

ARTICLE

## Anti-state movements in Poland and their impact on the public and banking sectors

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### Abstract

The purpose of this article is to present contemporary anti-state circles in Poland that are inspired by the US sovereign citizen movement. The author discusses their ideology, the methods of operation used, scale of popularity and the threats they may potentially pose to the legal and social order in Poland. In the study, the author used a review of scientific literature method, as well as an analysis of propaganda and pseudo-legal materials published by Polish anti-government organisations. Polish sovereign citizen movements, such as Zawodowy Polak (Professional Pole) or Ruch II RP (the Second Polish Republic movement) movements, have been shown to adapt the US methods to local contexts. The author presented proposals for preventive measures that could limit the impact of these movements on Polish society and provide better protection for state structures, including the banking sector. He also suggested implementing educational and legislative measures as well as monitoring the activities of these groups.

### Keywords

anti-state movements, sovereign citizens, pseudo-law, radicalisation, state destabilisation

## Introduction

The sovereign citizen movement is an anti-government social phenomenon that grew out of the US anti-tax movements as well as the radical and racist anti-state organisations of the 1960s and 1970s<sup>1</sup>. As it developed, its proponents began to use what is known as pseudo-law, i.e. a set of fictitious procedures and legal arguments, in order to undermine the existing legal order. The movement's supporters, in order to avoid obligations to the state, such as paying taxes, fines or other administrative obligations, formulate complicated, often baseless letters and carry out pseudo-legal actions. They believe that in this way they will block or at least delay the application of the law against them<sup>2</sup>.

The sovereign citizen movement is being treated with increasing seriousness by the US authorities. The Federal Bureau of Investigation (FBI) took note of the aggressive behaviour of its members and classified it as a terrorist and extremist movement in 2010<sup>3</sup>. Research by US psychiatrists also confirms that sovereign citizen movement is one of the largest anti-government or domestic terrorism-related groups in the United States. Between 2014 and 2024, more than a dozen public officials were injured or killed by those adhering to the sovereign citizen ideology. Research using Terrorist Radicalization Assessment Protocol (TRAP-18) has shown that there is a link between behavioural characteristics of members of this movement and an increase in the risk of escalation of violence. After analysing both violent and non-aggressive behaviours of people associated with the sovereign citizen movement, it was found that the sum of scores in the TRAP-18 is a good indicator of an individual's predisposition for terrorist activity. This especially concerns so-called lone wolves – terrorists who independently plan and organise terrorist attacks. Therefore, it is worthwhile to develop research on the use of TRAP-18 in assessing threats posed by groups that exhibit tendencies toward violence<sup>4</sup>.

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<sup>1</sup> S.A. Kent, *Freemen, Sovereign Citizens, and the Challenge to Public Order in British Heritage Countries*, "International Journal of Cultic Studies" 2015, no. 6, <https://skent.ualberta.ca/wp-content/uploads/2015/06/Freemen-Internl-J-of-Cultic-Studies.pdf>, pp. 1–15 [accessed: 25 X 2024].

<sup>2</sup> A. Morozov, R. Bruinsma, J. Rudnick, *Assembly of viruses and the pseudo law of mass action*, "Biophysical Journal" 2009, vol. 96, no. 3, pp. 419a–420a.

<sup>3</sup> FBI, *Domestic terrorism. The Sovereign Citizen Movement*, 13 IV 2010, [https://archives.fbi.gov/archives/news/stories/2010/april/sovereigncitizens\\_041310/domestic-terrorism-the-sovereign-citizen-movement](https://archives.fbi.gov/archives/news/stories/2010/april/sovereigncitizens_041310/domestic-terrorism-the-sovereign-citizen-movement) [accessed: 15 XII 2024].

<sup>4</sup> D.J. Challacombe, P.A. Lucas, *Postdicting violence with sovereign citizen actors: An exploratory test of the TRAP-18*, "Journal of Threat Assessment and Management" 2019, vol. 6, no. 1, pp. 51–59. <https://doi.org/10.1037/tam0000105>.

According to FBI reports, representatives of the movement have repeatedly used violence, including murders<sup>5</sup> and physical assaults. They have been known to threaten judges, law enforcement officers and employees of state institutions<sup>6</sup>, committed financial fraud<sup>7</sup> and used forged documents, including passports, licence plates, driver's licences and counterfeit money<sup>8</sup>. The members of the movement also impersonate police officers or diplomats and thus try to obtain undue privileges or immunities.

In Poland, movements of an anti-state or alt-state nature<sup>9</sup> have begun to emerge over the last few decades. In many cases, they are inspired – consciously or not – by the US sovereign citizen movement both in ideological and organisational terms. In the first years of transition in Poland, isolated initiatives of this type were recorded, such as the activities of Marek Świętopelk-Zawadzki, marginal in nature. Earlier, during the People's Republic of Poland, these types of movements did not emerge due to limited access to information from abroad and the lack of favourable political and social conditions. Ideologically similar activities, such as those of Juliusz Nowina-Sokolnicki – from whom Jan Potocki, the founder of the Ruch II RP described later in the article, draws his legitimacy – were developing in exile at this time.

It is only in the 21<sup>st</sup> century that anti-state movements have started to show more activity. This was particularly evident during COVID-19 pandemic. The introduction of restrictions and the shutdown of many sectors of public life and the economy caused frustration in the society and led to growing opposition

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<sup>5</sup> *Murder of Dallas Police Officer Marks Latest in String of Violent Sovereign Citizen Encounters with Law Enforcement*, Anti-Defamation League, 9 XII 2024, <https://www.adl.org/resources/article/murder-dallas-police-officer-marks-latest-string-violent-sovereign-citizen> [accessed: 1 I 2025].

<sup>6</sup> FBI's Counterterrorism Analysis Section, *Sovereign Citizens. A Growing Domestic Threat to Law Enforcement*, FBI Law Enforcement Bulletin, 1 IX 2011, <https://leb.fbi.gov/articles/featured-articles/sovereign-citizens-a-growing-domestic-threat-to-law-enforcement> [accessed: 1 I 2025].

<sup>7</sup> IRS Criminal Investigation, *Sovereign citizen sentenced to 9 years in prison for \$3.4 million tax fraud scheme, filing a false lien, and absconding while on bond*, Press Release, 22 V 2024, <https://www.irs.gov/compliance/criminal-investigation/sovereign-citizen-sentenced-to-9-years-in-prison-for-3-point-4-million-tax-fraud-scheme-filing-a-false-lien-and-absconding-while-on-bond> [accessed: 1 VII 2025].

<sup>8</sup> C. Meyer, *5 Common Crimes Committed by Sovereign Citizens*, Police1, 6 IX 2024, <https://www.police1.com/community/articles/5-common-crimes-committed-by-sovereign-citizens-1KKxo-42li5FVeANM/> [accessed: 1 I 2025].

<sup>9</sup> The author introduces this term for the purposes of the article. By alt-state movements, he means not only those that challenge the legality of the authorities and the legal order but also those that attempt to create their own states within the state, with their own documents, symbols, offices or laws. A characteristic feature of these movements is their aim to ignore the state order or to replace it with a parallel structure based on their own rules.

to the state apparatus of control. The sovereign citizen movement took advantage of this moment, offering an alternative rhetoric of freedom and a narrative in which the state is portrayed as an oppressive structure lacking genuine legitimacy.

In Poland, sovereign citizen organisations remain a niche phenomenon. However, their popularity and tendency towards radicalisation are increasing. Supporters of these groups question the legitimacy of the Polish authorities and introduce their own structures, i.e. alternative authorities, courts, they create their own model documents and legal arguments, which they use to hinder the work of public institutions and to voice opposition to law enforcement authorities. According to the author, these activities are increasingly taking on an organised character and attracting new supporters, mainly through the internet, where these groups spread scepticism towards the law and those in power.

The author discusses the ideological roots of Polish sovereign citizens, their methods of operation and their impact on the order in state. He also outlines how these movements in Poland adapt the US models to domestic context and what communication strategies and tools they use in their activities. He presents the origins and recent activities of selected sovereign citizens groups, as well as methods they use to spread propaganda. He also proposes preventive measures that could limit destabilising impact of sovereign citizens initiatives on the functioning of state institutions, including legislative changes and strategies for responding to potential threats arising from their activities. Moreover, he discusses proposals for legal regulations aimed at combating anti-state propaganda and protecting society from the influence of ideologies related with the sovereign citizen movement.

### **The beliefs and pseudo-legal methods of the sovereign citizen movement**

Pseudo-law, which is one of the foundations of the sovereign citizen movement, has developed as a distinctive and complex system of methods and beliefs in the literature even described as an esoteric or magical system<sup>10</sup>. Its aim is to destabilise state institutions and avoid legal responsibility by the movement's supporters. It involves, among others, the creation of documents and letters with absurd content, which are submitted to offices with the belief that they have legal force. The movement's representatives assume that through the right choice of words, the structure of the text, as well as the form of the signature, one can symbolically and legally

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<sup>10</sup> It is not a uniform set of principles, it encompasses a variety of practices, techniques and beliefs that are often contradictory.

separate oneself from the state system. Documents prepared by supporters of the movement are often signed in red ink to signify that the signatory is a physical and real ‘flesh and blood person’, as opposed to a signature in black or blue, which is supposed to signify a ‘legal person’ or ‘legal fiction’<sup>11</sup> (the differences between a natural person and a legal person are presented in Table 1). The use of the red colour refers to the practice in some US states of marking important documents. It is treated almost like a magical symbol that distinguishes the real human being from the abstract legal entity.

**Table 1.** Differences between a legal person and a natural person according to sovereign citizen ideology.

|                     | Legal person                                                                                                                  | Natural person                                                                       |
|---------------------|-------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------|
| Name in English     | <i>strawman, legal person, corporate entity, fictional entity</i>                                                             | <i>natural person, living man/woman, living soul, flesh and blood human</i>          |
| Character           | fictitious identity created by the state                                                                                      | real, living being                                                                   |
| Spelling (examples) | capital letters, e.g. JAN KOWALSKI                                                                                            | with a note before the name, e.g. Jan from the Kowalski family, often written in red |
| Source of existence | birth certificate, registration in the country                                                                                | birth                                                                                |
| Legal subordination | is subject to public law (administrative, tax etc.)                                                                           | is subject only to common law                                                        |
| Status by country   | recognised as a citizen, taxpayer, legal entity                                                                               | not recognised as a separate legal entity (according to ideology, but not in law)    |
| Representation      | is represented by a PESEL number (personal identification number), NIP number (tax identification number), official documents | free entity that has no official representation                                      |
| Entity type         | legal structure, social construct, such as a company or a partnership                                                         | person with a soul, capable of sovereign action                                      |

Source: own elaboration.

<sup>11</sup> *The Sovereigns: A Dictionary of the Peculiar*, Southern Poverty Law Center, 1 VIII 2010, <https://www.splcenter.org/fighting-hate/intelligence-report/2010/sovereigns-dictionary-peculiar> [accessed: 14 VII 2024].

The distinction between a legal person and a natural person, which is one of the movement's dogmas, relates to the strawman theory, according to which every human being has two persons: a legal and a physical person, and that legal obligations and tax liabilities apply only to the former<sup>12</sup>. Supporters of this theory believe that by using appropriate forms of signature, such as John Robert: Doe in place of the commonly used John Robert Doe, they can avoid the liabilities associated with a legal entity. It is also a common practice to place the copyright symbol (©) next to the name and the surname. This allegedly protects against the use of this data by other individuals or institutions without the owner's consent<sup>13</sup>. Members of the movement also add the Latin *sui iuris* ([persons] of one's own right) after their name to signify individual autonomy and a refusal to recognise regulations imposed by state authorities.

Another widespread element of pseudo-legal beliefs is the conviction that the federal government opens a secret account for each person at birth in the national treasury, where the person's projected future earnings are secured. The movement's supporters are making attempts to reclaim access to these funds. To do so, for example, they file a form 1099-OID with false data with US authorities, which amounts to tax fraud. In 2016, the movement defrauded the government of approx. USD 43 million using this method<sup>14</sup>.

Another manipulation of the sovereign citizen movement is a theory related to maritime law. It derives from a misinterpretation of a 17<sup>th</sup> century British piece of legislation, the *Cestui Que Vie Act* of 1666<sup>15</sup>. This act allowed for a person lost at sea to be declared dead after seven years of disappearance, e.g. at sea, where finding person's body was impossible<sup>16</sup>. Supporters of the movement citing the document

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<sup>12</sup> On this theory, see in more detail: *Redemption Theory/Strawman Theory*, Anti-Defamation League, <https://extremismterms.adl.org/glossary/redemption-theorystrawman-theory> [accessed: 14 VII 2025].

<sup>13</sup> *The Sovereign Citizen Movement: Common Documentary Identifiers & Examples*, Anti-Defamation League, 5 XII 2016, <https://www.adl.org/resources/reports/the-sovereign-citizen-movement-common-documentary-identifiers-examples> [accessed: 25 X 2024].

<sup>14</sup> A. Powers, *How Sovereign Citizens Helped Swindle \$1 Billion From the Government They Disavow*, The New York Times, 29 III 2019, <https://www.nytimes.com/2019/03/29/business/sovereign-citizens-financial-crime.html> [accessed: 25 X 2024].

<sup>15</sup> Ch. Koppelman, *Construction as Resistance: Constructing a desired and envisioned future to perceived oppression for the sovereign citizen milieu in the Netherlands*, Utrecht University 2024, [https://student-theses.uu.nl/bitstream/handle/20.500.12932/47667/h.c.koppelman\\_6919642\\_thesis\\_CSHR.pdf?sequence=1&isAllowed=y](https://student-theses.uu.nl/bitstream/handle/20.500.12932/47667/h.c.koppelman_6919642_thesis_CSHR.pdf?sequence=1&isAllowed=y) [accessed: 1 VII 2025].

<sup>16</sup> Ch.M Sarteschi, *Sovereign Citizens and QAnon: The Increasing Overlaps with a Focus on Child Protective Service (CPS) Cases*, "International Journal of Coercion, Abuse & Manipulation" 2023, no. 6. DOI:10.54208/1000/0006/006.

claim that once a child reaches the age of seven, the government enslaves the individual, treating them as legally missing and taking control of their property. This belief is reflected in the language of the movement, where concepts related to maritime law are used to argue that any civil financial obligation is in fact the result of enslavement by state institutions<sup>17</sup>. In this respect, members of the movement also refer to the 13<sup>th</sup> century *Magna Carta*<sup>18</sup>.

Researchers also point to the racist aspects of the sovereign citizen movement. Some factions consider only white-skinned people to be sovereign citizens. The source of this view is an incorrect interpretation of the 14<sup>th</sup> Amendment to the US Constitution, which is that black Americans – according to this faction of the movement – have become the property of the federal government. This means that they do not have the rights of sovereign individuals, i.e. white citizens. In fact, this amendment is about giving rights and freedoms to all citizens of the United States, which was the reason for the abolition of slavery in this country. Southern Poverty Law Center organisation draws attention to the strong links between the sovereign citizen movement and extremist and racist organisations, for which anti-state rhetoric is a tool in the fight to preserve so-called racial purity and the superiority of the white race<sup>19</sup>.

The discourse of the sovereign citizen movement also exhibits features similar to the psychotic structures of meaning that Calum Lister Matheson discusses from the perspective of Jacques Lacan's psychoanalysis in his article *Psychotic Discourse: The Rhetoric of the Sovereign Citizen Movement*<sup>20</sup>. Matheson suggests that the idea of the movement centres around the rejection of the notion of law, which it replaces with a system of signs of an almost magical nature. In it, birth certificates or fictitious identities take on a literal meaning. The language used by the supporters of sovereign citizen movement builds an isolated order of meaning in which they find coherence and sense while rejecting the principles of the actual legal system. In Matheson's

<sup>17</sup> C. Kalinowski IV, *A Legal Response to the Sovereign Citizen Movement*, "Montana Law Review" 2019, vol. 80, no. 2, pp. 153–210, <https://scholarworks.umt.edu/mlr/vol80/iss2/2/> [accessed: 25 X 2024].

<sup>18</sup> *Magna Carta*, also known as *Magna Carta Libertatum* (The Great Charter), is a document issued and signed by King John of England on 15 June 1215. It constituted a form of agreement between the monarch and the barons and was simultaneously a privilege limiting royal power, particularly in financial matters (the introduction of taxes required the consent of the kingdom's council) and judicial matters (prohibition of imprisonment or punishment without a court verdict). The document also defined the rights of the barons and clergy, as well as the scope of freedoms for the lower social classes.

<sup>19</sup> *The Sovereigns: A Dictionary of the Peculiar...*

<sup>20</sup> C.L. Matheson, *Psychotic Discourse: The Rhetoric of the Sovereign Citizen Movement*, "Rhetoric Society Quarterly" 2018, vol. 2, no. 48, pp. 187–206.

view, an understanding of these psychotic structures and mechanisms can provide tools for criticism and respond to the rhetoric of a movement whose destabilising potential lies in both violating the law as well as creating social tensions.

## Movements in Poland inspired by the sovereign citizen movement

In Poland, anti-state organisations that are inspired by the US movement are mainly active online. There is a lack of academic literature about their activities, and state actions towards this community are not documented to the same extent as in the United States. The author presents the most active sovereign citizens in Poland and discusses their methods of operation.

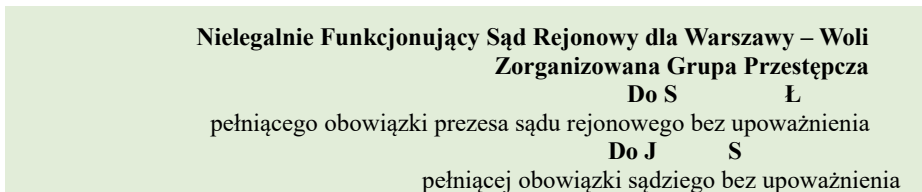
### Zawodowy Polak (Professional Pole)

One community of sovereign citizens is centred around Tadeusz Cichocki, and the communication channels of his supporters are the website [zawodowy-polak.pl](https://www.zawodowy-polak.pl) and the YouTube channels Zawodowy Polak and @katerina404. On 25 October 2018, after the local elections, Cichocki published online a *Decree of the Head of Authority* that other Polish sovereign citizens refer to in their documents<sup>21</sup>. Cichocki's supporters include him in a carbon copy when they send letters to various offices. The size of Zawodowy Polak movement is difficult to estimate due to its informal and decentralised nature. On 14 July 2025, there were 125 individual declarations of self-determination and responsibility published on [zawodowy-polak.pl](https://www.zawodowy-polak.pl), the last of which is dated 15 July 2024<sup>22</sup>. In October 2024, the YouTube channel Zawodowy Polak had 9470 subscribers. It is difficult to estimate how many of those watching identify with the movement and take an active part in it. The video of 2 July 2024 entitled *Najemnicy NFUMiG Konstancin Jeziorna* (English: Mercenaries of NFUMiG Konstancin Jeziorna), in which a supporter of the movement argues with a clerk of the Department of Spatial Planning of the City and Municipality of Konstancin-Jeziorna, features 25 comments, most of which are positive about

<sup>21</sup> T. Cichocki, *Dekret Zwiernchnika Władzy w Rzeczypospolitej Polskiej 1-2018* (Eng. Decree of the Head of Authority in the Republic of Poland 1-2018), Piaseczno, 25 X 2018, <https://www.tcichocki.pl/Dekret%20Zwiernchnika%20W%C5%82adzy%20w%20RP%201-2018%202018.10.25.pdf> [accessed: 25 X 2024].

<sup>22</sup> *Deklaracja Samostanowienia i Odpowiedzialności* (Eng. Declaration of self-determination and responsibility), Zawodowy Polak, [https://www.zawodowy-polak.pl/index.php?title=Deklaracja\\_Samostanowienia\\_i\\_Odpowiedzialno%C5%9Bci](https://www.zawodowy-polak.pl/index.php?title=Deklaracja_Samostanowienia_i_Odpowiedzialno%C5%9Bci) [accessed: 15 XII 2024].

the content of the video<sup>23</sup>. The acronym NFUMiG stands for Illegally Operating City and Municipal Authority. Supporters of Zawodowy Polak use abbreviations beginning with ‘NF’ (Illegally Operating) when dealing with public institutions, and when dealing with civil servants add: ‘pełniący obowiązki’ (‘acting’) – before the job title and ‘bez upoważnienia’ (‘without authority’) after the job title (Figure 1).



**Figure 1.** Example of addressing messages to public authorities by Zawodowy Polak movement.

Source: Letter of 28 V 2024 on brazen violations of constitutional rights, dignity, human and civil liberties (...) Ref. no. I Co 3161/2, Zawodowy Polak, [https://www.zawodowy-polak.pl/TB-NFSR-W-wa\\_Wola\\_28.05.2024.pdf](https://www.zawodowy-polak.pl/TB-NFSR-W-wa_Wola_28.05.2024.pdf) [accessed: 14 VII 2024]. Anonymisation was performed by the author of the article.

In the case of Zawodowy Polak movement, as with other sovereign citizen movements it is difficult to identify a systematised system of views and beliefs. Rather, one can observe a cluster of different, unrelated or contradictory views, beliefs and conspiracy theories. The website [zawodowy-polak.pl](https://www.zawodowy-polak.pl) includes longer documents and statements as well as short chaotic slogans. Supporters of the movement on the basis of, inter alia, art. 4 of the Constitution of the Republic of Poland refer to themselves as the Heads of Authority<sup>24</sup>, while posting on their website the Fourth Geneva Convention<sup>25</sup> with the reservations of the states that have adopted it. Elsewhere

<sup>23</sup> *Najemnicy NFUMiG Konstancin Jeziorna* (Eng. Mercenaries of NFUMiG Konstancin Jeziorna), YouTube channel Zawodowy Polak, 2 VII 2024, <https://www.youtube.com/watch?v=jeH8LX0eYfY> [accessed: 1 VII 2025]

<sup>24</sup> See e.g.: Akt oskarżenia z dnia 4 XI 2024 r. (Eng. Indictment act of 4 XI 2024), Zawodowy Polak, [https://www.zawodowy-polak.pl/KC-Akt\\_Oskarzenia-NFPR-4.11.2024.pdf](https://www.zawodowy-polak.pl/KC-Akt_Oskarzenia-NFPR-4.11.2024.pdf) [accessed: 14 VII 2025]; Pismo z dnia 7 III 2024 r. dotyczące braku uprawnień do pełnienia funkcji sędziego, dyrektora i prezesa – dyskryminacji (Eng. Letter of 7 III 2024 on the lack of qualifications to hold the position of discrimination judge, director and president), Zawodowy Polak, [https://www.zawodowy-polak.pl/KC-NFSR-Grojec\\_7.03.2024.pdf](https://www.zawodowy-polak.pl/KC-NFSR-Grojec_7.03.2024.pdf) [accessed: 14 VII 2025].

<sup>25</sup> *IV Konwencja Genewska* (Eng. IV Geneva Convention), Zawodowy Polak, [https://zawodowy-polak.pl/index.php?title=IV\\_Konwencja\\_Genewska](https://zawodowy-polak.pl/index.php?title=IV_Konwencja_Genewska) [accessed: 1 I 2025].

on the site, the movement's drafts and proposals on electoral law are published<sup>26</sup>. Also presented is the anti-religious content of Anne Marie Riezinger (aka Anne Von Reitz), self-proclaimed Alaska Superior Court Judge<sup>27</sup>. It seems, therefore, that the Polish faction of the sovereign citizen movement, apart from the translation and partial adaptation of the writings of the movement's US proponents, does not bring new, original concepts to the anti-state ideologies.

It is worth noting that Zawodowy Polak, like other representatives of the sovereign citizen movement, appeals to alternative interpretations of the law aimed at undermining state institutions, including the judiciary, administration and politics. The movement's supporters often ignore existing laws and legal norms, deeming them non-existent or illegal, which leads to ambiguous and difficult to predict actions at the legal and social level.

The publications and statements of representatives of Zawodowy Polak may appear complex, but they are based on simple but flawed assumptions about the nature of power, law and the state. They include disinformation and logical manipulation and as such may pose a threat to public order and social stability.

The similarity of Zawodowy Polak to sovereign citizen movement is mainly visible in the writings published on the website [zawodowy-polak.pl](http://zawodowy-polak.pl). They are exemplary for Polish sovereign citizens, who prepare their versions of these letters for offices and companies all over Poland. Elements borrowed from the US sovereign citizen movement used by Zawodowy Polak are shown in Figure 2. These are:

- 1) distinction between a legal person and a natural person (of flesh and blood) – a red signature in the graphic,
- 2) characteristic way of writing the name, i.e. a hyphen between given names, the addition of 'son of' and 'of the family' before the surname, as well as a copyright mark,
- 3) seal with an eagle stylised as an official seal.

<sup>26</sup> *Prawo wyborcze* (Eng. Electoral law), Zawodowy Polak, [https://zawodowy-polak.pl/index.php?title=Prawo\\_wyborcze](https://zawodowy-polak.pl/index.php?title=Prawo_wyborcze) [accessed: 1 I 2025].

<sup>27</sup> B.J. Kelley, *Interview with a sovereign: Judge Anna's World*, Southern Poverty Law Center, 15 XII 2017, <https://www.splcenter.org/hatewatch/2017/12/15/interview-sovereign-judge-anna%E2%80%99s-world> [accessed: 1 I 2025]; *Report and Recommendation*, Case No. 1:16-cv-614, [https://www.gov-info.gov/content/pkg/USCOURTS-ohsd-1\\_16-cv-00614/pdf/USCOURTS-ohsd-1\\_16-cv-00614-0.pdf](https://www.gov-info.gov/content/pkg/USCOURTS-ohsd-1_16-cv-00614/pdf/USCOURTS-ohsd-1_16-cv-00614-0.pdf) [accessed: 1 I 2025]; *Religia* (Eng. Religion), Zawodowy Polak, <https://zawodowy-polak.pl/index.php?title=Religia> [accessed: 9 VII 2025].



**Figure 2.** Example of signature used by Zawodowy Polak movement. Anonymisation was performed by the author of the article.

Source: Pismo z dnia 8 V 2024 r. dotyczące bezczelnego łamania konstytucyjnych praw, godności, wolności człowieka i obywatela (...) (Eng. Letter of 8 V 2024 on brazen violations of constitutional rights, dignity, human and civil liberties) Ref. no.: 4161-0.Ds 783.24, Zawodowy Polak, [https://www.zawodowy-polak.pl/KC-NFPR-Lukow\\_8.05.2024.pdf](https://www.zawodowy-polak.pl/KC-NFPR-Lukow_8.05.2024.pdf) [accessed: 14 VII 2024]. Anonymisation was performed by the author of the article.

It is worth noting that the founder of Zawodowy Polak movement signs published documents using black font, without a handwritten signature, copyright mark, hyphen between given names or the phrase ‘of the family’ before the surname<sup>28</sup>. This means that the methods used by individuals who identify with the movement can be created independently and on *ad hoc* basis, according to each person’s ideas. As a result, the ideology and beliefs of the movement are inconsistent, often illogical, and even internally contradictory.

Supporters of Zawodowy Polak movement indicate penalties for taking certain actions against them (see Figure 3). This is aimed at public officials (mainly police officers), who are authorised to carry out such actions under the law, such as: the *Act of 24 May 2013 on direct coercive measures and firearms* and the *Act of 6 April 1990 on the Police*.

<sup>28</sup> T. Cichocki, *Polki i Polacy – już czas wypowiedzieć posłuszeństwo nielegalnej władzy działającej na naszą szkodę!!! List otwarty* (Eng. Polish women and men – it is time to declare disobedience to the illegitimate authorities acting to our detriment!!! An open letter), [https://www.tcichocki.pl/20150402\\_Wypowiedzenie\\_posluszenstwa\\_organom\\_panstwa.pdf](https://www.tcichocki.pl/20150402_Wypowiedzenie_posluszenstwa_organom_panstwa.pdf) [accessed: 2 IV 2025].

**Ponadto informuję że:**

- Wykorzystanie danych osobowych przez firmy, instytucje i osoby fizyczne wymaga pisemnej zgody kreatorów i właściciela.
- Kara za wykorzystanie danych osobowych bez wykazanej zgody lub uprawnień wynosi 1500000 € za jednorazowe kopiowanie i przetwarzanie.
- Kara za podstępne wydobycie podpisu 5000000 €.
- Kara za dzień pozbawienia mnie wolności wynosi 8000000 €.
- Kara za ignorowanie woli zwierzchnika władzy oraz łamanie praw człowieka wynosi 10000000 €.

Jestem w wieku trzydziestu jeden lat i przy zdrowych zmysłach, tekst powyższy przeczytałem oraz poświadczam że jest zgodny z prawdą i moją wolną wolą... i sygnuję własnoręcznym podpisem.

**Figure 3.** Excerpt from a document of Zawodowy Polak movement.

Source: D. Bryda, *Deklaracja Samostanowienia i Odpowiedzialności* (Eng. Declaration of self-determination and responsibility), 12 I 2024, [https://www.zawodowy-polak.pl/DB-Deklaracja\\_12.01.2024r.pdf](https://www.zawodowy-polak.pl/DB-Deklaracja_12.01.2024r.pdf) [accessed: 25 X 2024].

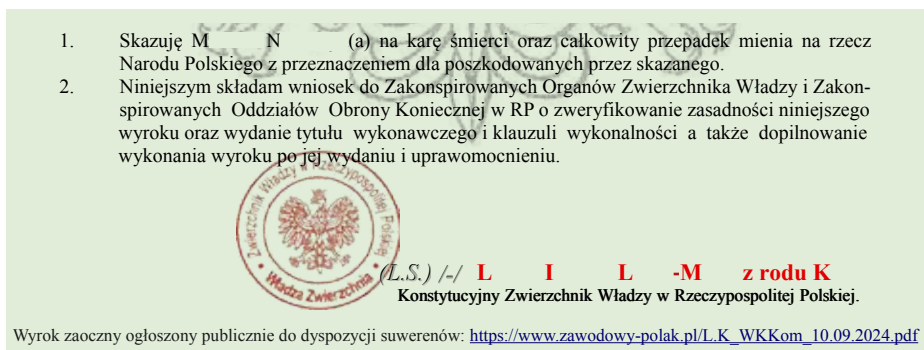
On the YouTube channel Zawodowy Polak, content is published presenting conspiracy theories important to the sovereign citizen movement, as well as videos documenting visits by movement supporters to public offices, such as the Social Insurance Institution (ZUS), municipal offices or local election commissions<sup>29</sup>. Confrontations with traffic police patrols are also shown, usually ending with an intervention against a supporter of the movement who disrupts the work of officers or resulting in detention or the issuing of a fine. Police interventions have often been the subject of so-called commentary videos, in which the creator responds to another video. In one case, a police officer commented on an intervention on his private channel<sup>30</sup>. He drew attention, among other things, to the characteristic language (the supporter of the movement claimed that he was not a driver but a human being). Due to the professionalism of the police officers conducting the intervention and the behaviour of the person subjected to it, the police work is commented on positively, while the behaviour of the detained person is commented on negatively or humorously. Members of the movement claim that they act on behalf of the sovereign, meaning the Polish nation, and justify their actions with legal arguments that have no basis in the applicable law. They refer to natural law, question the legality of state authorities and undermine their authority and

<sup>29</sup> *Nie można nagrywać najemników i lokalu wyborczego w Kisielsku?* (Eng. Can't the mercenaries and the polling station in Kisielsk be recorded?), YouTube channel Zawodowy Polak, 9 VI 2024, <https://www.youtube.com/watch?v=8nAon2vpOTQ> [accessed: 15 XII 2024].

<sup>30</sup> „Nielegalne” zatrzymanie przez Policję i ZAWODOWY POLAK | Bagieta rozkłada interwencje #3 (Eng. 'Illegal' Police detention and ZAWODOWY POLAK | Bagieta breaks down interventions #3), YouTube channel Sierżant Bagieta, 26 II 2020, [https://www.youtube.com/watch?v=EgQWjQEDq\\_A](https://www.youtube.com/watch?v=EgQWjQEDq_A) [accessed: 1 I 2025].

competences. In practice, their activities lead to disruptions in the work of public offices and the Police.

Most of the recorded behaviour of the movement's supporters can be considered harmless vexatious litigation, but there is also a content of a different nature, for instance, a video titled *When should you shoot a cop?*<sup>31</sup>. The radicalisation of the movement is also visible on the main website: [zawodowy-polak.pl](http://zawodowy-polak.pl), where supporters are called upon to create (sic!) Clandestine Tribunals of the Polish Nation, which are supposed to issue in absentia death sentences on (...) *the enemies of the Republic of Poland and their collaborators, in accordance with natural law, the Polish national interest and their own conscience*<sup>32</sup>. The authors of this appeal are therefore calling for vigilante justice against state officials and representatives of the authorities. In response, from 2024 onwards, sympathisers of the movement have begun posting death sentences for the enemies of individual members on the [zawodowy-polak.pl](http://zawodowy-polak.pl) website. The execution of these sentences is assigned to the aforementioned tribunals (Figure 4). For instance, an indictment against a court bailiff has been published, containing a criminal threat (i.e. the threat of imposing and carrying out the death penalty)<sup>33</sup>.



**Figure 4.** The wording of a sentence issued by a member of Zawodowy Polak movement. Anonymisation was performed by the author of the article.

Source: *Wyrok zaoczny w imieniu Zwierzchnika Władzy w Rzeczypospolitej Polskiej* (Eng. A sentence passed in absentia on behalf of the Head of Authority in the Republic of Poland), Zawodowy Polak, 10 IX 2024, [https://www.zawodowy-polak.pl/L.K\\_WKKom\\_10.09.2024.pdf](https://www.zawodowy-polak.pl/L.K_WKKom_10.09.2024.pdf) [accessed: 25 X 2024]. Anonymisation was performed by the author of the article.

<sup>31</sup> *Kiedy powinienes zastrzelić agenta?* (Eng. When should you shoot a cop?), YouTube channel Moron3k, [https://youtu.be/AJ2HJWhmrde?si=kbENyPyZmWGeG2\\_C](https://youtu.be/AJ2HJWhmrde?si=kbENyPyZmWGeG2_C) [accessed: 14 VII 2025].

<sup>32</sup> T. Cichocki, *Polki i Polacy – już czas...*, p. 10.

<sup>33</sup> T. Berkowska, *Akt oskarżenia* (Eng. Indictment act), [https://www.zawodowy-polak.pl/TB\\_NFKS-MK-Akt\\_Oskarzenia-27.11.2024.pdf](https://www.zawodowy-polak.pl/TB_NFKS-MK-Akt_Oskarzenia-27.11.2024.pdf), p. 3 [accessed: 1 I 2025].

Both Polish and US sovereign citizens are characterised by xenophobic views. In the United States, these are mainly racist views, while in Poland antisemitism predominates. On the *zawodowy-polak.pl* website, one can find an example of an antisemitic text titled: *Protokoły Mędrców Syjonu* (The Protocols of the Sages of Zion)<sup>34</sup>.

### Ruch II RP (The Second Polish Republic movement)

The founder of the Ruch II RP movement is claiming to be a count and the president of the Second Polish Republic in exile Jan Zbigniew Potocki. According to Potocki, the last legitimate president of the Second Polish Republic's government in exile was Juliusz Nowina-Sokolnicki, not Ryszard Kaczorowski, and it is from him that he derives his mandate to continue holding the office of President of the Second Polish Republic. Although Nowina-Sokolnicki was appointed by August Zaleski, he was a controversial figure, and his appointment raised doubts, partly because it was never officially announced in the appropriate official publications. Zaleski repeatedly changed his successors, that led to the parallel existence of various centres of power in exile. One of these was the Sokolnicki line, while the other recognised Kaczorowski as the legitimate president. On 22 September 1971, Zaleski appointed Sokolnicki, as his successor, which meant the dismissal of Stanisław Ostrowski. However, after Zaleski's death, it was Ostrowski who was recognised as a president by main political centres of the émigré community. Despite this, Sokolnicki maintained that his appointment was valid. This led to a situation of dual power within the émigré circles<sup>35</sup>. The activities of Jan Zbigniew Potocki, which refer to Nowina-Sokolnicki presidency, are therefore a continuation of the divisions that originated in the 1970s. Like Sokolnicki, Potocki appeals to the legal continuity of the Second Polish Republic and seeks to legitimise his actions by invoking the historical controversies surrounding the presidential succession in exile.

One of the main activities of Potocki is the sale of so-called identity cards of the sovereign of the Second Polish Republic (Figures 5 and 6).

<sup>34</sup> *Protokoły Mędrców Syjonu* (Eng. The protocols of the Sages of Zion), Zawodowy Polak, [https://zawodowy-polak.pl/index.php?title=Protoko%C5%82y\\_M%C4%99drc%C3%B3w\\_Syjonu](https://zawodowy-polak.pl/index.php?title=Protoko%C5%82y_M%C4%99drc%C3%B3w_Syjonu) [accessed: 1 VII 2025].

<sup>35</sup> J. Majchrowski, *Kwestia sukcesji prezydenckiej na obczyźnie* (Eng. The question of presidential succession in exile), in: *Mysł polityczna: od historii do współczesności*, B. Stoczewska, M. Jaskólski (eds.), Kraków 2000, p. 258, <https://ruj.uj.edu.pl/server/api/core/bitstreams/2cc6a415-0de3-4172-bbd2-2cd16fce2235/content> [accessed: 1 I 2025].



**Figure 5.** Front of the identity card of the sovereign of the Second Polish Republic.

Source: K. Jesionowska, *Dowód osobisty suwerena II Rzeczypospolitej Polskiej* (Eng. ID of the sovereign of the Second Polish Republic), *Straż Graniczna*, 3 XII 2021, <https://www.slaski.strazgraniczna.pl/sml/aktualnosci/43765,Dowod-osobisty-suwerena-II-Rzeczypospolitej-Polskiej.html> [accessed: 25 X 2024].



**Figure 6.** Back of the identity card of the sovereign of the Second Polish Republic.

Source: K. Jesionowska, *Dowód osobisty suwerena II Rzeczypospolitej Polskiej* (Eng. ID of the sovereign of the Second Polish Republic), *Straż Graniczna*, 3 XII 2021, <https://www.slaski.strazgraniczna.pl/sml/aktualnosci/43765,Dowod-osobisty-suwerena-II-Rzeczypospolitej-Polskiej.html> [accessed: 25 X 2024].

Although these documents are not recognised by state institutions and are not listed in international databases (e.g. PRADO), Potocki claims that possessing a sovereign ID comes with various privileges, such as exemption from the obligation to vaccinate children, exemption from military draft (currently military qualification), immunity from enforcement by court bailiffs and exemption from Polish tax law. It is worth noting the similarity in this regard

to the German Reichsbürger (Reich Citizens) movement, which also uses documents referring to a state that no longer exists rather than its current constitutional form<sup>36</sup>. Potocki is also planning to issue birth certificates, driving licences and passports.

The letters, that Potocki advises his supporters to send to public offices are similar to those used by Zawodowy Polak movement. Both movements claim that, as flesh and blood individuals, they are not subject to the law. They use red font for selected parts of their letters and maintain that Poland is not a state but a company registered in the United States Securities and Exchange Commission as: POLAND REPUBLIC OF<sup>37</sup>. In reality, the entry of the Republic of Poland into the register of the US Securities and Exchange Commission serves to facilitate the sale of bonds on international markets and does not have any legal or international consequences for the status of the RP, it does not give Poland the status of a company<sup>38</sup>.

In 2024, the activities of Ruch II RP movement quieted down for a time due to internal disputes and Potocki's imprisonment. In 2025, his supporters reactivated the movement<sup>39</sup>.

### **Demokracja i Sprawiedliwość (Democracy and Justice) and the National Tribunal**

Demokracja i Sprawiedliwość (English: Democracy and Justice) is an association based in Jelenia Góra, led by Grzegorz Niedźwiedzki. It has formed an eight-member

<sup>36</sup> J. Eichner, „Reichsdeutsche” fordern bayerische Justiz heraus. Hier ist „deutsches Reichsgebiet”, Bayerischer Rundfunk, 23 IV 2016, <https://www.br.de/nachricht/reichsbuerger-bayern-gerichtsvollzieher-100.html> [accessed: 25 X 2024].

<sup>37</sup> This issue was even a subject of a parliamentary interpellation by the MP Jarosław Sachajko in 2020. See: *Interpelacja nr 5712 w sprawie zarejestrowania firmy POLAND REPUBLIC OF w rejestrze Amerykańskiej Komisji Papierów Wartościowych* (Eng. Interpellation no. 5712 concerning registration of POLAND REPUBLIC OF in the register of the US Securities Exchange Commission), Sejm RP, <https://www.sejm.gov.pl/sejm9.nsf/interpelacja.xsp?typ=INT&nr=5712> [accessed: 1 VII 2025].

<sup>38</sup> Ł. Starzewski, *Polska zarejestrowana jako firma w USA? RPO prosi MSZ o zbadanie skargi obywatela* (Eng. Poland registered as a company in the USA? The Ombudsman asks the Ministry of Foreign Affairs to investigate citizen's complaint), Rzecznik Praw Obywatelskich, 24 II 2020, <https://www.rpo.gov.pl/pl/content/polska-zarejestrowana-jako-firma-w-usa-rpo-prosi-msz-o-zbadanie-skargi-obywatela> [accessed: 25 X 2024].

<sup>39</sup> W. Ferfecki, *Jan Zbigniew Potocki kontra współpracownicy. Bunt przeciw samozwańczemu prezydentowi* (Eng. Jan Zbigniew Potocki vs. colleagues. Rebellion against the self-appointed president), Rzeczpospolita, 17 V 2024, <https://www.rp.pl/polityka/art40374471-jan-zbigniew-potocki-kontra-wspolpracownicy-bunt-przeciw-samozwanczemu-prezydentowi> [accessed: 25 X 2024].

Supreme National Tribunal<sup>40</sup>, which acts as a people's court. To lend the credibility, the members of this tribunal wear judge's robes of their own design (a black robe with a white and red jabot, but unlike the official robes used by the Constitutional Tribunal, the jabot has a horizontal pattern rather than a vertical one – see Photo 1). One member of the movement, who calls himself the President of Free Poland, also wears a Polish Army uniform with additional insignia of the Polish Riflemen's Units. He exploits a legal loophole to build his image on the authority of the military.



**Photo 1.** The session of the Supreme National Tribunal.

Source: *Uchwała Najwyższego Trybunału Narodowego o nieważności wyroków w imieniu Rzeczypospolitej Polskiej* (Eng. Resolution of the Supreme National Tribunal on the invalidity of judgments in the name of the Republic of Poland), trybunał-narodowy.pl, 13 XI 2024, <https://www.trybunał-narodowy.pl/uchwała-najwyższego-trybunału-narodowego-o-nieważności-wyroków-w-imieniu-rzeczypospolitej-polskiej/> [accessed: 1 VII 2025]. Anonymisation was performed by the author of the article.

In 2021, the Supreme National Tribunal sentenced 24 public officials (including Zbigniew Ziobro, who was the then Prosecutor General and once as the Minister of Justice) to 15 years of imprisonment with an obligation to perform community service, infamy, social ostracism, loss of the right to a pension related to their profession, deprivation of civil rights, payment of PLN 100 000 in compensation to the victim, payment of PLN 1 million in compensatory damages to Demokracja

<sup>40</sup> *Najwyższy Trybunał Narodowy. Akt ustanowienia* (Eng. The Supreme National Tribunal. Act of Establishment), Demokracja i Sprawiedliwość, <https://demokracjaisprawiedliwosc.pl/najwyższy-trybunał-narodowy/> [accessed: 21 VII 2025].

i Sprawiedliwość association, and ordered them to issue a public apology to the victim, who was identified as Grzegorz Niedźwiedzki.

On 3 May 2024, Demokracja i Sprawiedliwość association established the Government of Free Poland and issued commemorative certificates of appointment and membership IDs to its members<sup>41</sup>. The video of the formation of this government<sup>42</sup> on 1 January 2025 had approx. 2000 views, and the YouTube channel – 735 subscribers. Each video published by the association averages approx. 800 views.

Another organisational unit is the National Tribunal, which is based in Jelenia Góra and is personally connected with Demokracja i Sprawiedliwość association. According to the National Court Register (KRS) extract published on its website trybunal-narodowy.pl, it is a union of associations. In its decisions, the National Tribunal refers, among others, to the puppet theory, claiming that the state cannot judge a human being, only legal entities into which people have allegedly been transformed. Tribunal also distributes *Declaration of Self-determination and Responsibility* of Zawodowy Polak movement.

### The movement of Teresa Garland

The movement led by Teresa Garland, who calls herself the President of the Electoral Republic of Poland, is partially similar to sovereign citizen movement. She legitimises her title with the result of an election that she organised and conducted herself, in which she asked her supporters to transfer 1 PLN to her bank account with the transfer title: vote. She decided to do this because she was unable to gather 1000 signatures required to register an electoral committee with the National Electoral Commission<sup>43</sup>. Garland also established Provisional Council of State of the Polish Nation Social Constitutional Committee, whose one member is Piotr Smolana, a former MP of Samoobrona party<sup>44</sup>. Teresa Garland's activity mainly

<sup>41</sup> *Powołano Rząd Wolnej Polski* (Eng. The Government of Free Poland was established), Demokracja i Sprawiedliwość, <https://demokracjaisprawiedliwosc.pl/powolano-rzad-wolnej-polski/> [accessed: 1 VII 2025].

<sup>42</sup> *Powołanie Rządu Wolnej Polski* (Eng. Establishment of the Government of Free Poland), YouTube channel Trybunał Narodowy, <https://www.youtube.com/watch?v=1HyXzBXXfOs&t=1s> [accessed: 1 VII 2025].

<sup>43</sup> T. Garland, 24 III 2020 r. PKW TERESA GARLAND zgłoszenie kandydatury po raz trzeci (Eng. 24 III 2020 PKW TERESA GARLAND application for the third time), Teresa Garland, <https://teresagarlandprezydent.wordpress.com/2020/03/24/24-iii-2020r-pkw-teresa-garland-zgloszenie-kandydatury-po-raz-trzeci/> [accessed: 1 I 2025].

<sup>44</sup> R. Gębuś, *Samozwańczy Rząd Tymczasowej Rady Stanu apeluje o poparcie do łęborskiej rady. Burmistrz powiadamia prokuraturę* (Eng. Self-appointed Government of the Provisional Council of State appeals for support to Łębork council. The mayor notifies the public pros-

involves sending petitions to municipal and city offices across Poland concerning, among others, the establishment of a local energy guard, the announcement of people's referendum<sup>45</sup>, support for her provisional government and the arming of every indigenous inhabitant of Poland<sup>46</sup>. In 2022, Garland was detained by the Police<sup>47</sup>, and the District Court in Wieliczka ordered her to undergo psychiatric evaluation<sup>48</sup>. It is worth noting that as the conflict between Garland and the Polish state intensified, she began to use more and more phrases and demands characteristic of the sovereign citizen movement, such as: citizen-sovereign, flesh and blood person and challenging the legality of the court as a state institution. Based on the number of subscribers to the YouTube channel @prezydentelektorski channel, as of 1 January 2025 the popularity of the movement of Teresa Garland can be estimated at approx. 660 people. The latest video from April 2024 has approx. 30 views. Teresa Garland communicates with her supporters through a blog and profiles on platforms like vk.com (the video from December 2024 as of 1 January 2025 has 16 views) or gloria.tv.

#### Other representatives of sovereign citizen movement in Poland

In Poland, there are also other individuals and groups that form alternative state authorities. They refer to monarchist movements and create their own alt-state documents. The author omitted their activities in this article due to their lesser popularity and lack of clear connections to the sovereign citizen

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ecutor's office), Łębork Nasze Miasto, 19 IV 2021, <https://leborg.naszemiasto.pl/samozw-anczy-rzad-tymczasowej-rady-stanu-apeluje-o-poparcie/ar/c15-8238215> [accessed: 1 I 2025].

<sup>45</sup> *Samozwańcza prezydent synpęła petycjami* (Eng. Self-appointed president filed petitions), Super Tydzień Chełmski, 15 IV 2021, <https://www.supertydzien.pl/artukul/10406,samozwancza-prezydent-sypnela-petycjami> [accessed: 1 I 2025].

<sup>46</sup> J. Sidorowicz, *Broń od gminy dla każdego rdzennego mieszkańca Starego Sącza? Jest petycja w sprawie programu „Broń palna plus”* (Eng. Arms from the municipality for every native of Stary Sącz? There is a petition on the 'Firearms plus' programme), Kraków.Wyborcza.pl, 26 IX 2022, <https://krakow.wyborcza.pl/krakow/7,44425,28955388,bron-od-gminy-dla-kazdego-rdzennego-mieszkanca-star-ego-sacza.html> [accessed: 1 I 2025].

<sup>47</sup> *Ośrodek Monitorowania Zachowań Rasistowskich i Ksenofobicznych, Teresa Garland będąca proro-syjską patoccelebrytką w końcu zatrzymana przez policję* (Eng. Teresa Garland pro- Russian scandal-ous celebrity finally detained by the Police), Facebook, 28 IX 2022, <https://www.facebook.com/os-rodek.monitorowania/posts/teresa-garland-b%C4%99d%C4%85ca-prorosyjsk%C4%85-patocceleb-rytk%C4%85-w-ko%C5%84cu-zatrzymana-przez-policj/1917138658461258/> [accessed: 1 I 2025].

<sup>48</sup> T. Garland, *Sprzeciw i apelacja na wyrok z dnia 12 X 2023r. o sygn. akt IIK 451/21 w Sądzie Rejono-wym w Wieliczce* (Eng. Objection and appeal against the judgment of 12 X 2023 ref. no. IIK 451/21 in the District Court in Wieliczka), Tymczasowa Rada Stanu, <https://tymczasowaradastanu.wordpress.com/2023/11/24/teresa-garland-sprzeciw-i-apelacja-na-wyrok-z-dnia-12-x-2023r-o-sygn-akt-iik-451-21-w-sadzie-rejonowym-w-wieliczce/> [accessed: 1 I 2025].

movement. However, their activity is worth monitoring because of the potential increase in their significance within the sovereign citizen environment, caused, for instance, by the cessation or suspension of activities by more popular movements.

### Implications for the financial sector (particularly banking)

Individuals identifying with Zawodowy Polak movement deny the existence and legitimacy not only of government institutions, including the Police and local governments, but also private companies in the banking sector and financial institutions. An example of such actions are letters published on Zawodowy Polak movement platform and addressed to the Insurance Guarantee Fund (UFG) as well as to Santander Bank Polska S.A. In a letter to Santander Bank<sup>49</sup> (described by the movement's supporters as Illegally Operating SANTANDER BANK POLSKA S.A., NFSBP S.A.), Beata Koźlik denies the bank's right to demand repayment of the loan she took out and to transfer it for collection by an external entity. She also accuses the bank of using so-called abusive clauses. As evidence for this last point, she presents the lack of responses from the branch director and the bank's president, the lack of replies from the bank's team manager and the customer ombudsman, as well as deliberate misleading and manipulation by having two different bank representatives answer her letters alternately – people who were not the exact addressees of her correspondence, as well as (...) *lack of indisputable, documented evidence of legal authority*<sup>50</sup>. The methods used by the movement against private entities are therefore similar to these used against state institutions. Since the banking sector is a part of the country's critical infrastructure<sup>51</sup>, such actions are harmful not only from the perspective of the bank as a private institution but also from the perspective of the state.

In turn, in the letter to the Insurance Guarantee Fund (UFG) Arkadiusz Bosa challenges the legality of the UFG and questions the legal status of the Fund's

<sup>49</sup> B. Koźlik, *Doręczenie odpisu postanowienia zwierzchnika władzy w Rzeczypospolitej Polskiej* (Eng. Delivery of a copy of the order of the head of authority in the Republic of Poland), Zawodowy Polak, 27 VI 2022, [https://zawodowy-polak.pl/BK-ost\\_postanowienie\\_bank\\_27.06.2022.pdf](https://zawodowy-polak.pl/BK-ost_postanowienie_bank_27.06.2022.pdf) [accessed: 1 I 2025].

<sup>50</sup> Ibid.

<sup>51</sup> K. Piękoś, *Ataki cybernetyczne na systemy bankowe oraz infrastrukturę krytyczną – analiza wybranych przypadków* (Eng. Cyberattacks on banking systems and critical infrastructure – analysis of selected cases), "Krakowskie Studia Małopolskie" 2017, no. 22, pp. 106–113.

representatives. The sender of the letter accuses the UFG of acting to the detriment of the state and citizens, referring to the absence of documented social mandates and compliance with the constitution. He demands proof of the legal authority of the UFG's representatives and calls for an immediate end to any illegal activities under threat of legal consequences<sup>52</sup>.

Videos can also be found on YouTube showing Teresa Garland's disrupting a conference attended by the President of the National Bank of Poland (NBP) Adam Glapiński, and then approaching him at a dangerous distance<sup>53</sup>. In the context of past attacks on representatives of the financial sector<sup>54</sup> and central banking<sup>55</sup>, it is worth to emphasise that allowing members of anti-state movements, who are extremely critical of any form of state monetary policy, to get so close is irresponsible and represents a serious lapse in the security measures protecting the President of NBP. A potential attack on the person holding such a position poses a threat to the stability of monetary policy<sup>56</sup>. It is worth noting that according to the *Act of 8 December 2017 on the State Protection Service*, the President of the NBP is not an entity listed in the Act *per se*, however, he could be protected by the State Protection Service (SOP) on the basis of the Prime Minister's decision.

Due to US sources of the movement, it is worth paying attention to the solutions adopted there and the methods of dealing with supporters of the sovereign citizen movement<sup>57</sup>. This could serve as a point of reference for

<sup>52</sup> A. Bosa, *Decyzja Zwiernika Władzy w Rzeczypospolitej Polskiej od której nie przysługuje zażalenie* (Eng. Decision of the Head of Authority in the Republic of Poland against which there is no right of appeal), 13 VIII 2023, [https://www.zawodowy-polak.pl/AB-NFUFUG\\_13.08.2023.pdf](https://www.zawodowy-polak.pl/AB-NFUFUG_13.08.2023.pdf) [accessed: 1 I 2025].

<sup>53</sup> *Prezes NBP Glapiński, Teresa Garland i demokracja* (Eng. President of the NBP Glapiński, Teresa Garland and democracy), YouTube channel Fides Polska TV, 16 XI 2018, <https://www.youtube.com/watch?v=j1Bd4ZToToE> [accessed: 1 I 2025].

<sup>54</sup> J. Bielecki, *Amerykanie mają dość ubezpieczycieli* (Eng. Americans are fed up with insurers), *Rzeczpospolita*, 11 XII 2024, <https://www.rp.pl/przestepczosc/art41568761-amerykanie-maja-dosc-ubezpieczycieli> [accessed: 1 VII 2025].

<sup>55</sup> *Top Russian central banker shot to death*, NBC News, 14 IX 2006, <https://www.nbcnews.com/id/wbna14826889> [accessed: 1 VII 2025].

<sup>56</sup> P. Król, *Analiza zamachów na osoby publiczne – skuteczność działań prewencyjnych służb bezpieczeństwa i konsekwencje polityczno-społeczne* (Eng. Analysis of assassinations on public figures – effectiveness of preventive actions by security forces and political and social consequences), "Kwartalnik Kadry Kierowniczej Policji" 2024, no. 3, <https://kwartalnik.akademiapolicji.edu.pl/images/stories/2024/3/krl.pdf> [accessed: 1 VII 2025].

<sup>57</sup> D. Spungen, *How Financial Institutions Should Handle "Sovereign Citizens"*, Amundsen Davis, 18 III 2024, <https://www.amundsendavislaw.com/banking-brief-financial-services-insights/how-financial-institutions-should-handle-sovereign-citizens> [accessed: 1 I 2025].

Polish public institutions and the banking sector. In the United States, financial institutions and courts have adopted a firm policy towards attempts to repay debts using so-called fake financial instruments, such as fictitious bonds or emission coupons. These are deemed invalid and are not enforceable. US courts have repeatedly pointed out the lack of merit in the arguments presented by members of the movement. They have described them as legally unfounded, which has resulted in their immediate dismissal without the need for further proceedings. Banking institutions in the United States are instructed on how to proceed when a client attempts to use practices such as referring to a non-existing account in the United States Department of the Treasury, invoking irrelevant Uniform Commercial Code regulations or demanding the anonymisation of their data, including their social security number. In such cases, banks are encouraged to reject such requests in writing and to inform clients of their obligations under applicable agreements. In some cases, they may also consider closing the client's account if permitted by law and contractual terms. American experience shows that a key element in combating the sovereign citizen movement is the educating employees of financial and administrative institutions on how to recognise the characteristics typical of sovereign citizens.

One of the factors that contributed to such a policy was, among others, the case of a private currency produced by Bernard von NotHaus called Liberty Dollar (ALD). It consisted of both coins and banknotes in the form of certificates (Figure 8). The value of the Liberty Dollars corresponded to a specific amount of gold and silver for which it could be exchanged<sup>58</sup>. These actions caused concern within the Federal Reserve System (FED) and the United States Mint, which began to view this move as a threat to the stability of the US monetary and financial system.

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<sup>58</sup> L.H. White, *The Troubling Suppression of Competition from Alternative Monies: The Cases of the Liberty Dollar and E-gold*, "The Cato Journal" 2014, vol. 34, no. 2, pp. 281–301. <http://dx.doi.org/10.2139/ssrn.2406983>.



**Figure 8.** Exemplary Liberty Dollar banknote – front and back.

Source: Silver Certificates, NORFED Liberty Dollar, <https://norfed.info/silver-certificates/> [accessed: 1 I 2025].

A long-standing dispute, in which the organisation issuing Liberty Dollars presented various arguments, including those related to the purely numismatic nature of ALD, ended with the indictment and arrest of Bernard von NotHaus and three other people. In March 2011, NotHaus was convicted for producing, possessing and selling his own coins. He faced up to 15 years in prison and a fine of USD 250 000. Additionally, the government was able to seize assets in the form of coins and precious metals worth USD 7 million<sup>59</sup>. Ultimately, he was sentenced to six months of house arrest with a three-year probation period. At the probation officer's request, he was released from probation after one year.

Federal authorities described the activities of organisation issuing Liberty Dollars as an attempt to undermine the official US currency and compared it to a form of domestic terrorism that could harm the country's economic stability.

<sup>59</sup> P.C. Mullan, *The Liberty Dollar and Bernard von NotHaus*, in: *A History of Digital Currency in the United States. New Technology in an Unregulated Market*, New York 2016, pp. 87–109. [http://dx.doi.org/10.1057/978-1-137-56870-0\\_3](http://dx.doi.org/10.1057/978-1-137-56870-0_3).

Although historically the free banking system (i.e. without a central bank monopoly on currency issuance) was characterised by stability, today it is not seen as a solution to the problems of the financial market, since central banking is now an integral part of the state's economic policy, particularly its stabilisation function<sup>60</sup>.

The US authorities' opposition to attempts to undermine the authority of the state and financial institutions can serve as an inspiration for adopting a similar stance in Poland. This approach makes it possible to limit the influence of anti-state movements and minimise the threats they may pose to the country's financial stability.

## Summary and recommendations

The author discussed the development, activities as well as social and legal consequences of anti-state movements in Poland, whose ideology and methods are inspired by the US sovereign citizen movement.

Contact between representatives of state institutions and members of the movement is difficult due to their use of a specific pseudo-legal system, in which basic legal and administrative definitions are distorted and legal norms are applied selectively and instrumentally. For instance, a member of the movement denies the authority of the Police granted by the Police Act or the legitimacy of municipal authorities, citing the *Act of 8 March 1990 on municipal self-government*, only to later invoke the General Data Protection Regulation<sup>61</sup> as a basis to demand million-dollar compensations from police officers conducting interventions. The members of the movement also challenge the legality of decisions made by state authorities and refuse to recognise official documents, fines or court summons. They file baseless complaints and appeals, using formal procedures as tools to destabilise public institutions and overload the administrative system. They also attempt to establish quasi-governmental structures, such as national tribunals or citizens' courts, which issue legally ineffective rulings. These initiatives lead to conflicts with public officials, often resulting in verbal aggression and, in extreme cases, threats or attempts at intimidation by sovereign citizens.

<sup>60</sup> P. Marszałek, *Rynek czy państwo w bankowości – bankowość centralna versus bankowość wolna* (Eng. Market or government in banking – central banking vs. free banking), "Ryzyko i Zrównoważony Rozwój" 2011, no. 70, pp. 125–136.

<sup>61</sup> *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).*

An analysis of so-called pseudo-legal techniques used by supporters of sovereignty movements in both the USA and Poland showed that these should be treated as attempts to intimidate representatives of state institutions. Zawodowy Polak movement even went as far as publishing death sentences for ‘traitors of the nation’. Such actions, along with others, like promoting conspiracy theories and encouraging avoidance of legal responsibility, serve to radicalise members of the sovereign citizen movement in Poland<sup>62</sup>.

The sovereign citizen movement in Poland adapts US patterns, adjusting them to local realities and the specific characteristics of the Polish legal system, for instance, the use of seals, signatures in red ink or arguments based on the alleged dual identity of a citizen as both a natural and a legal person. The activities of the movement pose a challenge to public administration and the banking sector, which are increasingly being targeted. Polish institutions should consider implementing procedure modelled on the US solutions, such as:

- training employees to recognise the characteristic behaviours of movement members and their documents,
- unequivocally rejecting pseudo-legal claims,
- consistently responding to any attempts to destabilise public order.

### Education of public officials

In Poland, officials are generally not sufficiently trained to effectively and clearly explain legal theory to individuals who attempt to challenge the legal order using pseudo-legal documents. Burdened with a high volume of cases, they do not have time for extensive debates and detailed explanations. According to the author, this may lead to increased frustration among people identifying with the sovereign citizen movement, whose questions about the legitimacy of the authorities remain unanswered in a comprehensive manner. A solution could be to develop a handbook for public administration employees, similar to brochures published in the United States<sup>63</sup>, containing information about the methods and manipulations used by sovereign citizen supporters, examples of how to deal with them and

<sup>62</sup> B. Łódzki, *Fake news – dezinformacja w mediach internetowych i formy jej zwalczania w przestrzeni międzynarodowej* (Eng. Fake news – disinformation in online media and forms of combating it in the international space), “Polityka i Społeczeństwo” 2017, vol. 15, no. 4, pp. 19–30. <https://doi.org/10.15584/polispol.2017.4.2>.

<sup>63</sup> M. Crowell, *A Quick Guide to Sovereign Citizens*, “Administration of Justice Bulletin” 2015, no. 4, <https://www.sog.unc.edu/sites/default/files/reports/aojb1504.pdf> [accessed: 1 VII 2025]; *A Quick Guide to Sovereign Citizens*, UNC School of Government, November 2013, <https://www.sog.unc.edu/sites/www.sog.unc.edu/files/Sov%20citizens%20quick%20guide%20Nov%202013.pdf> [accessed: 1 I 2025].

templates for responding to their letters addressed to public institutions. The Polish document of this kind could include guidelines on how to deal with applicants who use pseudo-legal arguments, as well as instructions on how to proceed when they disrupt the functioning of an office. This type of instructions would not only improve the quality of service but could also contribute to more effective responses to attempts to destabilise the operations of public offices.

The problem of the lack of effective ways to respond to the actions of Polish sovereign citizen movement towards public offices has been noted by Bartosz Mendyk. The author addresses the problem of Teresa Garland distributing petitions in which she refers to conspiracy theories, spreads pro-Russian propaganda, and uses hate speech against Jews and Ukrainians<sup>64</sup>. Mendyk points out not only the problematic nature of these petitions, which, from the perspective of officials, contain demands unrelated to the needs of local communities, but also the issue of the obligation to publish such petitions in the Bulletin of Public Information (BIP). In this way, the movement's materials – in this case Teresa Garland's – become more accessible. Mendyk notices that Teresa Garland's letters do not meet the requirements set out in the *Act of 11 July 2014 on petitions*, constitute an abuse of the right to petition, and that a public administration body may, in such a case, determine that such an abuse has occurred and leave the petition without consideration and without publication. It is worth to emphasise, that state and local government institutions (...) *which, in connection with their activities, become aware of the commission of an offence prosecuted ex officio are obliged to immediately notify the public prosecutor or the Police and to undertake the necessary measure – until the arrival of the authority responsible for prosecuting offences or until that authority issues an appropriate order – in order to prevent the destruction of traces and evidence of the offence*<sup>65</sup>.

### Introduction of provisions limiting so-called institutional vexatious litigation

An important aspect of the discussed issue is the phenomenon of so-called institutional vexatious litigation. This should be understood as the submission of numerous groundless complaints or letters with the aim of prolonging proceedings or disrupting the work of the administration. So far, the phenomenon of vexatious

<sup>64</sup> B. Mendyk, *Jak reagować na petycje pełne teorii spiskowych?* (Eng. How to respond to petitions full of conspiracy theories?), Pismo Samorządu Terytorialnego "Wspólnota", 3 IV 2024, <https://wspolnota.org.pl/newsletter/jak-reagowac-na-petycje-pelne-teorii-spiskowych> [accessed: 1 I 2025].

<sup>65</sup> Article 304 § of the Act of 6 June 1997 – *Code of criminal procedure*.

litigation has been described in the literature in the context of judiciary<sup>66</sup>. Lech Jamróz emphasises, that the right to access to a court is not absolute and may be restricted in cases of obstructive or malicious actions. Similarly, the same approach could be applied to vexatious behaviour in public administration, which aims to sabotage the work of public authorities. Currently, the law allows for the penalisation of behaviour disrupting public order under the Article 51 of the Code of petty crimes, however, it is worth to consider if additional provisions are needed to more effectively limit such actions, particularly in cases of persistent or organised vexatious conduct.

#### **Regulations concerning the use of imitations of state symbols and threats against institutions**

The Polish law does not provide for penalties for creating graphics that imitate state seals, as long as they differ from the official versions by at least one element. This allows the sovereign citizen movement to use graphics, that to an uninformed observer, may appear to be official seals. An example of this is the use of seals of fictitious bodies, historical state insignia or the names of former state structures, which can mislead both citizens and public officials. To limit potential abuses in this area, the legislator could introduce provisions regulating the use of symbols and graphics that closely resemble official seals and documents.

In conclusion, the article presents the threats that movements inspired by the US sovereign citizen movement may pose to the legal order and public security in Poland. An effective response to the actions of sovereign citizens requires cooperation between the public and private sectors, as well as educational and legislative measures aimed at limiting the spread of such ideologies.

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<sup>66</sup> L. Jamróz, *Prawo do sądu a zjawisko pieniactwa sądowego* (Eng. The right to a fair trial and the phenomenon of judicial litigation), in: *Dookoła Wojtek... Księga pamiątkowa poświęcona Doktorowi Arturowi Wojciechowi Preisnerowi*, R. Balicki, M. Jabłoński (eds.), Wrocław 2018, pp. 495–504, <https://repozytorium.uni.wroc.pl/dlibra/publication/95758/edition/89860/prawo-do-sadu-a-zjawisko-pieniactwa-sadowego-jamroz-lech> [accessed: 18 X 2024].

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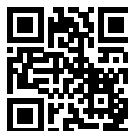
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