoyment of rights secured to them by Federal and State law, both statutory and constitutional, and burdens interstate commerce, including by interfering with business activities of medical clinics involved in interstate commerce and by forcing women to travel from States where their access to reproductive health services is obstructed to other States; (emphasis added).

In the instant case, Defendant made an appointment and met with the Columbia Chief of Police on November 14, 2022 to inform him of his intentions, although no date was given. On the day of the nonviolent interposition (November 15, 2022), the Defendant was essentially outnumbered by the police presence 3:1, one officer was even released from the scene by a supervisor because his presence was apparently not needed. The Defendant was charged with trespass on the scene and released. The federal FACE Act charge and indictment that was brought February 22, 2023 against one sole individual was an overreach of the exercise of federal authority and power and an abuse of prosecutorial discretion.

7. <u>United States District Judge Laplante Order Granting Petitioner's Motion For Provisional Class Certification of "future persons" for purpose of (nationwide) preliminary injunctive relief in "Barbara," et al. v. Donald J. Trump, President of the United States, in his official capacity, et al., Civil No. 25-cv-244-JL-AJ (ECF No. 63), District of New Hampshire, July 10, 2025</u>

In a federal immigration law case filed June 27, 2025 ("Barbara" v. Trump), U.S. District Judge Joseph Laplante "has issued a nationwide preliminary injunction against former President Trump's executive order attempting to end birthright citizenship for children of noncitizen parents." ('CODIFIED — Rights of the Unborn Protected', Canada Free Press, July 14, 2025; further excerpts from this article included below).

'Final Word: A liberal judge's broad-brush efforts in preserving the rights of illegal aliens unwittingly safeguarded the rights of unborn children.'
'CODIFIED — Rights of the Unborn Protected'
Canada Free Press
July 14, 2025
https://canadafreepress.com/article/codifiedrights-of-the-unborn-protected

"While the headlines have focused on immigration, the decision also contains language with potentially historic implications: it formally recognizes a class that includes "future persons", individuals not yet born at the time of the lawsuit."

All human beings are **natural persons** by definition (Black's Law Dictionary, Ninth Edition, 2009). If unborn human beings are rightly recognized as **legal persons,** their Creator God-given inherent, unalienable right to life is protected by statutory and constitutional law, i.e., no so-called "right" to "abortion". [Appellant]

"The issue that has been opened up is how the court defined "future persons." The text of the certification order explicitly states: "The certified class comprises all current and future persons who are born on or after February 20, 2025…" "

"This language means the injunction applies not only to living infants but also to unborn children who would later be born into the class of affected individuals. In other words, the court recognized the legal protectability of rights accruing to persons not yet born, at least for the narrow purpose of preserving their future citizenship status."

"Possibly unknowingly, the court established a potential precedent for unborn standing."

"What makes Judge Laplante's ruling significant is that, for the first time in a high-profile federal case, a court explicitly acknowledged "future persons" as a certifiable class with protectable interests before birth."

"While the order itself carefully limited this recognition to birthright citizenship, its conceptual

threshold is new: it treats the legal interests of the unborn as sufficiently real and immediate to justify an injunction on their behalf."

"One thing is certain: the phrase "future persons," once largely theoretical, has now entered the lexicon of federal judicial orders. If upheld, it could become a foundation stone for arguments over the legal standing and rights of the unborn in the decades ahead."

Judge Laplante's Birthright Citizenship Rulings - July 10,2025
https://storage.ning.com/topology/rest/1.0/file/get/13659402272?profile=original

[See Judge Laplante's two "Barbara" v. Trump case Birthright Citizenship Orders in next two pages following.]

8. <u>The required written "human being advisory" within South Dakota House Bill 1166 enacted in 2005 was upheld by the 8th Circuit Court of Appeals in Planned Parenthood Minnesota, et al v. Mike Rounds, et al, No. 09-3362 (8th Cir. 2011), Filed: September 2, 2011</u>

"Court Description: Civil case - South Dakota Abortion Law. ... This action involves facial challenges to the constitutionality of South Dakota's 2005 law on informed consent to abortion. The court en banc's opinion upheld the law's human being advisory against a facial challenge, and the portion of the district court's decision reaching the same conclusion is affirmed; ..." (excerpt from JUSTIA U.S. Law entry on the case).

JUSTIA U.S. Law
Planned Parenthood Minnesota, et al v. Mike Rounds, et al,
No. 09-3362 (8th Cir. 2011)
Filed: September 2, 2011
https://law.justia.com/cases/federal/appellate-courts/ca8/09-3362/093231p-2011-09-02.html

---

United States Court of Appeals
FOR THE EIGHTH CIRCUIT
Planned Parenthood Minnesota, et al v. Mike Rounds, et al,
Nos. 09-3231/3233/3362
Appeals from the United States District Court for the District of South Dakota.
https://cases.justia.com/federal/appellate-courts/ca8/09-3362/093231p-2011-09-02.pdf?ts=1411168646

Excerpts:

"In 2005 South Dakota enacted House Bill 1166 (the Act) which is the subject of this action. The Act amended South Dakota's Public Health and Safety Code, expanding the requirements for informed consent to abortion. Under § 7 of the Act, each woman contemplating abortion is to be given oral advisories [fn. 3] twenty four hours in advance of the procedure by the doctor scheduled to perform the abortion or by the doctor's designee. The doctor must give other written advisories at least two hours before the procedure."

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

"Barbara," et al.

v.

Civil No. 25-cv-244-JL-AJ

Donald J. Trump, President of the United States, in his official capacity, et al.

ORDER GRANTING PETITIONERS' MOTION FOR CLASSWIDE PRELIMINARY INJUNCTION

After careful consideration of the parties' submissions, the supporting declarations, the applicable law, and the filings and record in this case, the court GRANTS Petitioners' Motion for a Classwide Preliminary Injunction (doc. 6).[1]

The court hereby finds that Class Petitioners have demonstrated likelihood of success on the merits of their claims; that Class Petitioners are likely to suffer irreparable harm if the order is not granted; that the potential harm to the class petitioners if the order is not granted outweighs the potential harm to Respondents if the order is granted; and that the issuance of this order is in the public interest.

Pursuant to Federal Rule of Civil Procedure 65(a), this court orders that the U.S. Department of Homeland Security; the Secretary of the Department of Homeland Security, in their official capacity; the U.S. Department of State; the Secretary of the U.S. Department of State, in their official capacity; the U.S. Department of Agriculture; the Secretary of the U.S. Department of Agriculture, in their official capacity; the Centers for Medicare and Medicaid Services; and the Administrator for the Centers for Medicare and Medicaid Services, in their official capacity are enjoined and restrained from enforcing the Executive Order "Protecting the Meaning and Value of American Citizenship."

The court requires a nominal bond of $1 under Fed. R. Civ. P. 65(c). This preliminary injunction is STAYED for seven (7) days pending appeal.

SO ORDERED.

Joseph N. Laplante
United States District Judge

Dated: July 10, 2025
cc: Counsel of Record

[1] The certified class has been narrowed by the court from that requested by the petitioners.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

"Barbara," et al.

v.

Civil No. 25-cv-244-JL-AJ

Donald J. Trump, President of the United States, in his official capacity, et al.

ORDER GRANTING PETITIONERS' MOTION FOR PROVISIONAL CLASS CERTIFICATION AND APPOINTMENT OF CLASS COUNSEL

After careful consideration of the parties' submissions, the supporting declarations, the applicable law, and the filings and record in this case, the court GRANTS Petitioners' Motion for Provisional Class Certification and Appointment of Class Counsel (doc. 5).

The Court hereby finds that Petitioners have satisfied the requirements for provisional class certification under Federal Rules of Civil Procedure 23(a) and (b)(2). Specifically, Petitioners have demonstrated that (1) members of the proposed class are so numerous that joinder is impracticable; (2) there are questions of law and fact common to the class; (3) the claims of the petitioners are typical of the claims of the class members; and that (4) Petitioners and their counsel, as representatives of the class, will fairly and adequately protect the interests of the class. Additionally, this court provisionally finds that Respondents have acted on grounds generally applicable to the class in its entirety, thereby making appropriate final injunctive and declaratory relief for all class members. Because this certification is provisional, final relief is not granted at this time.

In light of the above, this court grants the petitioners' motion and provisionally certifies the following class for the purpose of preliminary injunctive relief: All current and future persons who are born on or after February 20, 2025, where (1) that person's mother was unlawfully present in the United States and the person's father was not a United States citizen or lawful permanent resident at the time of said person's birth, or (2) that person's mother's presence in the United States was lawful but temporary, and the person's father was not a United States citizen or lawful permanent resident at the time of said person's birth.

SO ORDERED.

Joseph N. Laplante
United States District Judge

Dated: July 10, 2025
cc: Counsel of Record

"The written advisories required by § 7(1) are to inform the patient"

"(b)That the abortion will terminate the life of a whole, separate, unique, living human being [the human being advisory];" [Continued... (c) and (d)]

"S.D.C.L. § 34-23A-10.1(1)(b)–(d)."

"Because Rounds upheld the human being advisory against a facial challenge, the district court certainly did not err in doing the same. It should therefore be affirmed." [i.e., by the 8th Circuit Court]

The human being advisory under § 7(1) requires that the pregnant woman be told that an abortion "will terminate the life of a whole, separate, unique, living human being." S.D.C.L. § 34-23A-10.1(1)(b)

Taken together with South Dakota's statutory definition of "human being", this "includ[es] the unborn human being during the entire embryonic and fetal ages from fertilization to full gestation." S.D.C.L. § 34-23A-1(4).

All human beings are **natural persons** by definition (Black's Law Dictionary, Ninth Edition, 2009). If unborn human beings are rightly recognized as **legal persons,** their Creator God-given inherent, unalienable right to life is protected by statutory and constitutional law, i.e., no so-called "right" to "abortion". [Appellant]

RECENT ACTIONS TAKEN BY PRESIDENT TRUMP AND TRUMP DEPARTMENT OF JUSTICE EXERCISING EXECUTIVE CLEMENCY AND PROSECUTORIAL DISCRETION

1) President Trump pardons over 20 pro-life advocates convicted under FACE Act

Whitehouse.gov
Remarks by President Trump at Executive Order Signing January 23, 2025
https://www.whitehouse.gov/remarks/2025/01/remarks-by-president-trump-at-executive-order-signing/
[broken hyperlink]

[In the Oval Office:]

MR. SCHARF: Next, we have a set of pardons for peaceful pro-life protestors who were prosecuted by the Biden administration for exercising their First Amendment rights.

THE PRESIDENT: Do you know how many?

MR. SCHARF: I believe it's 23, sir.

THE PRESIDENT: Twenty-three people that were prosecuted. **They should not have been prosecuted.** Man- of — many of them are — are elderly people. **They should not have been prosecuted.** This is a great honor to sign this. [emphasis added]

(The proclamation is signed.)

They'll be very happy.

MR. SCHARF: Thank you, sir.

THE PRESIDENT: So, they're all in prison now?

MR. SCHARF: Some are. Some are — are out of custody.

THE PRESIDENT: **It's ridiculous.** [emphasis added]

2) Trump Department of Justice issues Memorandum changing FACE Act Charging Policy;
FACE Act no longer to be used against peaceful, nonviolent protesters **(prosecutorial discretion)**

'Trump DOJ Promises End to 'Weaponization' of FACE Act, Drops Three Cases'
Breitbart News
Jan 27, 2025
https://www.breitbart.com/politics/2025/01/27/trump-doj-promises-end-to-weaponization-of-face-act-drops-three-cases/

U.S. Department of Justice
Office of the Associate Attorney General
January 24, 2025
MEMORANDUM FOR ... SUPERVISORY OFFICIAL OF THE CIVIL RIGHTS DIVISION
SUBJECT: FACE ACT CHARGING POLICY

https://www.documentcloud.org/documents/25503853-12425-doj-memo-on-face-act-prosecutions/?mode=document

[See this January 24, 2025 U.S. Department of Justice Memorandum in next page following.]

In addition, President Trump signed this Executive Order January 20, 2025:

Presidential Actions
DEFENDING WOMEN FROM GENDER IDEOLOGY EXTREMISM AND RESTORING BIOLOGICAL TRUTH TO THE FEDERAL GOVERNMENT

https://www.whitehouse.gov/presidential-actions/2025/01/defending-women-from-gender-ideology-extremism-and-restoring-biological-truth-to-the-federal-government/

Excerpts [emphasis added]:

Sec. 2. Policy and Definitions. It is the policy of the United States to recognize two sexes, male and female. These sexes are not changeable and are grounded in fundamental and incontrovertible reality. Under my direction, the Executive Branch will enforce all sex-protective laws to promote this reality, and the following definitions shall govern all Executive interpretation of and application of Federal law and administration policy:

* * *

(d) **"Female"** means a **person** belonging, **at conception,** to the sex that produces the large reproductive cell.

(e) **"Male"** means a **person** belonging, **at conception,** to the sex that produces the small reproductive cell.

America's National Motto "IN GOD WE TRUST"

The truth of God's Law being the rightful, just basis for all human laws undergirds Appellant's principled belief that the prosecution and conviction in this case, CR. NO. 3:23-00117-JFA, have been **unjust.** With the great notable and tragic exception of unbiblical American Slavery, the evidence is manifold that law in America, for about 300 years, from at least the Pilgrim's 1620

U. S. Department of Justice

Office of the Associate Attorney General

Washington, D.C. 20530

January 24, 2025

MEMORANDUM FOR KATHLEEN WOLFE, SUPERVISORY OFFICIAL OF THE CIVIL RIGHTS DIVISION

FROM: THE CHIEF OF STAFF TO THE ATTORNEY GENERAL CAM
(Exercising the Authority of the Acting Associate Attorney General)

SUBJECT: FACE ACT CHARGING POLICY

President Trump campaigned on the promise of ending the weaponization of the federal government and has recently directed all federal departments and agencies to identify and correct the past weaponization of law enforcement.

To many Americans, prosecutions and civil actions under the Freedom of Access to Clinic Entrances Act ("FACE Act") have been the prototypical example of this weaponization. And for good reason. Even though more than 100 crisis pregnancy centers, pro-life organizations, and churches were attacked in the immediate aftermath of the *Dobbs* decision, nearly all prosecutions under the FACE Act have been against pro-life protesters. That is not the even-handed administration of justice.

To address this concern and to ensure that federal law enforcement and prosecutorial resources are devoted to the most serious violations of federal law, future abortion-related FACE Act prosecutions and civil actions will be permitted only in extraordinary circumstances, or in cases presenting significant aggravating factors, such as death, serious bodily harm, or serious property damage. Cases not presenting significant aggravating factors can adequately be addressed under state or local law. Additionally, until further notice, no new abortion-related FACE Act actions—criminal or civil—will be permitted without authorization from the Assistant Attorney General for the Civil Rights Division.

In light of these enforcement priorities, I direct you to immediately dismiss, with prejudice, the following FACE Act cases:

- *United States v. Connolly*, No. 2:24-cv-04467 (E.D. Penn.).
- *United States v. Zastrow, et al.*, No. 2:24-cv-00576 (M.D. Fla.).
- *United States v. Citizens for a Pro-Life Society, et al.*, No. 1:24-cv-00893 (N.D. Ohio).

If needed, further case-specific guidance will follow for cases in which a criminal conviction has already been obtained but in which a sentence has not yet been imposed, or in which the appeals are not yet completed, that did not present significant aggravating factors.

Mayflower Compact, through the end of the 19th Century, as reflected in the United States Supreme Court Opinion, *Rector, Etc., of Holy Trinity Church v. United States* (143 U.S. 457, February 29, 1892), was originally predominantly founded upon God's Law.

By the grace and mercy of God, perhaps our nation is even now beginning to see a return to these foundational and timeless truths, as evidenced for example in the Majority Opinion and the Chief Justice's opinion concurring specially, of the recent Alabama Supreme Court case in *James LePage, et al. v. The Center for Reproductive Medicine and Mobile Infirmary Assoc* (SC-2022-0515, February 16, 2024). Lord willing, may it be so.

Almost 70 years ago, the United States Congress passed a Joint Resolution [H. J. Res. 396] "To establish a national motto of the United States." It states, "*Resolved by the Senate and House of Representatives of the United States of America in Congress assembled*, That the national motto of the United States is hereby declared to be "In God we trust." It was approved July 30, 1956 [Public Law 84-851]. [https://www.congress.gov/84/statute/STATUTE-70/STATUTE-70-Pg732-2.pdf] [https://www.govinfo.gov/app/details/STATUTE-70/STATUTE-70-Pg732-2].

The United States Code [36 U.S.C. §302. National motto - https://uscode.house.gov/] states: "In God we trust" is the national motto.

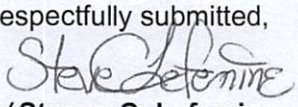
There is a hymn in The Baptist Hymnal (© Copyright 1991) entitled "God of Our Fathers" (#629). The first stanza begins with the words, "God of our fathers, whose almighty hand …". Then, halfway through the second stanza, **"Be Thou our ruler, guardian, guide, and stay, *Thy Word our law*, Thy paths our chosen way."** [emphasis added] The hymn was written in 1876 for a "Centennial" Fourth of July celebration. If the United States of America is to be true to her own codified national motto, "In God we trust", which has Biblical foundation (e.g., Psalm 91:2, Psalm 56:11, KJV), may America corporately come to the realization once again, that law is rightly, justly, the will of the Creator.

The truth of God's Law being the rightful, just basis for man's law undergirds Appellant's principled belief that the prosecution and judgment in this case (CR. NO. 3:23-00117-JFA), were unjust, and therefore justly argues for reversal of Appellant's conviction and for case dismissal by this Court.

The truth of the matter, and for multiple reasons, is case CR. NO. 3:23-00117-JFA should never have been brought by the prosecution in the first place. Justice was not served because this prosecution and conviction were not based upon truth.

For all the pertinent reasons in the pages above, Appellant Lefemine therefore justly argues Appellant's conviction should be reversed and this case dismissed by this Court.

Respectfully submitted,



/s/ Steven C. Lefemine

STEVEN C. LEFEMINE
Appellant
PO Box 12222, Columbia, SC 29211
(803) 760-6306 * CP@spiritcom.net

West Columbia, South Carolina
August 11, 2025

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this 11th day of August, 2025, I am causing this Appellant's Amended Pro Se Supplemental Brief to be sent by postal mail to the Clerk of Court in Richmond, VA for filing at this address:

Clerk of Court, U.S. Court of Appeals for the Fourth Circuit
1100 East Main Street, Suite 501
Richmond, VA 23219
ATTN: Paige Ballard

I further certify that on this 11th day of August, 2025, I am causing a copy of this Appellant's Amended Pro Se Supplemental Brief to be sent by email to counsel for the Appellee, and to CJA counsel for the Appellant, to the respective e-mail addresses below:

T. DeWayne Pearson
Counsel for Appellee

"DeWayne Pearson, USASC" dpearson@usa.doj.gov
"DeWayne Pearson" DeWayne.Pearson@usdoj.gov

James Brown, Jr.
Counsel for Appellant

"Jim Brown Law" lawoffice@lojbpa.com
"jim" jim@lojbpa.com

/s/ Steven C. Lefemine
Appellant

PRESS FIRMLY TO SEAL

FSC MIX Board FSC® C116916

PAPER POUCH how2recycle.info

PRESS FIRMLY TO SEAL

UNITED STATES POSTAL SERVICE®

23219

AUG 11, 2025

RDC 07

$31.40

S2324D500594-6

PRIORITY MAIL EXPRESS®

FLAT RATE ENVELOPE

ONE RATE ■ ANY WEIGHT

To schedule free Package Pickup, scan the QR code.

USPS.COM/PICKUP

PS10001000006

EP13F October 2023
OD: 12 1/2 x 9 1/2

UNITED STATES POSTAL SERVICE® | PRIORITY MAIL EXPRESS®

ER 202 483 757 US

CUSTOMER USE ONLY

FROM: (PLEASE PRINT) PHONE (803) 760-6306

Steve Lefemine
PO Box 12222
Columbia, SC 29211

DELIVERY OPTIONS (Customer Use Only)

☐ **SIGNATURE REQUIRED** *Note:* The mailer must check the "Signature Required" box if the mailer: 1) Requires the addressee's signature; OR 2) Purchases additional Insurance; OR 3) Purchases COD service; OR 4) Purchases Return Receipt service. If the box is not checked, the Postal Service will leave the item in the addressee's mail receptacle or other secure location without attempting to obtain the addressee's signature on delivery.

Delivery Options

☐ No Saturday Delivery (delivered next business day)

☐ Sunday/Holiday Delivery Required (additional fee, where available*)
*Refer to USPS.com® or local Post Office™ for availability.

TO: (PLEASE PRINT) PHONE ( )

Clerk of Court
US Court of Appeals for the Fourth Circuit
1100 East Main St., Suite 501
Richmond, VA 23219
ZIP + 4® (U.S. ADDRESSES ONLY)
Attn: Paige Ballard

■ For pickup or USPS Tracking™, visit USPS.com or call 800-222-1811.
■ $100.00 insurance included.

PEEL FROM THIS CORNER

PAYMENT BY ACCOUNT (if applicable)
Federal Agency Acct. No. or Postal Service™ Acct. No.

ORIGIN (POSTAL SERVICE USE ONLY)

☐ 1-Day ☐ 2-Day ☐ Military ☐ DPO

PO ZIP Code	Scheduled Delivery Date (MM/DD/YY)	Postage	
29201	8/12/25	$ 31.40	
Date Accepted (MM/DD/YY)	**Scheduled Delivery Time**	**Insurance Fee**	**COD Fee**
8/11/25	☐ 6:00 PM	$	$
Time Accepted		**Return Receipt Fee**	**Live Animal Transportation Fee**
11:55 ☒ AM ☐ PM		$	$
Special Handling/Fragile	**Sunday/Holiday Premium Fee**	**Total Postage & Fees**	
$	$	31.40	
Weight ☐ Flat Rate	**Acceptance Employee Initials**	$	
lbs. 9 ozs.			

DELIVERY (POSTAL SERVICE USE ONLY)

Delivery Attempt (MM/DD/YY)	Time	Employee Signature
	☐ AM ☐ PM	
Delivery Attempt (MM/DD/YY)	**Time**	**Employee Signature**
	☐ AM ☐ PM	

LABEL 11-B, NOVEMBER 2023 PSN 7690-02-000-9996

PAPER POUCH how2recycle.info

UNITED STATES POSTAL SERVICE U.S. MAIL

UNITED STATES POSTAL SERVICE®