

IN THE COURT OF APPEALS OF TENNESSEE
AT JACKSON

September 16, 2026 Session

FOUNT HOLLAND ET AL. v. JARRIN JACKSON**Appeal from the Chancery Court for Weakley County****No. 26155 W. Michael Maloan, Chancellor**

No. W2025-01652-COA-R3-CV

Appellant contests the foreign judgment that Appellees filed in the trial court. The trial court concluded that the judgment was entitled to enforcement in Tennessee. Discerning no error, we affirm.

**Tenn. R. App. 3 Appeal as of Right; Judgment of the Chancery Court
Affirmed and Remanded**

VALERIE L. SMITH, J., delivered the opinion of the court, in which CARMA DENNIS MCGEE and STEVEN W. MARONEY, II, JJ., joined.

Jarrin Jackson, Greenfield, Tennessee, appellant, *pro se*.

Lowe Finney, Martin, Tennessee, for the appellees, Campaign Advocacy Management Professionals, LLC, and Fount Holland.

OPINION**I. Background****Underlying Oklahoma Lawsuit**

In 2022, Appellant Jarrin Jackson campaigned for a seat in the Oklahoma State Senate against Ally Seifried.¹ Ms. Seifried retained Campaign Advocacy Management Professionals, LLC (“CAMP”) as political consultants during her campaign. CAMP is owned by Fount Holland (together with CAMP, “Appellees”). On August 19, 2022, Appellees filed a petition in the District Court of Tulsa County, Oklahoma (the “Oklahoma

¹ Ultimately, Mr. Jackson lost to Ms. Seifried.

trial court”) against Mr. Jackson alleging defamation, false light invasion of privacy, and negligence for statements he made concerning Mr. Holland and CAMP during the campaign. Although the Oklahoma trial court dismissed the negligence action, Appellees’ claims of defamation and false light invasion of privacy continued to trial. While Mr. Jackson appealed the continuation of the remaining claims to the Oklahoma Supreme Court, his appeal was dismissed because he failed to file an appellate brief. In the Oklahoma trial court, Mr. Jackson did not participate in either pretrial discovery or the pretrial conference order concerning Appellees’ remaining claims. On November 26, 2024, the Oklahoma trial court entered a default judgment against Mr. Jackson in favor of Appellees on the issues of defamation and false light invasion of privacy. Thereafter, the Oklahoma trial court held a trial concerning damages. Mr. Jackson did not appear. On March 13, 2025, the Oklahoma trial court entered a judgment of \$4,085,581.27 against Mr. Jackson in favor of Appellees. Thereafter, Mr. Jackson appealed the judgment to the Oklahoma Court of Appeals, discussed further below.

Tennessee Legal Proceeding

While the appeal of the Oklahoma lawsuit was pending, on June 3, 2025, Appellees filed, in the Weakley County Chancery Court (the “trial court”), a notice of filing of foreign judgment with an accompanying affidavit in support, seeking to register the \$4,085,581.27 Oklahoma judgment against Mr. Jackson in Tennessee. On June 20, 2025, Mr. Jackson filed a pleading titled “Affidavit and Motion to Dismiss for Lack of Jurisdiction.” On August 22, 2025, Appellees filed a response to the motion to dismiss.

On August 25, 2025, the trial court heard the motion to dismiss. The trial court directed the parties to file additional briefing “as to whether or not an oath is required [in a civil lawsuit for defamation in Oklahoma] [and] whether or not a bond is required on appeal from a civil judgment to stay an execution[.]” On August 26, 2025, Mr. Jackson filed a memorandum of law. On September 3, 2025, Appellees filed a memorandum of law. On September 10, 2025, Mr. Jackson filed an answer to Appellees’ memorandum.

On September 16, 2025, the trial court issued a letter opinion to the parties making certain findings of fact and conclusions of law therein. By order entered October 6, 2025, the trial court denied the motion to dismiss and concluded that the Oklahoma judgment was entitled to full faith and credit and enforcement. The September 16, 2025, letter opinion was incorporated into the final order.

On October 13, 2025, Mr. Jackson filed an “Affidavit and Application for Writ in Error Status, Standing, and Jurisdiction” in the Tennessee Supreme Court. By order entered October 22, 2025, the Tennessee Supreme Court transferred the matter to this Court.

On September 16, 2026, this Court heard oral argument from both parties. That

day, Appellees filed a motion to consider post-judgment facts under Tennessee Rule of Appellate Procedure 14 and asked this Court to take judicial notice of the Oklahoma Court of Appeals opinion, which was entered on June 23, 2026. We recall that the Oklahoma appeal concerned the underlying defamation case, which resulted in a \$4,085,581.27 judgment against Mr. Jackson. That judgment is what Appellees seek to enforce in Tennessee. On September 17, 2026, this Court entered an order deferring entry of an order on the motion to consider post-judgment facts. On October 1, 2026, Mr. Jackson filed a response agreeing that the Court should take notice of the Oklahoma Court of Appeals opinion. On October 23, 2026, Appellees filed a second motion to consider post-judgment facts, asking this Court to take judicial notice of the Oklahoma Supreme Court's denial of Mr. Jackson's petition for writ of certiorari, which was entered on October 19, 2026. As of the date of the filing of this Opinion, Mr. Jackson has not filed a response to the second motion.

In relevant part, Rule 14 provides:

The Supreme Court, Court of Appeals, and Court of Criminal Appeals on its motion or on motion of a party may consider facts *concerning the action that occurred after judgment*. Consideration of such facts lies in the discretion of the appellate court. While neither controlling nor fully measuring the court's discretion, *consideration generally will extend only to those facts, capable of ready demonstration, affecting the positions of the parties or the subject matter of the action such as mootness, bankruptcy, divorce, death, other judgments or proceedings, relief from the judgment requested or granted in the trial court*, and other similar matters. Nothing in this rule shall be construed as a substitute for or limitation on relief from the judgment available under the Tennessee Rules of Civil Procedure or the Post-Conviction Procedure Act.

Tenn. R. App. P. 14(a) (emphasis added); *see also* Tenn. R. App. P. 13(c) ("The Supreme Court, Court of Appeals, and Court of Criminal Appeals may consider those facts established by the evidence in the trial court and set forth in the record *and any additional facts that may be judicially noticed or are considered pursuant to rule 14.*") (emphasis added). This Court has explained that

[j]udicial notice is "a method of dispensing with the necessity for taking proof." *State ex rel. Schmittou v. City of Nashville*, 208 Tenn. 290, 345 S.W.2d 874, 883 (1961). "Judicial notice is generally defined as a judge's utilization of knowledge other than that derived from formal evidentiary proof in the pending case." *Counts v. Bryan*, 182 S.W.3d 288, 291 (Tenn.Ct.App.2005). Tennessee Rule of Evidence 201 governs judicial notice of adjudicative facts. A judicially noticed fact must be one that is not subject to reasonable dispute. Tenn. R. Evid. 201(b). It must be either (1)

generally known within the territorial jurisdiction of the trial court or (2) capable of accurate and ready determination by resort to sources whose accuracy cannot reasonably be questioned. Tenn. R. Evid. 201(b). Furthermore, a court may take judicial notice whether a party requests it or not. Tenn. R. Evid. 201(c).

Bank of Am., Nat'l Ass'n v. Meyer, No. M2014-01123-COA-R3-CV, 2015 WL 1275394, at *2 (Tenn. Ct. App. Mar. 17, 2015). Given that the Oklahoma appeal and denial of certiorari concern the validity of the underlying judgment that Appellees seek to enroll in Tennessee, we grant Appellees' motions to consider post-judgment facts. Specifically, we take judicial notice of the Oklahoma Court of Appeals opinion and the Oklahoma Supreme Court's decision concerning Mr. Jackson's petition for writ of certiorari, discussed below.

On June 23, 2026, the Oklahoma Court of Appeals affirmed the \$4,085,581.27 judgment against Mr. Jackson. The Oklahoma Court of Appeals discussed that Mr. Jackson's brief "challenge[d] the judgment on a single ground: that the [Oklahoma trial court] took personal jurisdiction over [Mr. Jackson] without due process of law."² Noting that the standard of review was *de novo*, the Oklahoma Court of Appeals concluded that Mr. Jackson failed to properly raise and preserve the issue of personal jurisdiction in the Oklahoma trial court. Accordingly, the Oklahoma Court of Appeals determined that Mr. Jackson waived the defense of lack of personal jurisdiction, and the Court declined to consider the issue on appeal. Mr. Jackson appealed this ruling to the Oklahoma Supreme Court. On October 19, 2026, the Oklahoma Supreme Court denied Mr. Jackson's petition for writ of certiorari.³

II. Discussion

We recognize that Mr. Jackson is representing himself in this appeal. It is well-settled that "pro se litigants are held to the same procedural and substantive standards to which lawyers must adhere." *Brown v. Christian Bros. Univ.*, 428 S.W.3d 38, 46 (Tenn. Ct. App. 2013). While "[p]arties who choose to represent themselves are entitled to fair and equal treatment by the courts[.]" *Hodges v. Tenn. Att'y Gen.*, 43 S.W.3d 918, 920 (Tenn. Ct. App. 2000) (citing *Paehler v. Union Planters Nat'l Bank, Inc.*, 971 S.W.2d 393, 396 (Tenn. Ct. App. 1997)), "courts must not excuse pro se litigants from complying with the same substantive and procedural rules that represented parties are expected to observe." *Young v. Barrow*, 130 S.W.3d 59, 63 (Tenn. Ct. App. 2003) (citing *Edmundson v. Pratt*, 945 S.W.2d 754, 755 (Tenn. Ct. App. 1996); *Kaylor v. Bradley*, 912 S.W.2d 728, 733 n.4 (Tenn. Ct. App. 1995)).

² On our review, this opinion does not appear on Westlaw. However, it can be accessed here: <https://perma.cc/9QLT-YVS3>.

³ The Oklahoma Supreme Court's order can be accessed here: <https://perma.cc/99G4-CCMA>.

We turn to review an important rule of our Tennessee Rules of Appellate Procedure. Rule 27(a)(7)(A), *requires* an appellant's brief to include:

- (1) A table of contents, with references to the pages in the brief;
- (2) A table of authorities, including cases (alphabetically arranged), statutes and other authorities cited, with references to the pages in the brief where they are cited;

- (4) A statement of the issues presented for review;
- (5) A statement of the case, indicating briefly the nature of the case, the course of proceedings, and its disposition in the court below;
- (6) A statement of facts, setting forth the facts relevant to the issues presented for review with appropriate references to the record;
- (7) An argument, which may be preceded by a summary of argument, setting forth:

- (A) the contentions of the appellant with respect to the issues presented, and the reasons therefor, including the reasons why the contentions require appellate relief, with citations to the authorities and appropriate references to the record (which may be quoted verbatim) relied on; and

- (B) for each issue, a concise statement of the applicable standard of review (which may appear in the discussion of the issue or under a separate heading placed before the discussion of the issues);

- (8) A short conclusion, stating the precise relief sought.

Tenn. R. App. P. 27(a).

Mr. Jackson's "brief" contains none of the above required components. Rather, it consists of three pages, divided into four sections, which he labels: (1) "Constitutional Question;" (2) "Oklahoma's Error – Prohibited Form Violated Due Process of Law;" (3) "Tennessee's Error – Prohibited Form Violated Due Process of Law;" and (4) "Demand for Oral Arguments." Under "1. Constitutional Question," Mr. Jackson writes:

Please take Notice that I ask: “Where in any constitution is any government granted any authority to pry into life and liberty without the swearing of harm? (see evidence below):

Maxim: “Injury is not presumed.” *Co. Litt.* 232

The following three sections conform to a similar format wherein Mr. Jackson provides a “notice” followed by what he states is “evidence.” While very difficult to understand, we deduce that Mr. Jackson argues that the Oklahoma trial court erred by entering a judgment against him when the pleading on which the judgment was based was not sworn to under oath. This, he alleges, prevented the Oklahoma trial court from obtaining “jurisdiction” over him. According to Mr. Jackson, because the Oklahoma trial court had no jurisdiction over him, the trial court had no authority to enroll the Oklahoma judgment. Mr. Jackson’s “arguments” are not predicated on any statutory or case law from either Tennessee or Oklahoma; quite the opposite. First, Mr. Jackson alleges that the trial court’s actions violated his “due process of law,” which he distinguishes from “due process.” He asserts that “[d]ue process of law” is guaranteed by constitutions to prevent the use of statutory procedures.” Mr. Jackson further argues that the “common law” “prescribes a form of law requiring plaintiffs [to] support petitions under oath,” and that “the common law, by definition, is the law used to determine questions of right.” Mr. Jackson uses the purported definition of “common law” from the 4th edition of Black’s Law Dictionary (1951), to-wit:

As distinguished from law created by the enactment of legislatures, the common law comprises the body of those principles and rules of action, relating to the government and security of persons and property, which derive their authority solely from usages and customs of immemorial antiquity, or from the judgment and decrees of the courts recognizing, affirming, and enforcing such usages and customs.

If we follow his argument correctly, Mr. Jackson alleges that the Oklahoma trial court “disobeyed the law’s prescribed form of due process of law when it took jurisdiction over [his] rights based on a petition without an oath in its cause.” He further argues that “Tennessee must deny foreign judgments if it is shown by the record that the facts necessary to give the original court its jurisdiction didn’t exist.” Mr. Jackson asserts that the trial court erred when it “gave [him] a non-judicial process instead of the ‘law of the land’ as required by the Tennessee Constitution.” Going one step further, Mr. Jackson alleges that the trial court “didn’t judicially notice ‘law of the land’ written in the Tennessee Constitution nor ‘due process of law’ written in the Oklahoma Constitution.” He argues that “[b]oth of these rights are guaranteed so to as to prevent legislatures from making any process ‘due process of law’ by its mere will,” and that “[n]o judge can use a statute to determine a question of right.” Mr. Jackson cites only two cases to support his arguments, *Smith v. Spizzirri*, 601 U.S. 472 (2024) and *Lexecon Inc. v. Milberg Weiss Bershad Hynes & Lerach*, 523 U.S. 26, 35 (1998), neither of which concern what we perceive to be his issue. Although he briefly cites the Oklahoma and Tennessee Constitutions, most of the

“authority” on which Mr. Jackson relies are various maxims along with the 4th edition of Black’s Law Dictionary from 1951. In his demand for oral arguments, Mr. Jackson asserts: “[T]his matter has a long history of government wrongly presuming legislation regulates constitutional rights and it is a necessity that government rightly understands and applies the law.” He further argues that “[t]his Court’s inquiry shall benefit by discerning the clash of these two different theories of law: fundamental principles and modern statutory schemes.” Mr. Jackson’s “reply brief” follows a similar format as his initial “brief,” and makes equally confusing “arguments.”

At oral argument before this Court, Mr. Jackson’s arguments focused on the “constitutional law of the land.” Specifically, he argued that

[t]here is a historic common law custom that requires plaintiffs to support their petitions by oath. If someone brings an action to a tribunal and there is no oath in the cause, government has no constitutionally conferred jurisdiction, it is an invalid tribunal from the beginning, and as such, it cannot take jurisdiction over people.

Mr. Jackson argued that “people” created “government” and reserved constitutional rights outside of “government’s general powers.” He alleged that, accordingly, judges are required to “look to texts of constitutions and fundamental principles.” Mr. Jackson argued that the trial court was “duty bound” to consider the “law of the land” and the text of the Tennessee Constitution along with what “law of the land” meant when this State was adopted into the Union. Mr. Jackson made the same argument with respect to Oklahoma and its constitution. In his rebuttal, Mr. Jackson concluded:

I don’t have to respond to anybody if they don’t have power over me. The fact that people don’t recognize my constitutional right is the issue for the courts to say we are going to protect individual liberty against these modern practices that bypass constitutional text. . . . The law is the Constitution Article II, Section 7 that says . . . no person shall be deprived life, liberty, or property without due process of law. . . . If I have the right to law of the land, there can’t be any statute in government that goes against that.

Mr. Jackson’s arguments and pleadings sound in the “sovereign citizen” ideology, although he does not characterize his theories in this way. This Court has encountered sovereign citizen laden arguments twice before in the recent cases of *Allen v. Jackson Energy Authority*, No. W2025-01029-COA-R3-CV, 2026 WL 2296032 (Tenn. Ct. App. Aug. 10, 2026) and *Allen v. Blackbaud, Inc.*, No. W2025-01484-COA-R3-CV, 2026 WL 1987603, at *5 (Tenn. Ct. App. July 9, 2026) (together, the “*Allen*” cases). Therein, we explained that

“[s]overeign citizens (or ‘sovereigns’) are a ‘loosely knit network’ of

individuals who express—and act on—a shared anti-government sentiment.” *United States v. Cook*, No. 3:18-CR-00019, 2019 WL 2721305, at *1-2 (E.D. Tenn. June 28, 2019) (citing Joshua P. Weir, *Sovereign Citizens: A Reasoned Response to the Madness*, 19 LEWIS & CLARK L. REV. 830, 834 (2015)). Although each sovereign citizen’s philosophies and conspiracy theories can vary, their core belief is that “they do not recognize federal, state, or local laws, policies, or regulations.” U.S. Dep’t of Justice, F.B.I., Counterterrorism Analysis Section, *Sovereign Citizens: A Growing Domestic Threat to Law Enforcement*, (Sept. 2011), <https://perma.cc/9GPY-28A3> (last visited July 2, 2026). Rather, they follow their own set of laws. *Id.*

Blackbaud, Inc., 2026 WL 1987603, at *5. The *Allen* cases involved the “redemptionist” or “strawman” theory, which we described as a common debt avoidance scheme. *See Jackson Energy Auth.*, 2026 WL 2296032, at *4-5; *Blackbaud, Inc.*, 2026 WL 1987603, at *5-6. In those cases, we discussed some of the “magic words” that appear in sovereign citizen filings, particularly those attempting to employ the redemptionist theory. *Burns v. Wright*, No. C17-5842RBL, 2017 WL 10103547, at *1 (W.D. Wash. Dec. 12, 2017) (noting that sovereign citizen pleadings are often “magic word” filings that address neither the facts of the case nor the substance of the pleadings). We do the same now with the “magic words” and phrases that appear throughout Mr. Jackson’s arguments and pleadings in this appeal.

As described at length above, Mr. Jackson’s arguments focus on “common law,” the “law of the land,” and his interpretation of the rights guaranteed him under the Constitution (here, Tennessee and Oklahoma). In his memorandum of law filed in the trial court, Mr. Jackson asserts that the “common law” to which he refers is what was “understood at the founding of the nation.” This is a common “argument” of the sovereign citizen ideology. *See generally United States v. Gooch*, 595 F. App’x 524, 527 n.1 (6th Cir. 2014) (noting that “[i]n general, sovereign citizens believe that the United States Government . . . is a fraud and that ‘they, the sovereign citizens, retain an individual common law identity exempting them from the authority of those fraudulent government institutions’”) (internal citation omitted); *Dixon v. Pennsylvania*, No. 1:25-CV-1916, 2026 WL 453121 (M.D. Pa. Jan. 5, 2026). “[I]t is an anti-government movement founded upon the notion [that] the American government created by the Founding Fathers, the ‘common law’ system, was replaced with a fake, illegitimate government[.]” Mellie Ligon, *The Sovereign Citizen Movement: A Comparative Analysis with Similar Foreign Movements and Takeaways for the United States Judicial System*, 35 EMORY INT’L L. REV. 297, 300-01 (2021). “Sovereign citizens are only governed by the common law unless they consent to other rules ‘knowingly, willingly, and voluntarily.’ The ‘other rules’ in this context are the federal, state, and local laws that we live under in the American legal and political systems.” Phillip A. Hendges, *An Analysis of: People, for Michigan Republic, Ex Rel v. State of Michigan*, 30 J. MARSHALL L. REV. 937, 954 (1997). To a sovereign citizen, “common law” is the “law of the land” and is to be distinguished from “statutory law.” *See*

Susan P. Koniak, *When Law Risks Madness*, 8 CARDOZO STUD. L. & LITERATURE 65, 71 (1996).

We also briefly review Mr. Jackson's filings in this Court to provide examples of the words and phrases used in sovereign citizen-esque pleadings. On December 26, 2025, this Court entered an administrative order directing Mr. Jackson to "either file with the trial court clerk a transcript of the evidence, a statement of the evidence, or a Tenn. R. App. P. 24(d) notice, or else show cause in this [C]ourt why the appeal should not be dismissed for failure to comply with Tenn. R. App. 24." On January 6, 2026, this Court received a pleading titled "Notice of Filing Certified Transcript to Complete Record and Status Correction." Directly below this title was the following declaration: "**Notice to Agent is Notice to Principal and Notice to Principal is Notice to Agent.**" (Emphasis in original). Each of Mr. Jackson's pleadings filed in this Court contains this declaration and it is commonly found within sovereign citizen pleadings. See *Williams v. U.S. Sec'y of State*, No. 1:25-CV-1405, 2025 WL 4233084, at *2 (W.D. Mich. Nov. 21, 2025) (citing *Smithson v. Koons*, No. 1:15-cv-1757, 2017 WL 3016165, at *2 (M.D. Pa. June 26, 2017)); *Lewis v. LVNV Funding, LLC*, No. CV 24-322-JWD-EWD, 2024 WL 4280942, at *4 (M.D. La. Sept. 24, 2024). Each of Mr. Jackson's pleadings in this Court also begin with him referring to himself as "one of the people," "republican in form," and "*sui juris*." The designation of oneself as "one of the people" and "*sui juris*" is common among those subscribing to the sovereign citizen ideology. See *Fitts v. Newberry*, No. 4:23-CV-225-TCK-JFJ, 2023 WL 4919666, at *2 (N.D. Okla. Aug. 1, 2023); *Patten v. Lown*, No. 2:20-CV-605-FTM-66MRM, 2020 WL 8461564, at *3 (M.D. Fla. Sept. 10, 2020); *Burns*, 2017 WL 10103547, at *1. In his January 6, 2026, pleading, Mr. Jackson takes issue with the trial court reporter's characterization of him as "pro se," which Mr. Jackson alleges is "contrary to [Mr. Jackson's] instruments." Mr. Jackson asserts that "Government must take notice that [Mr. Jackson] comes to proceedings by right (*Sui Juris*) and that government errs otherwise." Such objection is also common among those with sovereign citizen beliefs. See *Dolen-Cartwright on behalf of G.C. v. Alexander*, No. CV 21-527-JWD-RLB, 2022 WL 848088, at *5 (M.D. La. Feb. 24, 2022) (discussing that the terms "pro se" and "*sui juris*" are not mutually exclusive). "The term *sui juris* is a Latin term and translates as 'of one's own right; independent.'" *Winsey v. Nationstar Mortg. LLC*, No. 8:17-CV-979-T-33AEP, 2017 WL 2931381, at *1 (M.D. Fla. July 10, 2017) (quoting *Sui juris*, BLACK'S LAW DICTIONARY (10th ed. 2014)). "In the legal field, *sui juris* is used to signify someone who has reached the age of majority or someone who possesses full civil rights." *Id.* We also note that all of Mr. Jackson's pleadings with this Court contain his "autograph," rather than his "signature," another common characteristic of sovereign citizen pleadings. *Barksdale v. New Am. Funding, LLC*, No. 2:24-1240, 2025 WL 2345174, at *6 (W.D. Pa. Aug. 13, 2025).

As discussed above, Mr. Jackson's appellate "briefing" wholly fails to comply with our appellate rules. Given Mr. Jackson's appellate arguments, it is unsurprising that he does not believe himself to be bound by them. While his briefing may be an implicit

rejection of our rules, Mr. Jackson’s other pleadings are more explicit. On February 17, 2026, Mr. Jackson filed a pleading titled “Notice and Constitutional Demand to Plead in Simplicity.” In part, this pleading stated:

Please take Notice that I, by right, will prosecute my action by written correspondence. *Moreover, my constitutional right to the “law of the land” guarantees me a judicial process that cannot be derogated by any rules of any court,* and so there is no constitution that grants authority compelling me to use electronic filings. . . .

(Emphasis in original) (emphasis added). On March 17, 2026, this Court entered another administrative order noting that Mr. Jackson failed to file an appellate brief or an extension of time for doing so. We directed Mr. Jackson to file a brief or show cause why the appeal should not be dismissed. On March 25, 2026, Mr. Jackson filed a pleading titled “Notice of Brief (W2025-01652-COA-R3-CV),” which this Court has interpreted as his appellate brief, discussed at length above. On April 8, 2026, Mr. Jackson filed a pleading titled “Notice of Clarity Regarding Constitutional Rights Being Regulated by Statute and/or Rules.” This pleading provided, in part:

Please take Notice that *this Court did not answer my Notice (dated 2-11-2026) regarding my right to plead in simplicity with constitutional authority that obligates the form of petition. As such, my constitutional right overcomes any “defect” arbitrarily determined by a clerk. This Court has judicial notice of sworn claims that government deprived a constitutional right. I am guaranteed a judicial determination regarding that question of right. This Courts errs if it administratively dismisses my action because of administrative defects, because judicial writs do not fail for defects[.]*

Please take Final Notice that *I demand this Court show constitutional authority binding the form of my petition; specifically, show a constitutional authority that grants a general power for courts to dismiss actions of right if petitioners fail to have blue cover sheets, word counts, multiple copies, and special bindings. Courts are judicial and must defend rights. This Court’s “defects” show it errs against its obligation to give “law of the land.”*

(Emphasis in original) (emphasis added). Although this Court could decline to consider the substantive issue on appeal due to Mr. Jackson’s failure to comply with our rules, *Bean v. Bean*, 40 S.W.3d 52, 54-55 (Tenn. Ct. App. 2000), for good cause, we address what we perceive to be Mr. Jackson’s sole issue. Tenn. R. App. P. 2. We caution future litigants to

adhere to our appellate rules and warn that we may not be so lenient in the future.

We recall that this appeal comes to us on the trial court’s entry of a foreign judgment for enforcement. “Tennessee’s Uniform Enforcement of Foreign Judgments Act [(the “Act”)] provides a streamlined process for the recognition or enrollment of a foreign judgment and the enforcement thereof.” *Baumann v. Williams*, No. M2006-00962-COA-R3-CV, 2007 WL 3375365, at *2 (Tenn. Ct. App. Nov. 13, 2007). The Act defines a “foreign judgment” as “any judgment, decree, or order of a court of the United States or of any other court which is entitled to full faith and credit in this state.” Tenn. Code Ann. § 26-6-103. “Once a foreign judgment has been enrolled, it has the same effect and is subject to the same procedures, defenses, and proceedings for reopening, vacating, or staying as a judgment of a court of record in Tennessee and may be enforced or satisfied in a like manner.” *Coastcom, Inc. v. Cruzen*, 981 S.W.2d 179, 181 (Tenn. Ct. App. 1998) (citing T.C.A. § 26-6-104(c)). There are three recognized exceptions to the enrollment of a foreign judgment. “Specifically, a forum state may decline to accord full faith and credit to a foreign judgment of another state if it is: (1) void due to a lack of personal or subject matter jurisdiction, (2) based upon fraud, or (3) where enforcement of the judgment would violate the public policy of the forum state.” *Guseinov v. Synergy Ventures, Inc.*, 467 S.W.3d 920, 925 (Tenn. Ct. App. 2014) (citations omitted). “Parties seeking to undermine the validity of a foreign judgment must meet a ‘stern and heavy’ burden to demonstrate that the foreign judgment should not be enforced in Tennessee.” *Coastcom, Inc.*, 981 S.W.2d at 181 (citing *Dement v. Kitts*, 777 S.W.2d 33, 36 (Tenn. App. 1989)).

Mr. Jackson made the same argument to the trial court that he makes to this Court. He asserts that the Oklahoma judgment is void because the Oklahoma trial court lacked jurisdiction over him. He argues that the Oklahoma trial court lacked jurisdiction over him because, at “common law,” a plaintiff’s pleading against a defendant required an oath, and Appellees’ initial petition against Mr. Jackson did not contain an oath. On this Court’s review, Oklahoma does not require an oath or verification to file a civil lawsuit for defamation. *See* 12 Okla. Stat. Ann. § 2011(A), (B). Mr. Jackson provides this Court with no authority to show otherwise. Rather, as discussed at length above, Mr. Jackson asks this Court to reject this “modern” law and return to the “common law,” *i.e.*, that which was “understood at the founding of the nation,” which allegedly required plaintiffs to support their petitions under oath. We decline Mr. Jackson’s invitation.⁴ As we did in the *Allen* cases, we emphasize that Mr. Jackson’s “arguments” are illogical, founded in neither Tennessee nor Oklahoma law, are a waste of judicial and party resources, and will not be

⁴ Although Mr. Jackson did not raise this as an issue, for completeness, we note that the Act requires a court to stay enforcement of a foreign judgment where “the judgment debtor shows the court . . . that an appeal from the foreign judgment is pending or will be taken, or that a stay of execution has been granted[.]” Tenn. Code Ann. § 26-6-106(a). As discussed above, on June 23, 2026, the Oklahoma Court of Appeals affirmed the underlying \$4,085,581.27 judgment against Mr. Jackson, and, on October 19, 2026, the Oklahoma Supreme Court denied Mr. Jackson’s petition for writ of certiorari. Accordingly, the underlying litigation in Oklahoma has reached final adjudication.

indorsed by Tennessee Courts. *Jackson Energy Auth.*, 2026 WL 2296032, at *7; *Blackbaud, Inc.*, 2026 WL 1987603, at *9.

III. Conclusion

For the foregoing reasons, the trial court's order is affirmed. The case is remanded for such further proceedings as are necessary and consistent with this opinion. Costs of the appeal are assessed to the Appellant, Jarrin Jackson. Execution for costs may issue if necessary.

s/ Valerie L. Smith

VALERIE L. SMITH, JUDGE