

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

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Brian P. Carr,  
Rueangrong Carr, and  
Buakhao Von Kramer  
Plaintiffs  
versus  
United States,  
US Department of Justice,  
USPS, USPS OIG, USPS BoG,  
US CIGIE, Department of State,  
Department of State OIG,  
USCIS, DHS OIG, and SSA  
Defendants

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Civil No. 3-23CV2875 - S

Verified<sup>1</sup> Brief of Mr. Carr  
Duties of IG and DoJ to  
Enforce Lawful Statutes and the  
Constitution

**Duties of IG and DoJ to Enforce Lawful Statutes and the Constitution**

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<sup>1</sup> The Verification of this document is at the end of this document.

## Introduction

This brief will discuss the duties and responsibilities of the various Inspector Generals: USPS, DoS, USCIS (DHS OIG), and IRS (TIGTA), each of which contributed to the damages we suffered through their negligence.

There will be a discussion of the duties of an IG which includes supporting the constitution and preventing abuse in the form of violations of individual constitutional rights. This is a very broad mandate which in this case narrows to the requirement of due process or a fair hearing before depriving any person of life, liberty, or property.

The second paragraph of the complaint (ECF 29) discusses due process and its different facets citing sources which discuss due process in great depth. However, the facet of due process most relevant to this matter is the requirement of a written decision based on the evidence presented and the relevant statutes.

There is also a very specific requirement for IG's to report federal crimes to the Attorney General (or DoJ) which in this matter is often the crime of falsification of government records or [18 USC § 1001](#). [18 USC § 1001](#) is very broad and includes concealing a material fact. If a written decision (required for due process) omits (conceals) material evidence then this is *prima facie* basis for the crime of falsification of government records and must be reported to DoJ.

Once a plausible federal crime has been reported to the DoJ, the DoJ is only required to monitor the investigation and resolution and can refer the matter back to the OIG which can refer the matter to another party, even local management.

While prosecution of federal crimes has been reserved to DoJ, a key advantage of this organization is to allow DoJ to use the threat of prosecution as a cudgel to expediently insure future compliance with the law. Proper convictions and incarceration are expensive and time consuming whereas immunity in exchange for testimony and plea deals can often lead to prompt resolution and future compliance with minimal delay and expense. Such plea deals can be implemented through the OIG and local management under the guidance of the DoJ.

### **Duties of Each Inspector General (IG)**

The duties and responsibilities of each of the different Inspector Generals was defined in the [IG Act of 1978](#) which is now [5 USC § 404](#) which states:

- (a) In General. - **It shall be the duty and responsibility of each Inspector General**, with respect to the establishment within which the Inspector General's Office is established -
  - (1) to provide policy direction for and to conduct, supervise, and coordinate audits and investigations relating to the programs and operations of the establishment;
  - (2) to review existing and proposed legislation and regulations relating to programs and operations of the establishment and to make recommendations in the semiannual reports required by section 405(b) of this title concerning the impact of the legislation and regulations on the economy and efficiency in the administration of programs and operations administered or financed by the establishment, or the prevention and detection of fraud and abuse in the programs and operations;
  - (3) to recommend policies for, and to conduct, supervise, or coordinate other activities carried out or financed by, the establishment for the purpose of promoting economy and efficiency in the administration of, or **preventing**

**and detecting fraud and abuse in, its programs and operations; ...**

**(d) ... each Inspector General shall report** expeditiously to the Attorney General whenever the Inspector General has reasonable grounds to believe there has been **a violation of Federal criminal law.**<sup>2</sup>

Each individual Inspector General position is created with respect to an agency or group of agencies which are referred to as ‘the establishment’ above, e.g. USPS IG is further defined within 39 USC (Postal Service) and TIGTA (the IRS IG) is defined within 26 USC Internal Revenue Code.

Each IG has multiple responsibilities as listed above, but we will focus on preventing and detecting abuse as well as reporting federal crimes within the framework of their monitored agencies.

### **IG Oath of Office, Support and Defend the Constitution**

#### **Protect Individual Rights**

The oath of office for federal office holders is generally specified in 5 USC § 3331 which states:

I, ..., do solemnly swear (or affirm) that **I will support and defend the Constitution** of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter. ...<sup>3</sup>

Indeed, every federal government agent (be it officer, employee, or contractor) must support and defend the constitution. This means obeying the constitution (not

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<sup>2</sup> Bold added by Plaintiffs.

<sup>3</sup> Bold added by Plaintiffs.

depriving individuals of constitutional rights such as due process) but also defending the constitution by opposing all violations (of constitutional rights among other things).

Further, supporting and defending the constitution extends to all lawful statutes which are the embodiment of the constitution (not just a piece of paper in the National Archives).

### **Report Federal Crimes**

#### **Falsification of Government Records Threatens Government of Law**

The different IG's each have a clear and specific to report all federal crimes to the DoJ as shown above as well as supporting and defending the constitution.

In the count against each IG, there is the crime of falsification of government records.

18 USC § 1001 states:

- (a) Except as otherwise provided in this section, whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully -
  - (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;
  - (2) makes any materially false, fictitious, or fraudulent statement or representation; or
  - (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry;

shall be fined under this title, imprisoned not more than 5 years or, ...

This is a very broad statute covering not only government agents but also any individual submitting claims or statements to the government. The government routinely uses this statute to insure individuals don't make false claims to the government (often using the threat of prosecution to insure future compliance).

This statute is also one of the foundations of our government of law where issues are decided by reviewing the law and evidence (accurate documents about what happened). The alternative is 'strong man rule' where the person with the most power (strongest gang) resolves any disputes based on whatever is most advantageous to their interests. Resolution of disputes through rules or the law depends on accurate records and falsification of government records is one of the first steps toward tyranny.

### **Each Defendant IG Failed to Report Falsified Records**

There is a separate brief describing the claim against each IG, but below is a table of the records which were falsified by the monitored agency and which were not properly reported to DoJ for prompt correction.

Monitored Agency	Falsified Records Reported to IG	Responsible IG
USPS	Delivery times and refund payment	USPS IG
DoS	Visa Denial (omitted or concealed evidence considered and reason for denial in video record)	DoS IG
USCIS	False record of application status and omitted or concealed evidence in denial decision	DHS IG
IRS	Seizure of property notice without statute mandated 30 day notice	TIGTA

### **Summary**

Each of the defendant IG's had a duty to support and defend the constitution with particular attention to individual constitutional rights such as due process. Each defendant IG failed to protect these individual rights when abuses were reported to them.

Further, I reported the federal crimes of falsifying government documents to each defendant IG and they apparently did not promptly report the crimes to the DoJ so that DoJ could assist in the correction of the documents as well as the damages which resulted.

This court is asked to order the defendant IG's to assist in the correction of monitored agency corrected implementation of due process with particular attention to insuring government records are complete and accurate.

Respectfully submitted,

### **Verification of Document**

Mr. Carr hereby affirms under penalty of perjury in both the United States and Thailand that as an individual:

1. I have reviewed the above affirmation and believe all of the statements to be true to the best of my knowledge.
2. I have reviewed the associated documents and exhibits and believe them to be true and accurate copies with the exception of the documents identified as being redacted. The redacted documents have only been altered to remove sensitive personal information or other redactable information (as cited in the redaction) according to normal redaction procedures.

I hereby reaffirm that the above is true to the best of my knowledge under penalty

of perjury in both the United States and Thailand.

/s Brian P. Carr

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Brian P. Carr  
1201 Brady Dr  
Irving, TX 75061

Date: 28. Jul. 2025  
Location: Irving, Texas

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