

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

J.G.G. et al.,)	Case No. 1:25-cv-766 (JEB)
Plaintiff,)	
v.)	
DONALD J. TRUMP, in his official)	
capacity as President of the United)	
States, et al.,.)	
Defendant.)	

**BRIEF OF AMICUS CURIAE
MEGHAN KELLY**

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US Supreme Court No 283696
DC License retired 2019, No. 981781

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I, Meghan Kelly, Esq.¹ respectfully submit this amicus brief in support of neither party, to present arguments neither party asserted to prevent the dissolution of these United States. Although my arguments are unfavorable to Defendants. Neither party provided opposition to an amicus before this court (“ct”) or to the US Supreme ct (“USSC”) either.

I. Argument

A Interest in the case

I am in a unique position and have special knowledge to present issues that apply to this case to aid the ct and the parties to preserve the rule of law. Other parties or their counsel are attacked for restraining President Trump (“Trump”) within the purview of the Constitutional limits. US Attorney Generals (“AGs”) are sitting beholden to Trump to secure seats as not yet nominated and confirmed. Those who safeguard the government not merely the President face reprisal in violation of Equal protections and due process rights to petition on behalf of all government, not merely one man should they contest Trump. State AGs are overwhelmed by Trump suits.² Lawyers are retaliated against in private firms and extorted for free pro bono for past conflicts with President’s agenda, like Skadden. Even the USSC and federal judges are threatened to affect the outcome of the cases, including this case in violation of the right to petition fairly in accord with due process, and separation of powers.

I am in a unique position and have special knowledge that there is a plan to eliminate the judiciary. In 2018, I ran for office per the attached news article because non-lawyers were lawyering messing up the chain of title and costing the public and private people equitable and

¹ The undersigned certifies that no party’s counsel authored this brief in whole or in part, and that no party, party’s counsel, or any other person other than amicus contributed money that was intended to fund preparing or submitting this brief.

² See Exhibits 1-8, also see, <https://www.congress.gov/bill/119th-congress/house-resolution/241/text>, See, https://static.project2025.org/2025_MandateForLeadership_FULLL.pdf with regards to eliminating AGs not beholden to Trump

monetary harm unrestrained. I learned there was a plan to eliminate judges to eliminate the rule of law that founded, sustains and maintains these United States as a democratic-republic with the passage of the bill of rights in Dec 15, 1791 granting the people the right to petition coupled with due process fairness before impartial forums.

The agenda eliminates the Constitution as law to protect freedoms in favor of lawless unjust bartered for business, allowing only those with power, connections unjust wealth or control over resources and access to them to rule unrestrained from human sacrifice and slavery. Instead, they are rewarded by sustaining problems, to sustain profit streams, power and positions with no check, no government and no law to stop them under the lie of freedom or consent. Please see the attached exhibits for evidence that the petitioners who grant the ct power to say what the rule is and the Courts are the target. (Exhibit 8 B).

The judiciary is in danger, and I believe 1. restraining Article I and II members within the purview of Constitutional limits to protect the fair legal power to petition and 2. removing Presidential or even congressional immunity misused for an unconstitutional purpose, would safeguard the courts and prevent a dissolution. (Article, hereinafter referred to “Art”)

My unique situation, no matter how degrading places me in the position where I may present these issues the court, the parties and everyone else is distracted or otherwise prevented from considering. Other attorneys are threatened, retaliated against or otherwise prevented from bringing up the issues I present by the threat of harm by Art I and II officials or their agents with the intent to influence the outcome of cases or to chill the right to petition to prevent cases restraining Art I and II power or agendas.³ Trump drafted Executive orders to economically

³ <https://www.cbsnews.com/news/law-firm-skadden-cuts-100-million-pro-bono-deal-trump-avoid-executive-order/>

harm law firms⁴ as punishment to compel loyalty and extort pro bono hours to bring petitions beholden to his viewpoint. Trump chills the right to petition to restrain his agenda rendering Trump unchecked. Those who bring up the issues such as the issues I bring before to aid the court, are targeted for harm by additional Art I and II abuse of powers to force outcomes in cases or eliminating potential cases by government threats meant to chill the fundamental right to petition to safeguard life and liberty. US Am I, V.

Should the ct find my arguments unpersuasive, fine, at least it considers the importance and may otherwise maintain the power under *Marbury* “to say what the rule of law is,” from being vitiated by the misconduct of members of the other two branches who are in need of guidance and direction not destruction. USSC held in *Marbury v Madison*, 5 US 137 (1803).

“The very essence of civil liberty certainly consists in the **right of every individual to claim the protection of the laws**, whenever he receives an injury. One of the first duties of government is to afford that protection. **In Great Britain the king himself is sued in the respectful form of a petition, and he never fails to comply with the judgment of his court.** In the 3d vol. of his Commentaries, p. 23. Blackstone states two cases in which a remedy is afforded by mere operation of law. In all other cases," he says, "it is a general and indisputable rule, that where there is a legal right, there is also a legal remedy by suit, or action at law, whenever that right is invaded."

Here, all people risk losing the protections of the law, and the individuals in this case risk great, imminent and egregious harm if the issues I present to aid the ct and the parties are not presented on amicus or otherwise by the party or this ct in this fast-moving case where petitioners do not have fair time to consider or present the unique additional issues. They are working on dire imminent more pressing matters. Trump is not above a King, and must respect the judicial process.

⁴ See, EO 14250, Ex Or. No. 14246 and Ex Or 14244.

I submitted documents with this ct on 4/17/25, found at DI 96, and afterwords, I incorporate all herein in full, including but not limited to *the Amicus petitioner Meghan Kelly's Motion for an exception to pro hac vice rules, given my circumstances*. DE placed my license to practice law on inactive disabled for suing President Trump ("Trump") under the RFRA to alleviate a substantial burden I alleged Trump caused by his establishment of government religion by government church partnerships through certain executive orders, and other conduct.⁵ DE found my private religious beliefs in Jesus Christ, not only unworthy of protection but a disability.⁶ During disciplinary litigation the executive and legislative branches attacked federal judges, specifically members of the USSC, Justice Alito, his wife, Justice Thomas, his wife, and other members of the federal ct concerning issues in my cases to influence the outcomes of my claims unfairly at the appellate stage, thus allowing Art I and II members to continue to unfairly interfere with the right to a fair forum not threatened forum where judges risk impeachment or more insidious harm for disagreeing with Art I and II desired outcomes.⁷

⁵ https://www.supremecourt.gov/DocketPDF/21/21-5522/188298/20210823145007844_Pet%20of%20Writ%20of%20Cert%20part%201%20of%202.pdf and https://www.supremecourt.gov/DocketPDF/21/21-5522/188298/20210823145008172_Pet%20of%20Writ%20of%20Cert%20part%202%20of%202.pdf Petition from the US Supreme court Docket Number 21-5522 Kelly v Trump.

⁶ *Gentile v. State Bar of Nevada*, 501 U.S. 1030, 1054 (1991) ("At the very least, our cases recognize that disciplinary rules governing the legal profession cannot punish activity protected by the 1st Am, and that 1st Am protection survives even when the attorney violates a disciplinary rule he swore to obey when admitted to the practice of law")

⁷ See, https://www.supremecourt.gov/DocketPDF/23/23-7372/330502/20241028234748903_0%20Pet%20for%20rehearing%20dated%20Oct%2028%20filed%20Oct%2029.pdf Also see, https://www.supremecourt.gov/DocketPDF/23/23-7372/330502/20241028234829331_1%20App%20A%20Orders%20App%20B%20congress%20commandeering%20App%20B%20exhibit%208%20scheme%20to%20overthrow%20by%20eliminate%20rule%20of%20law%20civ%20rts.pdf and https://www.supremecourt.gov/DocketPDF/23/23-7360/326307/20240919181110720_Exhibit%202%20Docs%20judicial%20complaint%20Due%20Process%20violations%20violating%20US%20Amend%201%20%20V%20in%20order%20to

USSC did not consider limiting Art I or II official powers to preserve its own Art III powers under separation of powers arguments to the purview of the Constitutional limits so as not to violate the people and public's Constitutional legal power to petition fairly in federal ct without Art I and II threats against federal judges or attorneys to affect the outcome in cases unfairly. US Amend I, V, Art I, II, III. USSC denied my petitions and the cases are closed, possibly because the issues did not arise in the district ct the trial forum, or because Art I members were not parties before the ct as they are here. Trump is a party before this Court, making this case possibly the only vehicle to restrain both Art I and II members from usurping and eliminating Art III power altogether to aid in an insurrection **by the government** under the hypocritical aim of defending a fabricated one at the border.

B. Presidential Immunity should be limited as not to apply to Contempt proceedings or with regards to whether Trump violated Due Process arising in this forum by threatening Honorable Chief Judge Boesberg, the appellate courts with and attorneys with the innuendo of threats

I seek to present arguments to the ct to show past case law, even by this esteemed ct regarding immunity must be overturned, limited or distinguished in order to apply the rule of law to Trump to preserve the court, the people and the public's legal check upon a President, and Art III judicial power from being usurped by President Trump and Congress, **at least with regards to this courts criminal contempt proceeding**, even if the ct rejects consideration of limiting Presidential immunity beyond this exceptional case of first impression.

Congressional or Presidential attacks against parties, AGs, federal judges and their family members to influence the outcome of cases based on viewpoint of speech regarding whether Trump is above the law have arisen recently unrestrained by the courts depriving anyone

[%20evade%20punishment%20and%20gain%20reward%20by%20congressional%20regulations%20and%20Court%20rules.pdf](#)

contesting Executive action of due process and removing the judiciary's balance and check upon executive action. I seek to somehow protect the courts function from being vitiated, the state and US AG's check and the petitioners' herein and people's power to balance and check the government by pet coupled with due process ("DP") without vitiation of rights/claims based on viewpoint of petition, suing, or prosecuting the President ("Pres"), and new DP or EP issues. I believe there is a scheme to eliminate the rule of law to allow for an overthrow by vitiating the power of the courts, and the petitioners including the AGs from using the rule of law to be replaced by a far worse oppressive system of control which will eliminate every freedom and the governments after 2050, with no rule of law to restrain those with power, connections, or wealth to control a no longer free but slave people. I preserve the issues.

Government attacks against perceived dissidents of President Trump to affect the outcome of live cases in violation of US Amend I, V, Art I, III, will continue to eliminate the court's function to allow for the intentional planned dissolution of these United States if the ct does not permit petitioners fair access to the courts in accord with DP and EP and other arguments that affect the outcome of this case.

Trump seeks to eliminate birth right citizenship,⁸ seeks to sell citizen rights by literal citizenship cards,⁹ and on 4/28/25 Trump passed EO 14288¹⁰ appearing to create a foundation for martial law wherein he also enslaves lawyers by compelled involuntary servitude to represent local, county and state police as federal agents who under section 5 may be empowered to threaten local, and state officials perceived as dissidents. AGs, including Defense counsel here, face displacement under the new subscription system where there will be no rule of law,

⁸ <https://www.pbs.org/newshour/politics/supreme-court-sets-date-in-may-to-hear-arguments-on-trumps-birthright-citizenship-order>

⁹ <https://www.cnn.com/2025/02/25/politics/us-gold-card-foreigners-trump>

¹⁰

attorneys, or courts, should someone not seek to restrain misguided government officials not limited to Trump from giving into temptation to allow for a real as opposed to fabricated overthrow. Defendants have deported Americans and children,¹¹ and will likely seek to imprison perceived dissidents in prisons as he previously stated he would like to send Americans to CECOT too.¹² I do not take words lightly.

President Trump's immunity deprives the public and private people of the 1st Amendment right to petition to safeguard other fundamental rights in violation of due process and equal protection and other first amendment and fundamental rights based on viewpoint of speech by petitioning to restrain a President's conduct within the purview of the Const and statutory limits, where the President is unfairly deemed above the law by immunity and the people a President harms are rendered below the law's protection. US Am I, V, IV.

The Constitutionality of Presidential immunity by recent case law and by imprudent finding by the USSC in US v Trump, 939 conflicts and vitiates other Constitutional checks such as the government's check upon all the government via the US AGs. The ct should address immunity at least as applied to contempt or due process issues with equitable declaratory and injunctive findings to prevent a schemed overthrow, and to prevent continued irreparable injury to petitioners, especially petitioners herein in terms of loss of First Amendment rights to petition before they are kidnapped, human trafficked, placed in prisons to be potentially cut up and sold for organs, sex slaves, products for money or killed for bartered for favors with El Salvadoran president or the businesses who own the concentration camp prisons. We do not know what

¹¹ <https://www.bbc.com/news/articles/c4g8yj2n33yo>

¹² <https://www.npr.org/2025/04/16/nx-s1-5366178/trump-deport-jail-u-s-citizens-homegrown-el-salvador>

goes on in dungeons. Defendants tell us nothing. We do know China kills detainees and cuts up their organs for sale. So, it may happen here. Defendants say nothing.¹³

The ct must in the interest of justice consider the arguments against immunity, at least as applied to this case, to allow for criminal contempt and to safeguard the life and liberties of Plaintiffs, and all of humanity.

“Congress, the Executive, and the Judiciary all have a duty to support and defend the Constitution.” *Salazar v. Buono*, 559 U.S. 700 “There is no ‘de minimis’ defense to a First Amendment violation.” *Doe v. Indian River Sch. Dist.*, 653 F.3d 256, 259. “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Mullin v. Sussex County*, 861 F. Supp. 2d 411, 415.

Plaintiffs and other petitioners will continue to suffer government threats, evasion and obstructions to their 1st Am rights to petition to safeguard life and liberties if a brave ct does not uphold the Constitutional limits from government overreach in this case.

Plaintiffs and the people are deprived of the 1st Am access to the courts and any opportunity to be heard at all in accord with the 5th Am. when they are rounded up, kidnapped and in threat of being deported and imprisoned unjustly where mistakes are rewarded for profit.

The judge made doctrine created in *Nixon* was abused by Trump and will be continually abused if not restrained. When the ct errs, it cannot be corrected unless someone petitions on amicus or otherwise. When all other Petitioners are threatened and prevented from presenting this issue because they are in fear of reprisal for disagreeing with the court, I am uniquely positioned to aid the ct to correct errors or at least distinguish them as applied.

¹³ <https://www.nbcnews.com/news/world/china-forcefully-harvests-organs-detainees-tribunal-concludes-n1018646>

C. Trump and Defendants violation of USSC Order and this Court's 3/16/2025 and 4/16/2025 are so egregious that immunity should be removed as applied. President Trump is in need of correction and guidance to restrain him within the purview of Constitutional limits to prevent usurping Art III authority.

Defendants violated a USSC order,¹⁴ and this DC District Court's March 15, 2025 and April 16, 2025 orders in bad faith by detaining and shipping off people to foreign prisons without any opportunity to defend themselves for apparent bartered for favors in exchange for prison profit likened to the Third Circuit case where two PA District ct Judges wrongly imprisoned black children for prison profit. The PA Federal judges were criminally and civilly prosecuted for sending innocent little black children to prison where they were tied to the prison profit as motive.¹⁵ If an equal branch may face criminal prosecution, so, too should an equal co-equal-branches' members President Trump and Defendants, at least with regards to criminal contempt which is an issue of first impression.

Is *Trump* above the same check that members of the coequal branch the courts are. No, I should think not in contravention of the 5th Amendment Equal Protections component as applied to this exceptional case.

Even more egregious Defendants appeared to retaliate against Judge Boesberg to evade review or correction under the April 16, 2025 order by immediately seeking warrants dated April

¹⁴ See USSC Order on Application to Vacate Injunction Entered by the United States District Court for the District of Maryland, *Noem v. Abrego Garcia*, No. 24A949 (U.S. Apr. 10, 2025) (ordering unanimously that the Government must “‘facilitate’ plaintiff Abrego Garcia’s release from custody in El Salvador and ensure that his case is handled as it would have been had he not been improperly sent to El Salvador”).

https://www.supremecourt.gov/opinions/24pdf/24a931_2c83.pdf

¹⁵ See, *US v Ciavarella*, 716 F.3d 705, No. 11-3277, and *In Re Ciavarella*, Jr 108 A.3d 983, <https://www.washingtonpost.com/politics/2025/04/18/trump-presidency-news-tariffs-deportations/>

16, 2025 to kidnap people and ship them off to prison camps for bartered for foreign and private prison profit favor, violating the First Amendment right to petition in accord with due process under the 5th Amendment, any opportunity to be heard fairly, without threats, before deprivation of life and liberty by government threat and force may take place, by kidnapping people and throwing them on airplanes to be deported to foreign prisons for bartered for foreign or business favor in exchange for prison profit likened to the PA case.

The Courts do not guide the misguided defendants or Trump by granting them immunity from suit by recent judicial doctrines stemming from *Nixon* and more recently in USSC No 939. By experience we learned Trump abuses and tests and misuses such judicial grant. Thus, the ct should and must remove or limit immunity to allow criminal contempt proceedings not to destroy Trump but to restrain him from lawlessness by deeming himself to be the law supplanting Art III authority as he did in EO 14215: *Ensuring Accountability for All Agencies* issued on or about February 18, 2025. ¹⁶

EO 14215 states only the “President and the AG shall provide authoritative interpretations of the law for the executive branch.” Art II does not expressly state that the president or any other person in the executive branch has the power to interpret laws. The article states that the president is required to “take care that the laws be faithfully executed.”

Jurisdiction to interpret laws and determine constitutionality belongs to the judicial branch under Art III. The framers of the Constitution designed the separation of duties to prevent any single branch of government from becoming too powerful, not to grant the President

¹⁶ <https://www.whitehouse.gov/presidential-actions/2025/02/ensuring-accountability-for-all-agencies/>

unfettered discretion unrestrained, unchecked and unbalance by the people and public's check of the petition by the rule of law in Art III courts.

Immunity should not be extended to civil or criminal contempt proceedings in this case of first impression which is distinguished from past application of immunity. The ct must limit Congress and the President within the purview of the Constitutional limits so as to preserve Art III authority and the rights of the parties.

D. The Court should use declaratory or equitable relief by stating the outlines of the Constitutional limits of Official Presidential and congressional authority to preserve the Art III function and Constitutional rights of the people from unfair infringements, not fines or imprisonments as to invite escalating attacks by Art I and II branches where Art I and II members will continue to misbehave if not restrained by an opinion outlining constitutional limits of official authority to protect judges and Art III authority

On 4/16/25, this ct ordered a finding of probable cause for contempt. Trump appealed it that day, and the US ct of appeals stayed contempt proceedings.

Should contempt proceedings reconvene, it is more prudent to correct President Trump by limiting his power to preserve Art III authority and the people and public's right to petition without a President or Congress people's threats against attorneys or judges with the intent to commandeer outcomes unfairly than to fine or imprison him, or allow immunity to permit him to be above the law in this case of first impression.¹⁷ US Am I and V. Trump and congress are likely to become defensive and increase attacks against the judiciary and potential petitioners by threat of fines or imprisonments instead of using the case to guide the misguided Art I and II members to uphold the fair right to petition before an impartial not threatened forum and Art III function.

¹⁷ *Clinton v. Jones*, 520 U.S. 681 (1997) (“Doctrine of separation of powers does not require federal courts to stay all private actions against President of the United States until he leaves office. U.S.C.A. Const. Art. 3, § 1 et seq.”)

The ct may be tempted to use executive authority through the Marshalls against the President too given he appears to seek to usurp the court's authority by fabricating invasions or threats to gain more bartered for favors by foreign prison profit or otherwise to serve himself at the expense of the country. He passed two additional executive orders on January 20, 2025, EO 14159: *Protecting the American People Against Invasion*¹⁸ and EO 14161, *Protecting the United States from Foreign Terrorists and Other National Security and Public Safety Threats*¹⁹. Yet, I argue the best way to resolve difficult issues is civilly through the petition, at least with regards to this case of first impression where a President acts in contempt and in apparent violation of due process by attacking the judge.

E Presidential Immunity violates Equal Protections and eliminates the government's and the people's Constitutionally vested legal check the petition in accord with Due Process

This ct is not likely to overturn the USSC or its own precedent. Nevertheless, I preserve it for the record for USSC appeal. I believe the USSC is in danger, and the way to protect it is by applying the rule of law to restrain even the President and Congress to safeguard the lives and liberty of government and private peoples who are not below the law by his attempt to eliminate the law, and Art III authority as the ct did on Easter weekend, 4/19/2025. *Garcia v Noem*, 604 U. S. ____ (2025)

The right to petition is the only individual liberty which protects all other rights from infringement. When claimants are deprived of that right by President Trump's threats, Congressional interference, immunity or other disparate government restraints especially on viewpoint of speech contained in petitions, injustice occurs and the rule of law is degraded. The rule of law is what maintains and sustains these United States. The rule of law is degraded by

¹⁸ <https://www.govinfo.gov/content/pkg/FR-2025-01-29/pdf/2025-02006.pdf>

¹⁹ <https://www.govinfo.gov/content/pkg/FR-2025-01-30/pdf/2025-02009.pdf>

the Cts' partiality towards the President, Congress itself or the government as a whole to the extent it sacrifices the lives and liberties of the people, including the First Am right to petition, Due Process and Equal Protections.

When the Cts get it wrong, the right to petition may be used again to correct, to preserve, not destroy the Cts. Injustice is guaranteed when petitions are denied by the whims of the ct even the USSC by unjustly finding President is above the law as the law.²⁰ There really is a scheme to overthrow the government. USSC recently errantly removed the authority of the AGs to protect the entire government. By removing those with power to enforce the rule of law petitioners, including their advocates US AGs and special counsel's authority access to the courts, USSC removes its own authority and the rule of law that protects the people and the government.

On 7/1/24, USSC held *inter alias* the Pres. is "absolutely immune" from criminal prosecution for conduct in his official capacity in violation of Equal Protections by affording one-man, the President, unchecked deference.²¹ USSC ruled other conduct is presumed

²⁰ In recent cases USSC reduced the power of state and US Attorney Generals from prosecuting gov officials under 18 USC Sections 201 and 666. *In Kelly v Trump* I cited these very two statutes as a tool AG's may use to prevent the overthrow. June 26, 2024, the U.S. Supreme Court held 6-3 in *Snyder v. United States* that a federal statute, 18 U.S.C. § 666(a)(1)(B), does not criminalize "gratuities" to state and local officials

²¹ USSC also erred in *Nixon v. Fitzgerald*, 457 U.S. 731, 755-56 (1982)("In view of special nature of president of the United States's constitutional office and functions, president has absolute immunity from damages liability for acts within "outer perimeter" of his official responsibility."). The Court was wrong at *Id.* At 56-57 ("rule of absolute immunity for the President will not leave the Nation without sufficient protection against misconduct on the part of the Chief Executive.³⁸ There remains the constitutional remedy of impeachment.³⁹ In addition, there are formal and informal checks on Presidential action that do not apply with equal force to other executive officials. The President is subjected to constant scrutiny by the press. Vigilant oversight by Congress also may serve to deter Presidential abuses of office, as well as to make credible the threat of impeachment.⁴⁰ Other incentives to avoid misconduct may include a desire to earn reelection, the need to maintain prestige as an element of Presidential influence, and a President's traditional concern for his historical stature." USSC was further wrong at *Id.* at

immune.²² USSC further held Trump’s powers stem from the Constitution or an act from Congress, while failing to note the President is limited by both the Constitution and acts of Congress, especially criminal laws drafted to protect fundamental rights of the people the 1st Amendment right to petition and fair opportunity to be heard before violation of Constitutional rights and other liberties, not limited to a fair proceeding, freedom from being kidnapped and imprisoned in concentration campos without any opportunity to hear charges, or prepare and present defense, and the right to vote to discern who is the President as a matter of law, not as a matter of mob lawless reign or threat of violence.

USSC granted what is not the Ct’s to give the removal of Constitutional checks that balance a President’s authority within the purview of Constitutional limits. President is

757. (“The existence of alternative remedies and deterrents establishes that absolute immunity will not place the President “above the law.”⁴¹ For the President, as for judges and prosecutors, **absolute immunity merely precludes a particular private remedy for alleged misconduct in order to advance compelling public ends.**”). DC court is wrong in *Blassingame v. Trump*, 87 F.4th 1 (D.C. Cir. 2023)(“President's actions do not fall beyond outer perimeter of official responsibility merely because they are unlawful or taken for forbidden purpose; rather, President's official immunity insulates all of his official actions from civil damages liability, regardless of their legality or his motives.”). 2nd Cir. court is also wrong in *Carroll v. Trump*, 88 F.4th 418, 422 (2d Cir. 2023)(“Presidential immunity is a defense that stems from “the President's unique office, rooted in the constitutional tradition of the separation of powers and supported by our history,” and entitles the President to “absolute ... immunity from damages liability for acts within the outer perimeter of his official responsibilities.”) Immunity is unconstitutional removing Const checks on an unbalanced branch.

²² But see, *Trump v. Vance*, 591 U.S. 786, (2020) (“In contrast to a king, who is born to power and can “do no wrong,” the President of the United States is “of the people” and subject to the law.”) *Marbury v Madison*, 5 US 137 (1803) (“The very essence of civil liberty certainly consists in the right of every individual to claim the protection of the laws, whenever he receives an injury. One of the first duties of government is to afford that protection. In Great Britain the king himself is sued in the respectful form of a petition, and he never fails to comply with the judgment of his court. In the 3d vol. of his Commentaries, p. 23. Blackstone states two cases in which a remedy is afforded by mere operation of law. In all other cases," he says, "it is a general and indisputable rule, that where there is a legal right, there is also a legal remedy by suit, or action at law, whenever that right is invaded.”)

unconstitutionally given a sword to execute the law and a shield to defeat Constitutional challenges brought by petitioners or the ct and the court's check upon the President for violation of criminal laws that appear to violate the peoples and the Plaintiffs fundamental rights and others safeguards, the AG's check to safeguard victims of a President's criminal or even civil or official violations of Constitutional liberties, the AG's check to prosecute without bias against the citizens and favoritism towards the government. Specifically, the President and Congress vitiate the right to petition to defend life and liberty without foreclosure in a fair forum not threatened forum, with persecution incited by a Pres. Trump, the defendants or congress in this most heinous act of violence against humanity against Plaintiffs, the courts, the people and their country here in this case.

The shield which limits the President's authority is meant to safeguard the people, not to make one person above the law in violation of 5th and 14th Amendments Equal protection. The USSC erred in *Nixon* and in Trump Number 939. USSC has made Trump not only above a king but above God, by teaching the world he is his own judge on alleged official conduct unrestrained by the law to protect other people's Constitutional legal fundamental rights or authority, including other individuals besides the President the AG are charged to protect or defend and the government officials including judges.²³

²³ *In re Murchison*, 349 U.S. 133, (1955) ("No man can be a judge in his own case, and no man is permitted to try cases where he has an interest in the outcome."); https://en.wikipedia.org/wiki/Nemo_iudex_in_causa_sua "Nemo iudex in causa sua (also written as nemo [est] iudex in sua causa, in propria causa, in re sua or in parte sua) is a Latin legal authority that translates as "no one is judge in their own case". Originating from Roman law, it was crystallized into a phrase by Edward Coke in the 17th century and is now widely regarded as a fundamental tenet of natural justice and constitutionalism. Vermeule 2012, p. 386. (Other Cit omitted Wickepedia) "It states that no one can judge a case in which they have an interest. In some jurisdictions, the principle is strictly enforced to avoid any appearance of bias, even when there is none: as Lord Chief Justice Hewart laid down in *Rex v. Sussex Justices*, "Justice must not only be done, but must also be seen to be done"" Id. *R v Sussex Justices*, ex

It is for the ct to consider whether the President violates DP, AEA, or treason, high crimes and misdemeanors, not the one alleged to commit crimes not limited to contempt, nor is it for an unfair, bought and bartered for, unfair biased horse and pony political forum congress to say what the rule of law is as applied to Trump or its congressional members, causing the people, and the public to be continuously deprived of the right to petition fairly in accord with DP or other Constitutional rights²⁴ I disagree with *Trump v. Norma Anderson*, where USSC ct held it doesn't matter if states found Trump committed treason and high crimes, they must keep him on the ballots and Trump is above the impartial rule of law and the provisions under Section 3 of the 14th Am. USSC errantly made Trump free to entice congressmen to prevent impeachment for crimes and treasons through encouraging him to rule by temptations, lusts, by helping agendas in a horse and pony forum congress. Trump remains unrestrained by the just rule of law by the false

parte *McCarthy*, [1924] 1 KB 256, [1923] All ER 233, Datar, Arvind (18 April 2020). "The origins of "Justice must be seen to be done"". *Bar and Bench - Indian Legal news*. Retrieved 11 September 2023.

See, Isaiah 14 to see how the court has made a Pres like the devil to be his own Judge and God, reflecting the image of lawlessness leading to hell if unrestrained by the just rule of law by the courts or written in the hearts of men in the form of love *per Jeremiah* 31. *See, Sirach* 8:14 ("Contend not at law with a judge, for he will settle it according to his whim." causing lawless lusts and great injustice). Allowing Pres to be his own judge grants partiality to self not the impartial application of the constitution to the rule of law to protect the lives and liberty of all, not merely of one person with absolute discretion and a license to commit crime.

²⁴ *Williams v. Pennsylvania*, 579 U.S. 1, (2016) ("Due process guarantees an absence of actual bias on the part of a judge." U.S.C.A. Const.Amend. 14.); *Id* at 8–9, (2016) *Citing Murchison*, 349 U.S., at 136–137, ("This objective risk of bias is reflected in the due process maxim that "no man can *9 be a judge in his own case and no man is permitted to try cases where he has an interest **1906 in the outcome." *Id.*, at 136, 75 S.Ct. 623.); *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, (2009) ("In deciding whether probability of actual bias on part of judge is too high to be constitutionally tolerable, court's inquiry is objective one, that asks not whether judge is actually, subjectively biased, but whether average judge in judge's position is likely to be neutral, or whether there is unconstitutional potential for bias.") *Id.* ("There is serious risk of actual bias, based on objective and reasonable perceptions, when person with personal stake in particular case had significant and disproportionate influence in placing judge on case by raising funds or by directing judge's election campaign when case was pending or imminent.")

assertion of the USSC that immunity is the law, meaning like the devil in the legal book the Bible at Isaiah chapter 14, the President is lawless unrestrained by anyone in his official conduct unlimited by other preempting Constitutional provisions unless the courts choose to apply the Constitution as law to restrain him.²⁵

While the ct has the power of saying what the rule of law is, petitioners have the Constitutional legal authority under US Am I, V or IX in an Art III case or Controversy to argue and persuade the ct as to what the Constitution as rule of law is, especially when the ct is mistaken, and where its decision was based on protecting its personal interest from attacks. These rights should not be infringed upon by the government through Art I and II threats to maintain them pressuring USSC's errant decisions or by government attacks against petitioners, witnesses, judges or their family to affect the outcome in cases.

When the ct gets it wrong, it may be corrected through the petition. In order to uphold the fair administration of justice the ct must allow petitions even against the ct to correct errors and mistakes and to preserve the rule of law and equal Protections for all not some, including Trump

²⁵ *Federalist 10* “No man is allowed to be a judge in his own cause, because his interest would certainly bias his judgment, and, not improbably, corrupt his integrity. With equal, nay with greater reason, a body of men are unfit to be both judges and parties at the same time; yet what are many of the most important acts of legislation, but so many judicial determinations, not indeed concerning the rights of single persons, but concerning the **rights of large bodies of citizens?** And what are the different classes of legislators but advocates and parties to the causes which they determine? Is a law proposed concerning private debts? It is a question to which the creditors are parties on one side and the debtors on the other. Justice ought to hold the balance between them.” When courts balance Constitutional authority and restraints it must uphold the express purpose this Country was founded to protect life and liberty not to sacrifice it for the mark of the beast, lawless lusts leading to hell including avoidance of costs, material gain, convenience, comforts, positions, power and other vain desires if not restrained or repented of. *See, Federalist letter 78*, Also *See, Federalist 80* “No man ought certainly to be a judge in his own cause, or in any cause in respect to which he has the least interest or bias. This principle has no inconsiderable weight in designating the federal courts as the proper tribunals for the determination of controversies between different States and their citizens.”)

who is rendered above the law by immunity. Wrongs cannot be righted when petitions are obstructed and fair opportunity to be heard are denied. Injustice is the law when the USSC says immunity or denial of 1st Amendment rights including the petition is now the law. The rule of law is degraded when the rt to pet fairly are denied. US Amend I, V.

F. Article I and II members' official power should be restrained to prevent threats towards judges, petitioner's, witnesses or their families to influence the outcome of cases unfairly in violation of the people and public's 1st Amendment right to petition fairly in accord with 5th Amendment due process and equal protections not before threatened federal courts, and also in violation of separation of usurping Article III authority

In this case, Trump, and executive officers such as Vice President Vance and Congressmen or others exceeded their official Art I and II powers by violating the rights of petitioners to petition fairly in federal court, in this case, in accord with due process ("DP") where Art I and II members threatened the trial ct Judge, the Honorable Chief Judge James Boesberg, ("Boesberg") by using official government authority to malign or otherwise chill the judiciaries' powers, threatening to eliminate the specific ct and its judge, Chief Judge Boesberg by defunding it, drafting articles of impeachment, or drafting proposed laws with the intent to usurp Art III power to force outcomes in current lawsuits, in this case, and to prevent future cases, removing judicial authority unconstitutionally with implied threats of retaliation against appellate and the USSC members should they not conform to the rulings Art I and II members command infringing the plaintiffs right to a fair and impartial forum to petition.

Accordingly the USSC's order may be null and void in violation of Due Process in terms of venue, and it is inapplicable to the contempt proceeding.²⁶ Even the USSC's forum was not a

²⁶ See *Swirlate IP LLC v. Quantela, Inc.*, 1:22-cv-00235, (D. Del.). Chief Judge Honorable Connelly permitted to bring contempt proceedings, even by non-party after case closed per Federal Appellate Court, which may be precedent should specific Article I and II members not a party extra judicially threaten the parties, the counsel or judges or their families with intent to affect the outcome of cases. See, *In re Nimitz Technologies LLC, Appeal No. 23-103* (Fed. Cir.).

fair but threatened forum in contravention of the 5th Amendment right to Due Process in this case by violations of Art I and Art II members including President Trump's express or implied threats towards trial ct Judge Boesberg and the innuendo of threats towards the appellate ct and the USSC members.²⁷

Allowing this trial ct to entertain this issue of first impression to limit the scope of the President's power to the purview of the Constitutional limits to safeguard the right of public and private peoples to freely exercise their legal power to petition fairly in accord with 5th Amendment due process without threats and retaliation against AGs or law firms like Paul Weiss by executive order and Skadden or federal judges is imperative to protect the function of the courts and the rights of the people to due process before violation of their rights, even a fair opportunity to be heard in an impartial forum in this present case. Due Process applies here too.

I seek to aid the ct in removing the unfairness in this court, the appellate ct and especially the USSC under the unique situation where a US President and Congressmen threaten Judges and lawyers or attorneys in cases, as they did in this case, with the intent to command the outcomes or retaliate against judges and petitioners to control other courts outcomes in the future cases, by amicus even if limited to the contempt proceeding or venue issue.

Sinclair v. United States, 279 U.S. 263, 295 (1929), held, "It may be conceded that Congress is without authority to compel disclosure for the purpose of aiding the prosecution of pending suits." The ct should extend this rational to prevent Congress and President Trump from

Ordered. The case was appealed together with related cases. See, *In re Nimitz Technologies LLC*, Appeal No. 23-103 (Fed. Cir.); 2022 WL 17494845 (Not reported)

²⁷ See, *Borough of Duryea v. Guarnieri*, 564 U.S. 379, 387 (2011) ("This Court's precedents confirm that the Petition Clause protects the right of individuals to appeal to courts and other forums established by the government for resolution of legal disputes. '[T]he right of access to courts for redress of wrongs is an aspect of the First Amendment right to petition the government.'")

continuing to use their official power under Art I and II impermissibly to usurp Art III authority and eliminate the people's rights to petition fairly by threatening parties, courts or their counsel including in contempt proceedings.

Congress's express and implied Art I authority must not be permitted to continuously be misused to commandeer outcomes in cases by threatening judges, parties or their counsel or their family with the intent of supplanting Art III power with their own judgement as to what the rule of law is.²⁸ Congress need not be a party to restrain unconstitutional application of laws as applied or per se. They need not be a party to restrain their other official conduct under the speech and debate clause and other clauses.

Congress drafted articles of impeachment against Judge Boesberg to force the outcome in this case unfairly by the attached H. RES. 229. Exhibit 9. Congress Presented the attached law, H.R.1526 - 119th Congress (2025-2026):

NORRA of 2025 to eliminate fundamental rights of claimants for equitable stays including claimants in this case in contravention of the 5th Am due process before vitiation of rights and the Courts Art III authority to grant them fairly, while hypocritically asking for a stay on Friday, 4/18/25 by appealing issues not ripe to evade a record below for a hearing the next business day, Monday, 4/20/25.²⁹ This is cheating to win by unfairly depriving plaintiffs of any opportunity at all to be heard before government vitiation of rights unfairly in contravention of Due Process.

Speaker of the House Johnson threatened to eliminate this DC District ct and Honorable Chief Judge Boesberg ("Boesberg") specifically by defunding it to force or otherwise control the

²⁸ E.g. Article I, Section 6, Speech and Debate Clause, Article 1 Section 8, coining power, *Trump v. Mazars USA, LLP*, 591 US ____ (2020), (Implied power to investigate)

²⁹ <https://www.congress.gov/bill/119th-congress/house-bill/1161>

outcomes of this DC District ct and the appellate ct case in violation of Equal Protections component of the 5th Amendment (“EP”) and 1st Amendment viewpoint of speech of plaintiffs by unfairly usurping Art III authority by insidious unconstitutional threats.³⁰

Congress does not have an implied or express power to threaten the courts by disparately defunding judges it disagrees with in contravention of equal protections under the 5th Am and separation of powers to force Art III judgements. Nor does congress have the power to adjudicate “monetary fines” for contempt and investigatory proceedings with the intent to force outcomes in Art III cases although Congress alludes to this power through attorney Todd Garvey in pages 10-11 of *CRS Congress’s Contempt Power and the Enforcement of Congressional Subpoenas: Law, History, Practice and Procedure*, dated May 12, 2017.

Congress through its attorney Todd Garvey even conceded this USSC may limit its investigatory power to protect the superseding 1st and 5th Amendment rights to petition coupled with DP in cases and controversies, at least in criminal cases, so as not to threaten and commandeer the Courts. Id.

Pence maligned the court, and abused his position to exert social force to chill Art III authority by stating it had no Art III authority to restrain or place any check to balance the President.³¹

President Donald Trump had earlier called Boasberg a “Radical Left Lunatic Judge” in a social media post and demanded his impeachment.³² That is childish, dangerous and not okay

³⁰ Reuters, US House Speaker Johnson says Congress can 'eliminate' district courts, By David Morgan and Nate Raymond, March 25, 2025, <https://www.reuters.com/world/us/us-house-speaker-johnson-says-congress-can-eliminate-district-courts-2025-03-25/>

³¹ <https://www.theguardian.com/us-news/2025/feb/10/jd-vance-judges-trump>

³² <https://www.usnews.com/news/u-s-news-decision-points/articles/2025-03-20/trump-wages-war-on-judge-boasberg>

and by circumstantial evidence and common sense I assume Trump, Congress and others abuse their government position to **force outcomes in cases by threatening** district ct judges and creating the fear of threats of an already attacked ct system, federal judges, appellate judges, including members of the USSCs.

Congress's powers must be limited not limitless. So, too the Presidents power is limited not limitless.³³ I ask this ct to limit Art I and II authority to prevent interference and threats towards judges, their wives, their kids or themselves, plaintiffs, their counsel, attorney generals, special counsel, other petitioners and witnesses by Congress's improper use of investigatory or impeachment powers to commandeer the ct in violation of separation of Art I and Art III powers where congress seeks to act in place of Art III judges to force rulings by threat in violation of my 1st and 5th Am rights as applied.

Art I and II members' abuse of the color of official power to threaten federal judges and Judge Boesberg and the innuendo of threats to the appellate courts in this case violate the right to a fair and impartial forum as applied, and is worthy of consideration in contempt proceedings to preserve the rule of law in a fair not threatened forum. By allowing Trump, Defendants and congress to continue to use the color of government authority to threaten or remove those with power to enforce the rule of law petitioners, including petitioners, Plaintiffs, US Attorney generals', special counsel or even special prosecutors by threat of reprisal against perceived dissidents of Trump, the courts remove its own authority and the rule of law. I am mostly concerned should the ct appoint a special prosecutor.³⁴

³³ I do not even like express power of impeachment which may not be an issue here. Impeachments do not work. John Jay admitted so, despite supporting them previously. England eliminated impeachments because they do not work.

³⁴ *Morrison v. Olson*, 487 U.S. 654 (1988), was a Supreme Court of the United States decision that determined the Independent Counsel Act was constitutional

Congress members Jim Jordan and Loudermilk and Texas AG Paxton colluded to threaten appointed AG special prosecutor Jack Smith to affect the outcome of a case against Trump to threaten to chill his 1st Am right to petition fairly by requiring self-incrimination in contravention of the 5th Amendment by compelled testimony and violation of attorney work product per the attached letters, and article. It's not ok for Art I and II members to bully attorney generals to violate attorney generals and independent counsel's 1st Am right to petition fairly without gov threats, which created calls to give Jack Smith the death penalty per the attached article. I foresee an appointed prosecutor may also face similar threats unless case law protects petitioners and Courts.

I ask this ct to please limit Art I and II official power to protect the 1st Amendment Constitutionally vested legal power to petition fairly in accord with 5th Amendment due process by restraining government officials or their agents from threatening a judge, attorneys, the parties, their counsel, and even attorney generals during litigation to influence the outcome of cases unfairly by usurping the Judiciaries' Art III power, or retaliating against them after cases conclude to chill the duties of appellate and other district ct judges to commandeer and control outcomes of lawsuits unfairly.

The right to a fair not partial forum supersedes convenience in terms of venue when prejudice is so great and the harm so severe. Especially when there is evidence of bad faith intent to manufacture crises to evade the law's application to the other two branches unfairly.

Trump's hands are unclean. He creates a constitutional confrontation by evading the courts and obstructing petitioners' access to the courts by threats and retaliation. Trump appeals so quickly, it deprives the parties of briefing out decisions, leaving the USSC a skeletal record to review on the issues it opines on unfairly by Defendants intentional burden.

Trump disrespects the Courts and evades judgment in bad faith by manipulating the courts while citing case law that commands the Courts' respect his lawless decisions in Appellate Emergency Motion Brief ("Brief") In Brief, Trump hypocritically asserts "[O]ccasion[s] for constitutional confrontation between the two branches should be avoided whenever possible." *Cheney v. U.S. Dist. Ct. for D.C.*, 542 U.S. 367, 389-90 (2004).

Trump does not avoid constitutional confrontation against co-equal branch judiciary. Instead, Trump in collusion with members of the legislative branch cause constitutional confrontations. EO 14215 supplants the Court's authority to say what the law is binding attorney generals, the government and the people unless the Court's authority is overturned by a persuasive petition in a case and controversy.

Trump threatens judges and chills dissenting public and private petitioners based on viewpoint of speech. Congress colludes in threatening judges or their families regardless of party, intimidating parties, potential petitioners, judges or witnesses to affect the outcome of cases under the color of official Art I and II authority especially this DC District ct and the forum ct judge with innuendo of threats towards the appellate and USSC ct justices.

Art I and II authority must be limited to safeguard the Art III authority from such abuse, and such limits should be made the law in this case at District ct or USSC. Separation of powers should not mean removal of all checks the judiciary has on the two other branches leaving them unbalanced. Trump at appeal accuses the ct of breaking the law by placing a check upon Trump by defining the scope of the Constitutional limits of his official authority. That argument must be rejected to preserve Art III authority.

This case is distinguishable from any other. The ct is not confined to past case law for this issue of first impression no matter how much the Defendants try to corner the ct by threats

and compelled coercive results even inciting social backlash impermissibly in bad faith to affect the outcome in this case or others. Trump is out of line with the official Art I authority, and needs the ct to draw the line to guide two misguided branches by outlining the Constitutional limits explicitly to prevent a very schemed dissolution only Art III members have the power to stop with the help of petitioners.

There is evidence the alleged invasion is fabricated for Trump to evade the law and more seriously by the possibility of internal threats of an insurrection where the President may be acting in a manner as to be deemed an internal enemy of his own country and people ignorantly, indifferently or intentional, doesn't matter. What matters is the courts must restrain and guide misguided members of the other two branches when they give into temptation to exceed constitutional authority.

The executive branch, like Congress members, is biased towards its own interest, controlled by those who show favor blinded not free to lay down desires to do what is right to preserve this United States from internal threats. So, the ct should and must guide the two other misguided branches to preserve the country.

Trump further misleads the Ct on appeal at page 3 Brief; by citing a case for the assertion Trump's power is unreviewable and unchecked and unbalanced and it is the law that no one can restrain him to mislead the appellate court. The constitution supersedes any congressional authority and judge made doctrines. Neither Law makers, presidents nor judges can blot out the Supreme law of the land, even if the USSC agrees with PA Western District ct case concerning the legality of AEA. AEA is limited to the purview of Constitutional limits despite the statutory provisions seemingly to write out the superseding law. See supremacy cl.

Conclusion: Wherefore I pray this Ct grants relief it deems just.