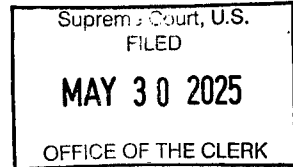


25-5133
No.

ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES



Alexander P. Bebris - PETITIONER

v.

National Center for Missing and
Exploited Children (AKA "NCMEC") - RESPONDENT

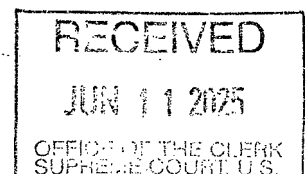
ON PETITION FOR A WRIT OF CERTIORARI TO
UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA

PETITION FOR A WRIT OF CERTIORARI

Alexander P. Bebris
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Federal Correctional Inst.
Danbury, CT.
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FILED PRO SE

May 30, 2025



QUESTION(S) PRESENTED

1. Does an entity, regardless of its method or location of its incorporation, become an "authority" of the United States when; (1) the majority of funding for said entity is provided by the federal government; (2) that entity is specifically named and directed by statute to perform particular functions and actions; and, (3) a subset of the directed statutory mandates include the exercise of power(s) [law enforcement] that have been reserved to the sovereign?
2. If an entity is found to be an "authority" of the United States in meeting question #1 in the affirmative, is that entity subject to the provisions of 5 USC 552 ("The Freedom of Information Act")?
3. Does an entity, regardless of how and where it is incorporated, become a "de facto" agency of the United States under Article II of the United States Constitution where that entity has been granted a special law enforcement authority by Congress?

LIST OF PARTIES

☒ All parties appear in the caption of the case on the cover page.

☐ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

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PETITION FOR WRIT OF CERTIORARI

OPINIONS BELOW

JURISDICTION

☒ For cases from federal courts:

The date on which the United States Court of Appeals decided my case was JANUARY 6, 2025.

☒ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☒ An extension of time to file the petition for a writ of certiorari was granted to and including JUNE 5, 2025 (date) on APRIL, 2025 (date) in Application No. A 205. (BEST OF MY RECOLLECTION)

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1):

PLEASE NOTE: A TIMELY APPLICATION FOR EXTENSION WAS FILED AND APPROVED/GRANTED BY THE CHIEF JUSTICE. SUBSEQUENT TO RECEIPT OF THE ORDER GRANTING THE REQUESTED EXTENSION, THE PETITIONER'S COPY WAS LOST DURING A MOVE OF HIS LEGAL LOCKER AND LEGAL MATERIALS. HE REQUESTS THE INDULGENCE OF THE COURT IN UNDERSTANDING THIS SITUATION.

☐ For cases from state courts:

RESPECTFULLY, *Phil PB*

The date on which the highest state court decided my case was _____.
A copy of that decision appears at Appendix _____.

☐ A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A _____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

United States Constitution
Article II

STATUTES:

5 USC 551
5 USC 552
18 USC 2558A
34 USC 11293 (Orig. 42 USC 5773)

Federalist #77

STATEMENT OF THE CASE

The National Center for Missing and Exploited Children (hereafter "NCMEC") should be properly qualified as a governmental entity and agency of the United States government that discharges the authority of the United States government. The authority that NCMEC discharges and is empowered with is the "police power" or law enforcement power, a power and authority that is an exclusive power and providence of the sovereign. NCMEC is subject to the statutory provisions of 5 USC 551 and 5 USC 552 ("The Administrative Procedures Act" and "Freedom of Information Act".)

REASONS FOR GRANTING THE PETITION

- The District Court, affirmed by the Court of Appeals, improperly and incorrectly dismissed the action(s) of the plaintiff/petitioner and found that the National Center for Missing and Exploited Children was (a) not an authority of the United States Government and not subject to the provisions of 5 USC 551 and 5 USC 552.
- The decision of the Court of Appeals for the District of Columbia (that NCMEC) is not an authority or entity of the United States government is in [apparent] conflict with the 10th Circuit Court of Appeals decision in United States v. Ackerman (831 F. 3d 1292, (2016) which found that NCMEC is both an entity and agency.
- The implication that NCMEC, as currently formed, funded, and operated is unconstitutional under the settled legal concept of the President (as head of the Executive Branch) is the Chief Magistrate of the United States. The authority of this court is required to definitively settle this question.
- Potentially, this decision could effect hundreds of thousands if not millions of American citizens (as NCMEC is processing hundreds of thousands of "CyberTip" reports under its "law enforcement" authority and mandate each week.)
- This court should affirm and strengthen the legal concept that exercise of the "police power" and "exercise of law enforcement authority in all forms is a public function subject to the scrutiny and accountability of the public.

IN THE
SUPREME COURT OF
THE UNITED STATES

Alexander P. Bebris, PETITIONER

V.

Case. No.:

The National Center for Missing and
Exploited Children (AKA "NCMEC"),
RESPONDENT

ON PETITION FOR A WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA

Now comes the petitioner, pro se, before the honorable court with this PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA. The petitioner requests the indulgence of the court as, "A document filed pro se, and a prose complaint, however inartfully pleaded, must be held to less stringent standards than formal pleadings drafted by lawyers." (Erickson v. Pardus, 551 US 89, 94; 127 S. Ct. 2197 (2007)). The petitioner is not an attorney by trade or education.

HISTORY OF THE CASE

In August, 2022, the petitioner made a formal, written request to the National Center for Missing and Exploited Children (hereafter, "NCMEC") for specific information that included specific [computerized] records and copies of agreements. This request was made by the petitioner to NCMEC via US Mail under 5 USC 552

"The Freedom of Information Act", or FOIA.

On September 9, 2022, NCMEC responded to the petitioner via US Mail, declining to respond with the requested documents and records, citing that it, as a private non-profit organization is not subject to the Freedom of Information Act.

The petitioner filed suit against NCMEC in the District Court for the District of Columbia (that court having jurisdiction under the Act), seeking a finding that NCMEC is a covered federal agency as defined by the Act (that NCMEC acted under federal law under a mandate from Congress and exercised the "authority" of the United States in the exercise of functions that are powers reserved to the sovereign (government) [law enforcement]; and an order to compel the production of the documents and records sought by the petitioner.

On February 2, 2024, the District Court dismissed the petitioner's suit with a single page decision (sua sponte) with a single page decision, finding that previously within the District, NCMEC has been determined to be a non-profit, private organization and not subject to FOIA as, "NCMEC's receipt of federal funding is "entirely ancilliary" to its [informatonal] and educational mission."

The petitioner filed a timely appeal with the Court of Appeals for the District of Columbia. On January 6, 2025 the Court of Appeals affirmed the decision of the District Court, opining that, "appellant has not shown that NCMEC possesses the 'authority' necessary for it to qualify as an "authority of the government of the government of the United States under s551(1) [or] the executive

department statues necessary under s. 552 (f)".

This petition is a timely application to this honorable court for certiorari.

NCMEC is Both a Government Entity and Agency

NCMEC is both a governmental agency and entity. Judgement in determining the status and designation of an entity as public or private has been wrestled with by the courts since almost the formation of this nation. In Trustees of Dartmouth College v. Woodward ((17 US (4 Wheat.) 513, 668-69, 4 L. Ed 629) (1819)) Justice Marshall opined that if "an entity is invested with any portion of political power, partaking in any degree of civil government and performing duties that flow from sovereign authority" (id at 634) then an entity would be properly qualified as a governmental entity.

The "Police Function and Sovereign Authority

The "police function" and exercise of law enforcement authority, powers, and duties has long been recognized as one of the few quintessential examples of sovereign function. (see Foley v. Connelie, 435 US 291, 297; 98 S./Ct. 1067, 55 L.Ed 287 (1978)) describing the "police function as one of the most basic functions of government." (id); and "a most fundamental obligation of a government to its constituency." (id) (see also, Williams v. WAMTA, 2021 US Dist LEXIS 263582, and Morris v. WAMTA, 781 F. 2d 218, 220 - "courts undertaking this analysis have consistently cited police and law enforcement activity as exemplars of such quintessential governmental activity.")

The "police function and "law enforcement" are not merely a part of a set of functions with a public nexus or benefit that the government traditionally performed or performs. Functions of such public benefit such as education (there exist both public and private schools) and disaster relief (private organizations such as the Red Cross and Samaritan's Purse engage in disaster response in addition to local, state, and the federal government)

plainly establish that there are some functions that both the sovereign and private (or at least semi-private) entities may provide to the public benefit. The "police power", "police function" and "law enforcement" are different however, than many other public, political, or sovereign functions in that the "police power" is exclusively a function of government. Policing is among a set of "state and municipal functions that have been administered with a greater degree of exclusivity by the states and municipalities." (Flagg Bros. v. Brooks (436 US 149, 98 S. Ct. 1729, 56 L. Ed 2d 185 (1978)) and "private parties do not engage in customs or law enforcement activity." (William T. Peterson and John Henry Miller v. United States of America (CV-284-091, S.D. GA (1986) at 11). "When an actor is endowed with law enforcement powers beyond those enjoyed by private citizens, courts have traditionally found the public-police power engaged." (emphasis added) (United States v. Ackerman (831 F. 3d 1292 (2016), 2016 US App LEXIS 14411, 10th Cir., 2016) quoting Romanski v. Detroit En'mt LLC, (428 F. 3d at 637-38, 6th Cir., 2005). Entities do not become governmental entities merely because they are engaged in work that has a public benefit or nexus. Entities are transformed when that entity engages (empowered statutorily by the sovereign) authorized activity and exercises authority that has been the exclusive providence of the sovereign. To this end, and under this analysis, NCMEC cannot be considered a private entity.

Law Enforcement Activity

While the term "law enforcement activity" or "law enforcement function" have not been specifically defined, court(s) have interpreted this phrase broadly to include "an authorized criminal, intelligence, or administrative investigation."

(Nagel v. Dept. of Health, Education, and Welfare, 725 F. 2d 1438, 1441, n.3; 233 US App 332 (DC Cir., 1984). Nor is the term limited to an active, on-going, specific target or investigation. "Valid law enforcement activities require neither an active investigation nor a 'current law enforcement necessity.'" (Roderick MacArthur Found. & Lindblom v. FBI (102 F. 3d 600, 603 322 US App D.C. 202 (D.C. Cir., 1996)

NCMEC's Authority: Granted by Congress to Project Sovereign Authority

It is beyond dispute that NCMEC has been authorized, empowered, and funded by Congress with law enforcement powers that extend well beyond those enjoyed by private citizens or entities and diligently exercises those powers and functions to fulfill its Congressional mandate in a role effectively as a (de facto) (federal) police agency. These law enforcement powers are granted and commanded primarily (but not exclusively) through two federal statutes, 18 USC 2558A and (originally 42 USC 5773(b)) and 34 USC 11293. (NOTE: the compiler of the US Code moved 42 USC 5773 to 34 USC 11293.) "The Federal statutes governing NCMEC by Congressional mandate effectively amount to a statutory grant of a special law enforcement authority to a single entity and no other, authorizing it and encouraging it to perform functions that no other private person or entity may lawfully undertake." (United States v. Ackerman, supra.)

Through these statutes, Congress has (by law, with the full authority of the United States) mandates that NCMEC perform law enforcement functions and collaborate with other federal law enforcement agencies in numerous ways. Additionally, many of the law enforcement duties tasks, functions, and responsibilities are mandated to NCMEC and NCMEC alone - no other private or public entity or 'private person' not even to any other law enforcement or governmental entity or agency. These include (this list is not exhaustive):

Operation of the official national clearinghouse for missing and exploited children; to act in concert with law enforcement agencies attempting to recover missing and exploited children; to provide highly technical and investigative services to help identify patterns of child abductions for law enforcement purposes; identifying and tracking non-compliant sex offenders; and operation of the CyberTip line as a means of combatting internet child exploitation^[1]. Congress has additionally authorized NCMEC to both maintain and electronically transmit child sex abuse material (CSAM) as part of law enforcement functions and activities.

The investigation, monitoring, and tracking of registered sex offenders is an exclusive function of public authority.

"The monitoring of registered sex offenders is inherently a public function." Jones v. County of Suffolk, 164 F. Supp 3d at 397 E.D.N.Y. (2016). This evidenced by the regulatory scheme designed to monitor sex offenders that began with SORA, which as enacted in 1996 to monitor sex offenders through registration and notification requirements and to classify sex offenders." (see Wallace v. New York, 40 F. Supp 3d 278, 289-99 (E.D.N.Y 2014)" Jones v. County of Suffolk, 2018 US Dist LEXIS 73580 E.D.NY (2018))

Via 34 USC 11293, NCMEC is both mandated and funded to (assist) and (perform) this functional that has been deemed and found to be inherently "public" and a projection of public authority. To this end, NCMEC has created (and has funded through the Department of Justice) a "Sex Offender Tracking Team", this "team" is a member and participant in the "National Sex Offender Targeting Center" and interagency-(emphasis added) intelligence and operations center created by the US Marshal Service.^[2]

Congress has also mandated the 'reverse' relationship - that is that law enforcement must report to, work with, and liason with NCMEC^[3]. It would seem to be an unreasonable assumption that Congress would require governmental authorities (including federal law enforcement entities) - agents of the

sovereign itself to either report to (or require such liaison activity) and maintain, and share sensitive, confidential, and investigatory (law enforcement) information to a purportedly "private" entity - unless that entity has been granted the authority of the sovereign as well. The granting and endowment of this authority to NCMEC by Congress consequently creates not only a de facto agency and entity of the government, but the corresponding accountability and public scrutiny that accompanies such granting of power and authority.

Effective Governmental Control of NCMEC: Engagement of Federal Law Enforcement in NCMEC Functions and Duties & Funding

Congress wields a significant and substantive control over NCMEC's day-to-day operations and functions by statutorily mandating and directing a majority of NCMEC's responsibilities and duties (to include the performance of public, law enforcement functions), funds those duties, actions and responsibilities, and has authorized other federal law enforcement officers and agents to perform NCMEC work and function on NCMEC facilities and areas. The law that provides for NCMEC's (federal) funding specifically refers to these mandated functions and activities as "duties and responsibilities under federal law."^[4]

Operationally, on-a day-to-day basis, employees and sworn law enforcement agents of other federal law enforcement agencies and executive branch departments have both offices and perform work alongside NCMEC employees - providing direct support (and in some cases, directly producing NCMEC work product) on tasks to carry out NCMEC's Congressionally mandated functions. "NCMEC works closely with federal agencies, some of which have detailed agents and analysts to work at NCMEC part-time or full-time^[5] These personnel include and encompass representatives from the Federal Bureau of Investigation (FBI) including a Supervisory Special

Agent (SSA) whose duties and responsibilities include the "coordination of the use of both FBI and NCMEC resources and facilitate... the most effective response to child pornography and other cases," and an embedded intelligence analyst whose function is to "address CyberTips and "supports" the Child Victim Identification Program. [6]. The United States Postal Inspection Service (USPIS) has at least two law enforcement agents posted at NCMEC facilities. These agents are issued NCMEC email addresses and have their official US Mail addressed to NCMEC to discharge their own law enforcement duties and responsibilities. (These facts were communicated directly to the plaintiff by the United States Postal Inspection Service in a separate Freedom of Information Request to that agency.) In daily operations, functions, and control, where there may have at some time in the past been a clear boundary line between [work output and function] NCMEC and its federal 'partners', this line has become indistinguishable.

In its dismissal (at the District Court) and affirmation at the Circuit of the plaintiff's action, the lower courts of that circuit relied upon both Lazaridis v. United States Department of Justice (713 F. Supp 2d 64 D.D.C. 2010) and Dong v. Smithsonian Inst., (125 F. 3d 877, 326 US App D.C. 350, D.C. Cir., 1997). The District Court relied on a foundational pillar of Lazaridis, finding that "NCMEC's and IMEC's connections to the executive branch are much more remote than the Smithsonian's." (Lazaridis, supra., in analyzing the facts and circumstances of NCMEC vis-a-vis the Smithsonian (in Dong), that found that, in spite of a significant relationship with the Federal Government, the Smithsonian was not a federal entity or agency.) This reliance upon Lazaridis and Dong is misguided and no longer supported by the facts and scrutiny of the now intricate intertwining of the work of NCMEC, its relationships with other federal law enforcement, its funding mech-

anism(s), and statutory mandate to execute powers and functions of the sovereign. The district court, in Lazaridis, painted a picture of an arms-length, distant, and remote relationship between NCMEC and the [Executive Branch] of the federal government. The reality is that this fictional image of distance could not be further from the truth. The actuality is that NCMEC operations and operations of other federal law enforcement are overlapping to the point where federal officers and law enforcement agents are not only deployed to NCMEC, but produce NCMEC work output and work product.

In the same law that mandates the functions and duties that NCMEC is required to perform, Congress funds and financially supports the execution of those duties. (Some functions, such as the "Sex Offender Tracking Team" are funded at 100% by the government.) The plain language in the funding portion of the statutes also indicates that this funding is non-discretionary in either providing this funding and commensurately, that this funding is non-discretionary in its uses by NCMEC. The applicable statutes dictate that annually a grant "shall be made" to NCMEC and that the federal funds "shall be used" by NCMEC to carry out more than a dozen, itemized, enumerated, and detailed functions.^[7] Quite obviously, NCMEC is not simply a grantee and recipient of federal funding that "appears to be no different from any private [organization] which receives federal funding and enjoys some control over their use." (Lazaridis, supra.) NCMEC is required to receive specific federal funding, which in turn, NCMEC must spend to perform specific duties, functions, and tasks.

The control of (a.) the mandating of particular duties, tasks, and responsibilities to NCMEC, (b.) the granting of statutory authority of the sovereign to carry out those functions; in (c.) control of the funding to carry out those assigned duties and tasks gives the government an effective control

over NCMEC through the "power of the purse", much like this court found in Dept. of Transp. v. Ass'n of AM RRS (191 L. Ed 2d 153, 135 S. Ct. 1225 (2015)). "Given the combination of these unique features, and significant ties to the government, Amtrak is not an autonomus private enterprise." (DOT, supra.) Consistently, since 2012, the federal government has provided at least 75% of NCMEC's annual budget [8]. Realistically, without the financing and funding of the government provided to NCMEC, it is unlikely that NCMEC would exist in anything close to its current form or have the ability to carry out its Congressional mandates.

Delving deeper into an assessment of the relationship between the Congressionally mandated functions of NCMEC and the funding nexus destroys an additional portion of the legal foundation of the District Court's decision in Lazaridis, the very tenet that the District Court utilized to dismiss the complaint of the petitioner/plaintiff: "NCMEC's receipt of federal funding is 'entirely ancilliary to its [informational] and educational mission.'" (see decision in 1:23-cv-03715 UNA, quoting Lazaritis (supra.)) This court should consider the plain meaning of that finding. "In determining the 'plain meaning' of a word, we may consult dictionary definitions, which we trust to capture the common contemporary understandings of the word." (United States v. Flores (729 F. 3d 910, 914 (n.2) (9th Cir., 2013); "the meaning of a word depends on the circumstances in which it is used. To strip a word of its context is to strip that word of its plain meaning." (Biden v. Nebraska, 600 US 477, 143 S. Ct. 2355, 2378; 216 L. Ed. 2d 1063 (Barrett, J. concurring) (2023)). Plainly, in comparing the plain language of the empowering [including the delegation of authority] statutes, the enumeration of the required duties and

functions of NCMEC, and the accompanying federal funding - no reasonable person could reach a conclusion that NCMEC's primary mission is to either "inform" or "educate", nor is governmental support ancillary in nature.

NCMEC and Amtrak: Through the Lens of "Lebron" and "DOT"

~~NCMEC~~ This court in Lebron v. National RR Pass. Corp. (513 US 374; 115 S. Ct. 961; 130 L. Ed 2d 902 (1995) and "DOT" (supra.) promulgated clear considerations for the lower courts in determination if an entity constitutes a "governmental entity". "The court proceeded to examine the level of governmental control over Amtrak, the broad statutory mandates to which it was subject, its dependence on federal funding, the purpose behind its creation, and the benefits it conferred on the government." (United States v. Ackerman (supra.) referencing and summarizing the court's analysis under Lebron and DOT: "in the end, the court held that the 'combination' of these considerations conspired to suggest that Amtrak was indeed a governmental entity (id)". Importantly, the court(s) considered these characteristics in the aggregate and not in any individual context, instead the 'totality of the circumstances'. Placing NCMEC under the same lens can lead to only one conclusion and answer: NCMEC is a governmental entity, empowered and discharging its duties with the full force and authority of the sovereign. The petitioner would further add to this that NCMEC is further differentiated from Amtrak as it (NCMEC) discharges a power and authority ("the police power") that is exclusively reserved and executed by the sovereign itself.

The Power and Authority of the Executive as 'Chief Magistrate'

The 10th Circuit Court of Appeals in United States v. Ackerman (supra.)

conducted just such an analysis as the petitioner/plaintiff suggests would be proper and appropriate in examining and analyzing NCMEC. In Ackerman, the 10th Circuit opined that, "recent Supreme Court decisions fortify our conviction that NCMEC qualifies as a governmental entity" and "Given all this and as a matter of analogistic reasoning, it's difficult to see how a quasi-public corporation like Amtrak (a mere utility, really) might qualify as a governmental entity while NCMEC, an entity afforded so many unique law enforcement powers, might not." (id.)

The only question that remains in this instant case before this court (if the position of the 10th Circuit in Ackerman is to be affirmed vis-a-vis the finding and reasoning(s) of the District of Columbia Circuit) is to determine where within the federal governmental structure that NCMEC exists. Clearly and plainly as an entity or instrumentality of the government it must exist within the Executive branch. It would be illogical to make any determination that it exists or functions under Article I of the Constitution (it has no legislative or rule-making authority delegated) or Article III (it performs no judicial functions). NCMEC does, however, have delegated and exercises the law enforcement and police power - a power that has been reserved and delegated to the Chief Executive as the Chief Magistrate of the republic.

Even before the final ratification of the Constitution in 1787, the President and his office have long been recognized as the Chief Magistrate of the United States. (see also Federalist #77). A long string and line of cases have buttressed this foundational concept. The duties and powers of the Office of the President are expressly encompassed in Article II.

The duties and responsibilities are also enumerated and encompassed in the oath of office for the President, which includes that oath to "take care that the laws be faithfully executed." (Article II, United States Constitution) Plainly and clearly, the Executive power and authority of our government is vested in the office - as enumerated under Article II. Importantly, the President, as Chief Executive, is vested with all of the Executive Power of the United States - not just some of it, and through his oath has the solemn power and authority to execute all of the power and authority of the office. Additionally, in the specific wording of the Oath of Office, the President is vested and responsible for the faithful execution of all of the laws of the United States - not just some of them. Commensurate with this vested authority and responsibility (the "Chief Magistrate") for law enforcement, logically comes the appropriate ability, power, and authority for oversight (and direct and indirect control) for all aspects of the government that have power to discharge that power of the sovereign authority. It would be both illogical and unconstitutional for Congress to delegate (or otherwise empower) an entity of the federal government with the "police power" or law enforcement power of the sovereign without the President (as Chief Executive and Chief Magistrate) having oversight, control, and (ultimately) responsibility for that entity.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,



Date: May 30, 2025

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ENDNOTES

1. 34 USC 11292 (b)
2. (emphasis added), Missing and Exploited Children's Program, p. 12
3. 34 USC 41308
4. United States v. Ackerman, (supra)
5. Missing and Exploited Children's Program, p. 13
6. United States v. Ackerman, endnote 4 (supra) ; United States v. Keith (980 F. Supp 2d 33, 41 (D. Mass.)(2013)); US Dept. of Justice, Office of Juvenile Justice & Delinquency Prevention, Federal Resources on Missing and Exploited Children p 21-24 (6th ed., 2011)
7. 34 USC 11292 (a & b)
8. United States v. Ackerman (supra), also: Deposition of John Sheehan, case no. 19-cr-2 (ED of WI), Motion to Suppress 12-05-19. (Mr. Sheehan is the Vice President of NCMEC).