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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

JOSEPH KIRCHNER,
Plaintiff,

Case No. _____

vs.

**NOTICE OF PENDING, REFILED,
RELATED OR SIMILAR ACTIONS**

ALEXANDER ACOSTA, et al.,
Defendants.

RELATED CASES

Case 1: Kirchner v. Johnson

Field	Information
Case Name	<i>Kirchner v. Johnson, et al.</i>
Court	United States District Court for the District of Columbia
Case Number	1:25-cv-02735-ACR
Judge	Hon. Ana C. Reyes
Filing Date	August 19, 2025
Status	Pending

Case 2: Kirchner v. Ellison

Field	Information
Case Name	<i>Kirchner v. Ellison, et al.</i>
Court	United States District Court for the District of Minnesota
Case Number	0:26-cv-00726-JWB-ECW
Judge	Hon. Jerry W. Blackwell
Magistrate Judge	Hon. Elizabeth Cowan Wright
Filing Date	January 27, 2026
Status	Pending

RELATIONSHIP TO PRESENT ACTION

A. Common Plaintiff and Analytical Framework

1. Joseph Kirchner is the plaintiff in all three actions.
2. All three cases apply the **Madisonian Separation of Powers Objective Compliance Test** (MEMO B) to identify constitutional violations through the same six-step analytical framework, demonstrating the test's universal applicability across federal and state constitutional contexts.

1 **B. Kirchner v. Johnson (D.C.) — Federal Executive Branch Violations**

2 3. The D.C. case documents ongoing federal executive conduct that this
3 complaint cites as evidence, including:

- 4 • Attorney General Bondi's refusal to investigate Cabinet-level testimony regarding
5 Epstein operations
6 • FBI Director Patel's identification of the 2008 immunity grants as the "original
7 sin" underlying current institutional dysfunction
8 • Coordinated abandonment of fraudulent "credible evidence" framework upon
9 judicial scrutiny
10 • Statistical analysis proving coordination under *Interstate Circuit* standards

11 4. This complaint requests judicial notice of D.C. case filings pursuant to Fed.
12 R. Evid. 201(b)(2).

13 **C. Kirchner v. Ellison (Minnesota) — State Executive Branch Violations**

14 5. The Minnesota case demonstrates the **systematic pattern** of separation of
15 powers violations across governmental levels. While involving different subject matter
16 (state attorney general statutory authority), the case:

- 17 • Applies the identical Madisonian six-step test to state constitutional structure
18 • Documents executive branch officials exceeding enumerated authority
19 • Establishes that separation of powers violations follow predictable patterns
20 identifiable through objective textual analysis

21 6. The Minnesota case is referenced in this Petition as evidence that separation
22 of powers violations are not isolated incidents but systematic failures requiring judicial
23 adoption of an objective compliance test.

24 **D. Different Defendants, Complementary Claims**

25 7. Each case names different primary defendants:

- 26 • **This case:** Alexander Acosta (individual capacity) and Attorney General (official
27 capacity)
28 • **D.C. case:** Speaker Johnson, Attorney General Bondi, FBI Director Patel, and
29 others

1 • **Minnesota case:** Attorney General Keith Ellison and Governor Tim Walz

2 **8. No risk of inconsistent judgments:** The cases address distinct governmental
3 actors and time periods while sharing a common analytical framework that courts can
4 apply consistently.

5 **E. The Constitutional Pattern**

6 **9.** Collectively, these cases demonstrate that separation of powers violations
7 occur at federal and state levels, across executive branch functions, when officials
8 exceed enumerated authority without objective judicial standards to identify and
9 remedy such exceedances. This pattern supports the urgent need for judicial adoption
10 of the Madisonian Objective Compliance Test proposed in MEMO B.

11 **CERTIFICATION**

12 Plaintiff certifies that this Notice is filed in good faith compliance with Local Rule 3.8
13 and that Plaintiff will continue to notify this Court of any additional related actions that
14 come to Plaintiff's attention.

15 **Respectfully submitted,**

16 **JOSEPH KIRCHNER**

17 *Pro Se Plaintiff*

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22 **DATED:** March 13, 2026
23
24

25 **CERTIFICATE OF SERVICE**

26 I hereby certify that on _____, 2026, I served a true and correct copy of
27 the foregoing **NOTICE OF PENDING, REFILED, RELATED OR SIMILAR**
28 **ACTIONS** upon all parties via the same method of service as the Complaint.
29
30

31 **JOSEPH KIRCHNER**

32 *Pro Se Plaintiff*