24-6673 ORIGINAL

No.

IN THE SUPREME COURT OF THE UNITED STATES

ISRAEL ROMERO, Petitioner

v.

META PLATFORMS, INC., ET AL.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEAL FOR THE FOURTH CIRCUIT

PETITION FOR A WRIT OF CERTIORARI

ISRAEL ROMERO – *Pro Se* Petitioner
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QUESTION PRESENTED

In Universal Health Services, Inc. v. United States, 579 U.S. 176 (2016), Justice Thomas stated that misleading representations are half-truths, and that are material having a natural tendency to influence, or be capable of influencing [the judge]. In United States of America v. Jeffrey Spanier, No. 16cr1545-BEN, 637 Fed. App'x. 998, 1000-01 (9th Cir. Jan. 21, 2016), Hon. Roger T. Benitez, United States District Judge wrote that, "Half the Truth is often a great Lie." In Petitioner's case, Respondents started by falsely accusing the Petitioner of a criminal conviction at the NYS Court of Appeals (SCDC ECF No. 33 at 3 footnote 5 cont.). Official certification from that Court shows "NO RECORD FOUND" meaning that Plaintiff has no criminal record in the State of New York. Defendants also wrote to the district court –in the answer to the complaint- regarding Plaintiff as a "*lawyer from Honduras.*" (SCDC ECF No. 33 at 2-3 footnote 5. Documents on that case start saying: "Israel Romero, a lawyer from Honduras") In addition –in the answer or reply to Plaintiff's Motion for Default Judgment (SCDC ECF No. 31) and for Entry of Default (ECF No. 32), Respondents wrote a disparaging false statement that Plaintiff [Petitioner] was claiming they fail to verify the answer and motion (SCDC ECF Nos. 25 and 25-1) because did not sign those documents "under the *pains* and *penalties* of perjury." The Magistrate Judge –influenced by Respondents, filed a Report & Recommendation (SCDC ECF No. 53) filled with half-truths, inconsistencies, and statements not supported by the record, repeating those misleading statements. The District Judge in the final decision and Order (SCDC ECF No. 65) wrote a total of sixteen (16) inflammatory and disparaging comments: half-truths, blatant lies, "camouflaging bias," other multiple instances of bias or the appearance of bias, misstatements, and statements not supported by the record that warrants review by this Court. In addition, the Court of Appeals for the Fourth Circuit (USCA4) failed to follow its own standard that, "On review, we must accept as true the facts as alleged in the complaint." Langford v. Joyner, 62 F.4th 122, 123 (4th Cir. 2023). Also failed to apply its own theory and standard set on Bivens that, "Bivens claims before us are for the denial of procedural due process and equal protection." Annappareddy v. Pascale, 996 F.3d 120, 132 (4th Cir. (2021). In Woods v. Greensboro, 855 F.3d 639 (4th Cir. 2017), USCA4 stated that, "modern-day discrimination is more likely caused by 'nuanced decisions' and implied bias." 4th Cir. states that when a court renders a decision, the court must "provide an adequate explanation for the [final order]," (U.S. v. Jackson, Case No. 23-4580 – 4th Cir. Jan. 31, 2025); but in Petitioner's case 4th Cir. did not explain at all. However, the Appeals Court itself made three (3) instances that can be considered biased in violation of Petitioner's rights to due process and equal protection of the laws, bringing a total of nineteen (19) instances considered bias, error that warrants review by this Court. The question presented is:

Whether the Due Process Clause of the Fourteen Amendment requires recusal of a judge when there are multiple instances of bias, including half-truths, lies, misstatements, and statements not supported by the record, and whether the failure of the Court of Appeals to provide an explanation for affirming such a decision is error that warrants review by the Supreme Court.

PARTIES TO THE PROCEEDING

PETITIONER: Israel Romero (Appellant below)
Pro Se
P.O. Box 1483
Taylors, SC 29687

RESPONDENTS: (Appellees below) are
Meta Platforms, Inc., a provider of social media platforms
1 Hacker Way
Menlo Park, San Mateo County
California, 94025

Mark Zuckerberg
CEO and Founder of Meta Platforms, Inc.
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Menlo Park, San Mateo County
California 94025

Respondents represented by: Katherine E. Munyan
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Attorneys for Meta Platforms, Inc. and
Mark Zuckerberg

RELATED PROCEEDINGS

United States Court of Appeals (4th Cir.):

Israel Romero v. Meta Platforms, Inc, Mark Zuckerberg, No. 24-1729
(Order Filed on Dec. 23, 2024) (App'x A)
(Mandate filed on January 4, 2025) (App'x A)

United States District Court, District of South Carolina

Israel Romero v. Meta Platforms, Inc., Mark Zuckerberg, No. 7:23-cv-3306-TMC
(Order Filed on July 19, 2024) (App'x B)

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IN THE SUPREME COURT OF THE UNITED STATES

No.

Israel Romero, Petitioner
v.

Meta Platforms, Inc., and Mark Zuckerberg, Respondents.

ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

PETITION FOR A WRIT OF CERTIORARI

Israel Romero, proceeding *Pro Se*, respectfully petitions for Writ of Certiorari to review the ORDER of the United States Court of Appeals for the Fourth Circuit.

OPINIONS BELOW

The Order of the United States Court of Appeals (App'x infra, A) is
[X] is unpublished. Filed on December 23, 2024
[X] Mandate filed on Jan. 4, 2025

The opinion of the United States District Court appears at Appendix B and it is
[X] I don't know if it is reported or unpublished

JURISDICTION

[X] For cases from federal courts:
The order of the Court of Appeals in my case was entered on December 23, 2024.

[X] No petition for rehearing was timely filed in Petitioner's case.
[X] Mandate was filed on Jan. 4, 2025.

The jurisdiction of this Court is invoked under 28 U.S.C. 1254 (1).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The pertinent constitutional and statutory provisions are reproduced in the appendix. App'x *infra*, # G

STATEMENT OF THE CASE

Enacted by United States Congress in 1940, and amended in 2022, 28 U.S. Code § 455 (2022) states that..."(a) Any justice, judge, or magistrate judge of the United States shall disqualify himself in any proceeding in which his impartiality might reasonably be questioned. (b) He shall also disqualify himself in the following circumstances: (1) Where he has a personal bias or prejudice concerning a party, or personal knowledge of disputed evidentiary facts concerning the proceeding;" In his final decision of this case, rendered on July 19, 2024 (DC ECF No. 65) Judge Timothy M. Cain included sixteen (16) instances that can be considered bias, or the appearance of bias, including inflammatory and disparaging comments, some are half-truths, lies, misstatements, and statements not supported by the record (4th Cir. No. 9 at 12-22; App'x B).

This Court has ruled that, "the Due Process Clause may sometimes demand recusal even when a judge 'has no actual bias'" Aetna Life Ins. Co. v. Lavoie, 475 U.S. 813, 825 (1986). Recusal is required when, objectively speaking, "the problem of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable." Withrow v. Larkin, 421 U.S. 35, 47 (1975; see Williams v. Pennsylvania, 579 U.S. 1 (2016) This Court also holds that "whether considering all the circumstances alleged, the risk of bias was too high to be constitutionally tolerable." Rippo v. Baker, 580 U.S. ____ (2017).

On or about 2015, Petitioner entered into a valid contract with Meta Platforms, Inc. (at that time the name was Facebook, Inc.), represented by Mark Zuckerberg as founder and CEO. (DC ECF No. 1 at 3) Respondents confirmed the existence of said contract. (DC

ECF Nos. 25, 25-1, 26, 27). On or about February 17, 2023, Petitioner made a donation to Petitioner's grandchild nine-grade elementary school students' fundraiser in benefit of the American Heart Association. (DC ECF No. 1, Exhibit B (2) Receipt issued by Facebook to Petitioner). Immediately after the donation, a pornographic picture was published following the picture of the minors. (DC ECF No. 1, Exhibit B (1) states Iga Mariana is here with Israel Romero and 75 others). Petitioner closed his Facebook account. (DC ECF No. 1, Exhibit B (3) Petitioner statement regarding the closing of his Facebook account). Petitioner filed the complaint on July 11, 2023 claiming *breach of contract* pursuant to Restatement (Second) Contracts § 235 (2) Breach of Contract, and § 347 and UCC 1-106(1) redress to the innocent party; claiming *defamation* pursuant to 28 U.S. Code § 4101 (1) Defamation; and, claiming *intentional infliction of emotional distress* (IIED) pursuant to Restatement (Second) of Torts, Section 46 (1) for extreme and outrageous conduct intentionally or recklessly causing Petitioner severe emotional distress. (DC ECF No. 1 at 4-11). On July 12, 2023, the Magistrate Judge ordered the picture of the complaint ECF No. 1 Exhibit B (1) to be redacted and sealed because "is not appropriate for public review as it appears to be pornographic". (DC ECF No. 6 at 1)

On July 19, 2024, the District Judge filed his final decision and Order stating that because Petitioner failed to established and show authority for his "legal argument under standard for dismissing the complaint and granting the Respondent's motion to dismiss is *the pains and penalties of perjury.*" (emphasis added) (DC ECF No. 65 at 9; App'x B)

On August 26, 2024, Petitioner filed his INFORMAL BRIEF (4th Cir. No. 9), arguing two issues: jurisdiction by the district court pursuant to Fed. R. Civ. P. Rule 4 in

connection to S.C. R. Civ. P. Rule 4, and other statutes and applicable case law; and violation of Petitioner constitutional XIV Amendment rights due to bias. (4th Cir. No. 9 at 1-22). In United States v. Jackson, 4th Cir. Case No. 23-4580 (4th Cir. January 31, 2025), the appeals court ruled that when a court renders a decision, "the court must provide an adequate explanation for the [final order or decision]" However, in Petitioner's case, the very same court of appeals wrote that, "We have reviewed the record and find no reversible error." No explanation at all. (4th Cir. No. 19 at 3). If the Appeals Court had reviewed the record -meaning every document filed by Petitioner and by Respondents, and every decision by the Magistrate Judge, and by the Judge, including looking at the pornographic picture that triggered this case, Petitioner can tell the Appeals Court should have ruled differently. The 4th Cir. has stated also that, "modern-day discrimination is more likely caused by 'nuanced decisions' and implied bias." Woods v. City of Greensboro, 855 F.3d 639, 652 (4th Cir. 2017). The decision of the Appeals Court (App'x A) against its own standards is plain error that warrants a review by this Court.

REASONS FOR GRANTING THE PETITION

The Appeals Court affirmed an obviously biased decision from the District Court, with showing or bias or at least a "camouflaged bias" (see Rippo v. Baker, 580 U.S. ___(2017) or the risk of bias as is detailed presented by Petitioner in his INFORMAL OPENING BRIEF (4th Cir. No. 9). Discrimination in violation of Petitioner due process and equal protection, as described by this Court in Davis v. Passman, 442 U.S. 228, 230 (1979), was presented as a warning to the District Court on 04/15/2024, Petitioner filed a COMPULSORY REPLY (DC ECF No. 60 at 5-6), and wrote, "To be preserved for the

possibility of appeal, Plaintiff [Petitioner] alleges and affirms that in this case are involved: (a) ***discrimination*** against Plaintiff by reason of age (74 yrs. old) [now 75], race (Hispanic), and national origin (Plaintiff is naturalized American citizen) born in Honduras (Dkt. No. 33; 34 at 3-4) [DC ECF No. 33] [in document #33, Respondents stated an igniting sentence: "Romero is a lawyer from Honduras" contained in a case illegally cited by Respondents that was "pardoned" by the State of South Carolina; and (b) ***retaliation*** against Plaintiff [Petitioner] for having included the issue of a leak from this Court [South Carolina District Court] in a previous Petition for a Writ of Certiorari at the Supreme Court of the United States, in a prior case." (4th Cir. No 9 at 4, 12-13) In that prior case, Petitioner also filed with SCOTUS a Petition for a Writ of Mandamus because 4th Cir. had placed that case "in abeyance" without a reason: the Appeals Court mentioned a case that had no relation to issues on Petitioner's case, and once decided showed that the decision was not related in anything to the facts and issues presented by Petitioner in his case. The lower court decision is plain error. It is meritorious that this Supreme Court reviews the decision below for the reasons as follows:

(a) The Decision Below Is Wrong Due To Bias

Instances of bias, appearance of bias, potential bias, "camouflaged bias," constitutes too high risk of bias to be constitutionally tolerable (Rippo, *supra*). This Court does not tolerate misbehavior in the form of bias by lower courts. Other Appeals Courts also do not tolerate such a behavior. In Figueroa, the Court wrote that, "When a District Court makes 'extraneous and inflammatory comments' on the [final order or decision] it cast[s] doubt on the validity of the [order]." United States v. Figueroa, 622 F.3d 739 (7th Cir.

2010). The Order filed on 7/19/24 (DC ECF No. 65 – App'x B) with plenty of half-truths, lies, misstatements, statements not supported by the record, funny sayings, extraneous and inflammatory comments, and insults to Petitioner, affirmed by the Appeals Court (App'x A), is plain error that warrants review by the Supreme Court.

1. Half-truth. In his Order filed on 07/19/24 (ECF No. 65; App'x B) the judge wrote at 3-4, "Plaintiff's [Petitioner] Facebook reflected he made a donation." This is half-truth because Petitioner wrote in addition that, "Facebook sent a receipt immediately for the amount of the donation." (DC ECF No. 1, Exhibit B (2); 4th Cir 9 at 21) The relevancy is this: the full statement proves that Defendant Facebook (Respondent Meta Platforms, Inc.) was involved in the donation transaction, and the judge was camouflaging the bias against Petitioner but protection of Respondents. Behavior and error that warrants review.

2. A lie. The judge wrote (ECF 65 at 4; App'x B), "...and reported the incident to the FBI (ECF Nos. 1 at 4; 1-1 at 8-15; 4th Cir 9 at 14)" It is a total lie. Petitioner never reported the incident [publication by Facebook of pornographic picture depicting that Petitioner was having deviated sex with Iga Mariana on February 2023 that triggered this case] to the FBI (4th Cir 14 at 2). Petitioner reported (yes) to the FBI a prior incident occurred on 8/25/2021 (DC ECF No. 1 at 11 titled ANTECEDENTS. See Exhibit C ECF No. 1) (4th Cir. No. 9 at 14). The judge gives the impression of being confused with Petitioner description of both incidents, camouflaging his bias. The judge wrote that, "district judges are not mind readers, and the principle of liberal construction does not require them to 'conjure up questions never presented to them or to construct full-blown claims from sentence fragments'" (quoting Beaudett v. City of Hampton, 775 F.2d

1274, 1277-78 (4th Circ. 1985)) (DC ECF No. 65 at 3) (4th Cir. No. 9 at 14). The District Judge, however, did not apply the standard to himself, neither did the Appeals Court, and the failure or inaction by the 4th Circuit is error that warrants review by this Court.

3. Misstatement. On p. 4 of ECF No. 65 (App'x B), the judge wrote a lengthy # 2 marginal note related to Petitioner sur-reply. The document title is COMPULSORY REPLY, triggered by the plenty of lies, half-truths and funny writings by Defendants [Respondents]. The #2 margin note results to be a misstatement: obviously the judge did not review the record because calls ECF No. 30 to be Respondents "motion has been fully briefed." Entry No. 30 does not exist: it would be both Motion for Entry of Default and Motion for Default Judgment filed by Petitioner, but the court converted the Motion for Default Judgment to be ECF No. 31, and the Motion for Entry of Default to be ECF No. 32, leaving ECF No. 30 in blank, with no documents (4th Cir 9 at 17). The judge is contradicting himself because on 11/13/2023, the District Court ordered Petitioner to "Reply to Response to Motion due by 11/28/2023." This court order appears in the official Docket inside ECF No. 35. Petitioner filed his reply the same day, and appears as ECF No. 34. Neither the court nor the Respondents objected, and the document is binding because it was not stroke from the record. ECF No. 33, Defendants [Respondents] "Reply to Response to Motion to Dismiss Response" contains several lies but one is *prima facie* defamation against Petitioner. Respondents invented a criminal case against Petitioner and cites a fictitious case number from the New York State Court of Appeals. Petitioner filed a COMPULSORY REPLY (ECF No. 34, Exhibit A; Petition for Certiorari App'x E), showing that at NYS Ct. of Appeals there is "NO RECORDS FOUND" for Israel

Romero (4th Cir. No. 9 at 3-4, 6-7) (App'x *infra* # E). Judge Cain was trying to protect the Respondents with his confusing misstatement. Respondents also –maliciously and illegally, cited a criminal case in South Carolina. In that case, Petitioner was tried and convicted with a draft of a bill. The law was passed by South Carolina Legislature six months later, which anyway did not apply to Petitioner's acts. Petitioner was charged in S.C. State Court for assisting a person in Federal Court with a license issued by the District Court of South Carolina. The State of South Carolina **PARDONED** the conviction in 2018. [4th Cir. No. 9 at 3, 6-7] (App'x *infra* # D) Respondents inciting the Magistrate Judge and the Judge, may be considered defamation *per se*, and the Order of App'x B is full of bias. S.C. §268(d)(2) SCACR, prohibits citing unpublished opinions. The Appeals Court affirmed such a decision: is error that warrants review by this Court.

4. Another half-truth. App'x B -ECF No. 65 at 5, margin note 3, reads, "On April 17, 2024, the Court adopted this recommendation and dismissed Defendant "Jane Doe" from the action. (ECF No. 61)(App'x *infra* # C) No doubt that the judge only read the *Docket* because his own order states that, "the Court *grants* plaintiff's motion to dismiss defendant Jane Doe from this action," in addition to *adopting* the Magistrate Judge R&R (ECF 61 at 3; 4th Cir. Caption of Nos. 13, 16, 19, 21) is error that warrants review.

5. On pages 6-7 of DC ECF No. 65 (App'x B), the Magistrate Judge and Judge Cain just played blind on the issue of personal jurisdiction. The judge wrote that, "The magistrate judge recommends that the Court grant Defendants' [Respondents] motion to dismiss (ECF No. 25) on the grounds that it lacks personal jurisdiction (ECF No. 53 at 14)." Respondents were served by Certified Mail Return Receipt Requested where S.C. Civ. P.

Rule 4 states that the court acquires personal jurisdiction when Defendants are served by Certified Mail-Return Receipt Requested (4th Cir. 9 at 3-5). Take notice that Respondent Zuckerberg was served twice: one at his corporate offices at 1 Hacker Way, Menlo Park, California 94025, and the second time within the forum state at the offices of his attorneys of record at 1 North Main Street, Second Floor, Greenville, South Carolina 29601, needing no minimum contacts with the forum state. (see Burnham v. Superior Court, 495 U.S. 604 (1990)). Furthermore, Facebook, Inc. has been making business in the forum state as a registered corporation under the name of Carolinas Facebook, LLC since February 3, 2012, as proven with the Certificate of Existence issued by South Carolina Secretary of State Mark Hammond. (4th Cir. No. 15, Exhibit B)(App'x *infra* # F). Hence, Petitioner had no need to show minimum contacts by Respondents with the forum state and the court has personal jurisdiction over Respondents without violating their due process rights. South Carolina Code § 33-8-102 states, ... "A director need not be a resident of this State or a shareholder of the corporation unless the articles of incorporation or by laws so prescribe." Respondent Mark Zuckerberg, is the founder and Chief Executive Officer of Meta Platforms, Inc. –parent corporation of Facebook, Inc., and is the principal director of Respondents. Hence, pursuant to S.C. Code § 33-8-102, no minimum contacts are required for the District Court to acquire personal jurisdiction over the Respondents. Therefore, the District Court has personal jurisdiction over the Respondents without violating their due process rights. Besides, Respondent Zuckerberg is not mentioned in the complaint as personally liable but only as Founder and CEO of Facebook [Meta Platforms] (DC ECF No. 1 at 1-2). Moreover, South

Carolina Code of Laws § 39-5-20 (a) (SC Unfair Trade Practices Act – SCUTPA) declares that, "any unfair and deceptive acts or practices in the conduct of any trade or commerce to be unlawful," making the directors liable for the misconduct of the corporation itself and of officers and employees. This case is based upon clear "misconduct" by rcspondcnts. Both, thc Magistratc Judgc and Judgc Cain showcd plcnty of bias, and the Court of Appeals affirming such a decision, also showed bias, and is error that warrants review by the Supreme Court.

6. A lie. Judge Cain on p. 7 of the final decision and Order (DC ECF No. 65- App'x B) wrote that a lawyer "who is not licensed in South Carolina, *did not sign* (emphasis added) the motion." Not true: she signed electronically and clearly states, "ORRICK, HERRINGTON & SUTCLIFFE LLP, Caroline K. Simons (*pro hac vice* forthcoming)...Attorneys for Defendants Mark Zuckerberg, Meta Quest Inc. and Meta Platforms, Inc." did it twicc, on DC ECF No. 25 at 2, and on DC ECF No. 25-1 at 21. (4th Cir. No. 9 at 10-11) If Caroline K. Simons had no intention to present herself as a lawyer for Respondents, her name had no reason to appear with office address, electronic addrcss, phonc numbcr and facsimilc. In our casc, it likcncd Rippo's claim to thc "camouflaging bias" theory that this Court discussed in Bracy v. Gramley, 520 U.S. 899 (1997). The Supreme Court stated that, "Under our precedents, the Due Process Clause may somctimcs dcmand rccusal cvcn whcn a judgc "ha(s) no actual bias.'" Actna Lifc Ins. Co. v. Lavoie, 475 U.S. 813, 825 (1986). But this Court demands that, "Recusal is required when, objectively speaking, 'the probability of actual bias on the part of the judgc or dccisionmakcr is too high to bc constitutionally tolcrablc.'" Withrow v. Larkin,

421 U.S. 35, 47 (1975); see Williams v. Pennsylvania, 579 U.S. 1 (2016). Again, the judge only read the Report and Recommendation by the Magistrate Judge (DC ECF No.53), and the Court of Appeals Fourth Circuit only read the Order from the District Court (DC ECF No. 65-App'x 1). Hence, both Judge Cain and the Appeals Court committed a gross showing of bias, enticed by the Magistrate Judge bias, who was incited by the Respondents. Such a chain of misbehavior warrants review by the Supreme Court.

7. Half-truth on DC ECF No. 65 at 7(App'x B). The judge makes a statement regarding personal jurisdiction but fails to mention Rule 4 of S.C. Civ. P. Rules, failing also to address that Respondent Zuckerberg was served within the state of South Carolina –the forum state- through his attorney of record Christopher B. Major after he complained (DC ECF No. 22 at 1) that Respondent Zuckerberg was not properly served or not served at all. Documents on DC ECF Nos. 17 and 57 Exhibit A, show the two instances of service of process upon Respondent Zuckerberg, the second service was executed within the forum state (4th Cir. No. 9 at 3-5), and no minimum contacts are required. The District Court did not take into account that the law in South Carolina states that a director of a corporation need not be in South Carolina to be held accountable and to be liable for misconduct of the corporation itself, of other officers and employees. (S.C. Code of Laws § 33-8-102 and § 39-5-20 (a) SCUTPA) (4th Cir. No. 15 at 2). "The Court asks not whether a judge harbors an actual, subjective bias, but instead whether, as an objective matter, the average judge in his position is likely to be neutral, or whether there is an unconstitutional potential for bias." Rippo v. Baker, 580 U.S.___(2017). In Petitioner's case, the three decisionmakers involved showed enormous "potential for bias:" the

Magistrate Judge, the District Judge, and the Court of Appeals. The Appeals Court has decided many cases where the judge has showed bias. "The scope of judicial review by the federal courts is narrowly tailored to determine whether the [judge] supported his findings with substantial evidence and applied the correct law." Hays v. Sullivan, 907 F.2d 1453, 1456 (4th Circ. 1990); Mascio v. Colvin, 780 F.3d 632 (4th Cir. 2015); Woods v. Berryhill, 983 F.3d 686 (4th Circ. 2018); Arakas v. Comm'r Soc. Sec. Admin., 983 F.3d 83, 94 (4th Cir. 2020). (4th Cir. No. 9 at 16). In Petitioner's case, the Appeals Court forgot to apply his own standards and found "no error" by the District Court. Such a conduct is plain error that warrants review by the Supreme Court.

8. Half-truth of ECF No. 65 at 8-9 (App'x B). Judge Cain makes silence to the fact that Petitioner's Motions for Default and for Default Judgment clearly state that Respondents failed to comply with S.C. District Court Local Civil Rule 5.02 that mandates to electronic filers to ***verify*** documents filed (4th Cir. No. 9 at 9-11). This means that documents must be signed under penalty of perjury or subordination to perjury. Judge Cain falsely and misleadingly states that the mandate is for *pro se* litigants only, where the truth is that the rule goes the other way: to *pro se* parties the Court issues the ROSEBORO ORDER (DC ECF No. 28) which –among other instructions, mandates to sign papers as true under penalty of perjury or subordination to perjury, and states that *pro se* parties cannot file electronically. Again, Civil Local Rule 5.02 is for lawyers, and only lawyers are allowed to file electronically, and Judge Cain is not only wrong but shows bias. Rule 5.02 is in connection to the exception of F. R. Civ. P. Rule 11 (a) (4th Cir. No. 9 at 9-12, 14, 15) and the half-truth in DC ECF No. 65 at 8, is bias *per se*. The

The Appeals Court affirming such a decision warrants review by the Supreme Court.

9. False accusation against Petitioner. On CF No. 65 at 9 (App'x B), in the first line Judge Cain states, "Plaintiff [Petitioner] who purports to be an attorney." (4th Cir. No. 9 at 15-16). Petitioner never claimed to be a licensed lawyer or attorney anywhere in the Complaint (DC ECF No. 1) and in any other documents filed with the District Court. Petitioner answer to Question No. "IV RELIEF" official court form (DC ECF No. 1 at 11-12), states his academic credentials to show damage to his reputation and morale, one of those credentials is a Juris Doctor degree or law school graduate, and a PhD. (4th Cir. No. 9 at 15) The judge came with the false accusation in a clear show of bias. This Supreme Court has addressed on cases of half-truth that, "the duty to disclose arises from the truth already half-spoken." Universal Health Services, Inc. v. United States, 136 S. Ct. 1989, 1999 (2016). Hon. Roger T. Benitez, United States District Judge, wrote that, "Half the Truth is often a great lie." U.S.A. v. Spanier, Case No. 16cr1545-BEN; 637 Fed. App'x. 998, 1000-01 (9th Cir. Jan. 21, 2016). Given the above facts –is plain error, and this case deserves a review from the Supreme Court of the United States.

10. Offensive language against Petitioner. On ECF No. 65 at 9 (App'x B), regarding Petitioner, Judge Cain wrote, "__ seems to misunderstand the distinction between motion papers filed by attorneys and "affidavits, declarations, and other documents attesting to the truth of the facts –which require verification via oath to have evidentiary value." (4th Cir. No. 9 at 10, 14-15) I will let this Court to interpret S.C. District Court Local Civil Rule 5.02, whether it applies to attorneys (licensed lawyers). The rule textual reads:

(A) This court utilizes an Electronic Case Filing System (ECF) twenty-four (24) hours a day, seven (7) days a week, for receiving and storing documents filed in electronic form. Documents must be filed, signed,

*and **verified** [emphasis added] by electronic means to the extent and in the manner authorized by the court's ECF Policies and Procedures Manual and other related user manuals. A document filed by electronic means in compliance with this rule constitutes a written document for the purposes of applying these Local Rules, the Federal Rules of Civil Procedure, and the Federal Rules of Criminal Procedure."*

In support of his contentions and arguments, Petitioner cited Wooten v. Shook, 527 F.2d 976 (4th Cir. 1975). In Wooten, the Court stated that a motion supported by affidavit or other document must be signed under penalty of perjury, meaning it must be verified. (DC ECF No. 60 at 2). Therefore, Judge Cain is wrong, and the decision by the Court of Appeals denies itself the own Rule 5.02, and SCOTUS Rule 29, and the standard set in Wooten. It is plain error that warrants review by this Court.

11. Applying a non-existent standard to make the final ruling. Judge Cain wrote that, "Plaintiff [Petitioner] has offered no authority showing that Defendants' [Respondents] attorneys are required to sign motion papers or other documents setting forth legal argument under *the pains* (emphasis added) and penalties of perjury." (DC ECF No. 65 at 9- App'x B) (4th Cir. No. 9 at 17, 18). The judge added the words "the pains" to Petitioner's claim presented pursuant S.C. Civil Local Rule 5.02 (A) regarding the verification of documents filed electronically. This is a joke invented by the Respondents (4th Cir. No. 9 at 21-22) that the Magistrate Judge, and then Judge Cain followed suit to make fun and offend Petitioner. Petitioner cited S.C. Local Civil Rule 5.02 as main authority for his claim that Respondents failed to *verify* documents filed electronically. (DC ECF No. 57 at 1). Also cited other authority: 28 U.S.C. § 1746. Unsowrn Declarations Under Penalty of Perjury. (ECF No. 57 at 2). Also cited Fed. R. Civ. P. Rule 11 (a)..."Unless a rule or statute specifically states otherwise [i.e. S.C. Local Civil Rule 5.02 that mandates verification] a pleading need not to be verified or accompanied by

affidavit." (ECF No. 57 at 3). Petitioner cited Hettig v. United States, 845 F.2d 794 (8th Cir. 1988); Mosher v. IRS, 775 F.2d 1292 (5th Cir. 1985); United States v. Moore, 627 F.2d 830 (7th Cir. 1980); Cupp v. Commissioner, 65 T.C. 68 (1975). All of the above establish that, "The law of paper returns [i.e. answer to the complaint, motions and memorandums in support of a motion, replies, sur-replies, and other documents filed with a court of law] is well settled that were [Respondents , or magistrate judges, or judges strikes or obliterates the jurat [or omitting the jurat at all] in such way to negate the threat of perjury, the jurat is void [rendering the document null]." (DC ECF No. 57 at 3). The Respondents [Defendants], Magistrate Judge, and Judge Cain obliterated Petitioner contention that Respondents failed to sign papers "under penalty of perjury or subordination to perjury" by adding the evil words "the pains" and "Plaintiff [Petitioner] objections to the Report [Magistrate Judge R&R DC ECF No. 53] are premised on this basis...the Court rejects and overrules them." (DC ECF No. 65 at 9-App'x B). The judge's statement is not supported by the record, and is half-truth amounting to a lie, it is a joke offensive to Petitioner, and constitutes a clear show of bias because "appellant [Petitioner] never wrote [the word pains] or added in all his filings." (4th Cir. No. 9 at 22). Justice Thomas may qualify the MJ-R&R as "implied false certification." Universal Health Services v. United States, 579 U.S. 176 (2016). Justice Thomas adds that, "[a] representation stating the truth so far as it goes but which that maker knows or believes to be materially misleading because of his failure to state additional or qualifying matter is actionable misrepresentations." Restatement (Second) of Torts § 529, p.62 (1976). Justice Thomas also states that, "A statement that misleadingly omits critical facts is a

statement is not supported by the record. Petitioner argued that Defendants [Respondents] were served with process via USPS Certified Mail Return Receipt Requested, as mandated by S.C. R. Civ. P. Rule 4 in order for the District Court to acquire personal jurisdiction. (4th Cir. No. 9 at 3) Due process is not violated because Respondents have been conducting business in South Carolina since February 3, 2012 under the name "Carolinas Facebook, LLC as proven with the Certificate of Existence issued by the Secretary of State of South Carolina Mark Hammond. (4th Cir. No. 15, Exhibit B)(App'x *infra* # F). This uncontroverted and irrefutable evidence shows a total contradiction to statements contained in the final Order of 7/19/24 (DC ECF No. 65 at 7). A corporation registered, organized and incorporated in South Carolina, Respondents need not minimum contacts with the forum state. Petitioner not only objected but also argued in several occasions against the personal jurisdiction position by the Magistrate Judge, pointing at it as *plain error*. On DC ECF No. 57, Petitioner objected to the MJ-R&R at 7, 8, 9, and 11 as follows: p. 7, "1. Personal Jurisdiction, stating that the R&R is plain error, "because this court has personal jurisdiction over the Defendants." (a)..p. 9 (b)...citing Rule 4 SC R. Civ. P., citing Fed. R. Civ. P. Rule 4 (e), (k)(2). The final Order of 7/19/2024 acknowledges Petitioner's argument regarding personal jurisdiction, ending on p. 8 that, "Plaintiff concludes the Report [ECF No. 53] is in error for failing to take this points into account. See id. At 1." Petitioner argue that Respondent Zuckerberg was served with process within the forum state through his attorneys of record due to the attorneys claiming Zuckerberg was not served on 8/28/2023, as proven by ECF No. 17. (4th Cir. No. 9 at 5) "If the defendant does speak, he must disclose enough to prevent

his words from being misleading." Justice Thomas in Universal Health Svcs. v. United States (*supra*), citing W. Keeton, D. Dobbs, R. Keeton & D. Owen, Prosser and Keeton on Law of Torts § 106, p. 738 (5th ed. 1984). A total of five (5) pages of Petitioner's OBJECTIONS TO REPORT & RECOMMENDATION BY THE MAGISTRATE JUDGE (DC ECF No. 57) arguing the applicable law to the facts makes Judge Cain's statement a clear show of bias, clear error that warrants review by this Court.

14. A lie. The District Court reviewed only the Magistrate Judge R&R (DC ECF No. 53; 65 at 9; App'x B) that is filled with half-truths, misstatements, and inconsistencies not supported by the record, and forgetting –either naïve or intentionally, to check and review Petitioner filings with supporting documents as evidence (almost all Petitioner's filings have Exhibits attached) on the record, is unfair to Petitioner, and a lie that constitute clear plain error in violation of Petitioner's constitutional right to due process. The Appeals Court 4th Cir. ruled "found no error" (4th Cir. No. 19 at 1; 20-1 at 1; 20-2 at 1; App'x A) is also a misstatement because did not review the entire record in clear and plain error that warrants review by this Court because the Appeals Court decision constitutes affirmation of the District Court bias in violation of Petitioner right to due process, a plain error that warrants review by this Court.

15. Documents attached as EXHIBIT A to ECF No. 57 (Objections to MJ-R&R) were initially filed by Petitioner at the District Court on 09/25/2023 at 3:43 PM. The filing of real paper was made in person at District Court front desk, and should be ECF No. 25, but mysteriously disappeared from the Official Docket (4th Cir. #9 at 4). The documents filed September 25, 2023 at 3:43 PM, show the Court's time-clock seal, stamped by the

Clerk's Assistant at the Court. The filing was in person on real hard paper complying with the Court Order filed on 07/28/2023 (DC ECF No. 9), mandating that Petitioner being *pro se* litigant, be allowed to file only paper documents (not electronically) at the address: 250 East North Street, Room 2300, Greenville, South Carolina 29601." On previous Order, the Court stated that, "7:23-cv-03306-TMC-KFM Notice will not be electronically mailed to: Israel Romero." Failing to make the entry on 9/25/2023, not making any note of it, or not returning the documents to Petitioner is clear show of bias but also fraud pursuant to Fed. R. Civ. P. Rule 60 (b)(3). This point was presented to the Appeals Court and surprisingly the Appeals Court "found no error," (4th Cir. No. 9 at 4, 9), and gave no further explanation against its own standard that states, "When a court renders a decision, the court must 'provide an adequate explanation for the [order].'" United States v. Jackson, Case No. 23-4580 (4th Cir. January 31, 2025). The acts or inaction by both lower courts, the District Court and the Court of Appeals, is plain error that warrants review by the Supreme Court.

16. The District Court Judge in his final Order of 7/19/2024 (App'x B) gives the impression that Petitioner abandoned his Motions for Default and for Default Judgment. Judge Cain wrote that, "To the extent that any of Plaintiff's objections to the Report are premised on this basis –that the attorneys for the Defendants did not sign the motion papers or other litigation documents under oath – the Court rejects and overrules them." (DC ECF No. 65 at 9) (4th Cir. No. 9 at 16). Neither the Magistrate Judge nor Judge Cain called for a hearing on Petitioner's motions but made silence, until in the final Order denied both Petitioner's motions. Take notice that on June 24, 2024, Petitioner filed a

Proposed Order of Default Judgment (DC ECF No. 64) in favor of Petitioner. This is evidence that Petitioner did not abandon his motions, especially the Motion for Default Judgment, and Petitioner kept alive his theory of Respondents failure to *verify* documents. Justice Thomas wrote that, "[A] statement that contains only favorable matters and omits all reference to unfavorable matters is as much a false representations as if all the facts stated were untrue." Justice Thomas on Universal Health Svcs. v. United States (*supra*) citing Restatement (Second) of Torts § 529, Comment *a*, pp. 62-63 (1976). However, the Court of Appeals "found no error." Therefore, the decision by the lower Court is plain error that warrants review by the Supreme Court.

17. The Court of Appeals for the Fourth Circuit ruled against Petitioner in contravention of its own rulings and standards. In United States v. Jackson, Case No. 23-4580 (4th Cir. Jan. 31, 2025), the Appeals Court stated that when a court renders a decision, "The court must provide an adequate explanation for the [decision or order]." However in our case, same tribunal only wrote that, "We have reviewed the record and find no reversible error." (4th Cir. No. 19 at 3; App'x A). That is not an explanation at all. On Langford v. Joyner, 62 F.4th 122, 123 (4th Cir. 2023), the 4th Cir. wrote that, "On review, we must accept as true the facts as alleged in the complaint." The standard should be applied to the APPELLANT'S BRIEF too (4th Cir. No. 9), but the Appeals Court failed to apply it in clear show of bias against Petitioner. In Annappareddy v. Pascale, 996 F.3d 120, 132 (4th Cir. 2021) the 4th Cir. wrote that, Bivens claims before us are for the denial of procedural due process and equal protection." In Petitioner's case, the claim of bias is well detailed for violation of Petitioner's U.S. Constitution XIV Am. rights of due process and equal

protection of the laws but the Appeals Court failed to say a word about it. In Arevalo Quintero v. Garland, No. 19-1904 (4th Cir. 2021), the 4th Cir. ruled that the lower court erred and showed bias on particular social groups as stated in Matter of W-Y-C (BIA 2018) and in mischaracterizing Arevalo-Quintero's (*supra*)claim. The question to the Supreme Court in this particular matter is whether the Court of Appeals showed bias and mischaracterized Petitioner's claim. In Lucas II v. United States of America, 4th Cir. No. 24-1128 (4th Cir., February 5, 2025), the Appeals Court in a claim of discrimination and retaliation issues, found that Lucas was victim of retaliation. Petitioner's claim also has pointed out to discrimination and retaliation (DC ECF No. 60 at 5-6), but the District Court and the Appeals Court as well, ignored it in clear show of bias: error that warrants review by the Supreme Court. In Matthew Perkins v. International Paper Co., 4th Cir. No. 18-1507 (4th Cir., August 27, 2019), the Fourth Circuit found that discrimination or bias against Perkins [a Black person] "falls into three categories: (1) mistreatment, in various ways compare to White employees; (2) improper denials of requests for promotions; and (3) racially offensive conduct and statements at work." Remember that Petitioner is male Hispanic born in Honduras, and Respondents wrote to the Court that Petitioner is a lawyer from Honduras, and Respondents invented a criminal case at "People v. Romero, 698 N.E.2d 424 (N.Y. Ct. App. 1998 (DC ECF No. 33 at 3) Petitioner filed a Certificate from the N.Y. Court of Appeals that shows: "No records found." (DC ECF No. 34, Exhibit A)(App'x *infra* # E). The District Court made silence about this conduct that Petitioner categorizes as "racially offensive conduct" by Respondents, and the District Court also denied Petitioner's motions. Similarities between Perkins and Romero are not

a haphazard but showing of blatant discrimination and retaliation against Petitioner, and the Appeals Court found no error. It is plain error that warrants review by this Court.

18. On 4/17/2024, the District Court granted Petitioner's Motion to Strike Jane Doe aka Iga Mariana as Defendant, adopting also the MJ-R&R (DC ECF No. 61-App'x C). However, the remaining Respondents Meta Platforms, Inc., and Mark Zuckerberg, included Jane Doe a/k/a Iga Mariana as Appellee in both the Informal Response Brief and the Appellees' Opposition to Appellant's Motion To Filing Evidence of After-Discovered Fraud (4th Cir. Nos. 13, 16) The Appeals Court in the final Order denying the Motion and affirming the District Court's order (4th Cir. No. 19 at 3; App'x A), included the excluded Defendant Jane Doe a/k/a Iga Mariana. Petitioner found this inclusion of a struck Defendant to be not only abuse of authority but also "nuanced" and "implicit bias" (see Woods v. Greensboro, 855 F.3d 639 (4th Cir. 2017) in addition to insult to Petitioner. Above everything, the ruling *including* an *excluded* Defendant means that the District Court had no authority to render a decision in Petitioner's case, and that the orders of 4/17/2024 No. 61, and final Order of 7/19/2024 No. 65 are null and void, and the decision by the 4th Cir. of 12/23/2024 No. 19 is –by consequence, null and void. This Supreme Court has ruled that, "A judgment may not be rendered in violation of constitutional protections. The validity of a judgment may be affected by a failure to give the constitutionally required due process notice and an opportunity to be heard." Earle v. McVeigh, 91 U.S. 503; 23 L.Ed 398. Justice Thomas wrote that, "The term "material" [as in misrepresentations] means having a natural tendency to influence, or be capable of influencing [the Judge or the Appeals Court]." Universal Health Services (*supra*). The

Respondents started influencing the District Court since filing their Answer to the Complaint (DC ECF No. 25); then, followed influencing the Appeals Court (4th Cir. Nos. 13, 16). The Appeals Court, following the influence from Respondents and from the District Court, has showed plenty of bias (App'x A) in violation of Petitioner's constitutional rights, is plain error that warrants review by the Supreme Court.

19. On 10/21/2024, Petitioner filed a Motion at the Appeals Court for permission to file newly after-discovered evidence believed to be constitutive of fraud by Respondent. Since February 3, 2012, under the brand name of Carolinas Facebook, LLC, Respondents have been conducting business in South Carolina as proven with the Certificate of Existence issued by SC Secretary of State Mark Hammond (4th Cir. Dkt. No. 15 Exhibit B- App'x F). With this evidence, Petitioner met the standard for Rule 60 (b)(3) relief. This "extraordinary" remedy requires both, (1) "proving the misconduct complained of by clear and convincing evidence;" and, (2) "demonstrating that such misconduct prevented [Petitioner] from fully and fairly presenting his claim or defense." McLawhorn v. John W. Daniel Co., 924 F.2d 535, 538 (4th Cir. 1991). The Certificate of Existence of Carolinas Facebook, LLC, refers to the parent corporation Meta Platforms, Inc. (Meta), that changed the corporation name later on October 28, 2021 (SCDC ECF No. 25 at 1 on footnote 1)(App'x *Infra* #F), and proves that when Respondents did not disclose the existence of official registration in the forum state since 2012, Petitioner had no need to allege or defend his position regarding personal jurisdiction because no minimum contacts are necessary pursuant to South Carolina Code of Laws § 33-8-102 which states, "A director [of a corporation] need not to be resident of this State or a shareholder of the

corporation" to be responsible or liable for the conduct and for all acts and omissions of the corporation, other directors or officers, or employees, in application of the "piercing the corporate veil" doctrine as a matter of law, and need not to be called or alleged in the complaint. Respondents' conduct of hiding crucial information and documents and not disclosing them, and the District Court preventing Petitioner to request those documents in "discovery" contributed to prevent Petitioner from "fairly and fully presenting his claim or defense." South Carolina Code § 39-5-20 (a) (Chapter 5 – Unfair Trade Practices Act SCUTPA) declares "any unfair and deceptive acts or practices in the conduct of any trade or commerce to be unlawful." Respondents admit that Carolinas Facebook, LLC is a "domestic corporation" but, "It is not a registration of Meta, a Delaware entity and the named Defendant in this action, nor does it establish that Meta is registered to conduct business in South Carolina. See id. at 134-35 (describing South Carolina's "[C]ertificate of [A]uthority" registration requirements for foreign corporation[s]. Romero points to nothing indicating that the South Carolina entity, which Defendants are unaware of, is affiliated with or related to Meta in any way." (4th Cir. No. 16 at 3-4) Respondents admit that Carolinas Facebook, LLC is a "domestic corporation," and as such need not minimum contacts as a mater of law. Respondents lie when state that Petitioner did not connect the "Certificate of Existence" to Meta Platforms, Inc. When Carolinas Facebook was registered in South Carolina (App'x F), Facebook was conducting business as such, and became Meta Platforms, Inc.: changed the brand name to Meta Platforms, Inc. in 2021. On the Appeals Court in Entry No. 15 at 3-4, Petitioner connects directly Carolinas Facebook, LLC with Meta Platforms, Inc. Petitioner explains

that initial research gave no results from Facebook in South Carolina. "The reason is because the defendants-appellees [Respondents] have been operating under the name of CAROLINAS FACEBOOK, LLC, a 'company duly organized under the laws of the State of South Carolina on February 3, 2012..." as proven with the CERTIFICATE OF EXISTENCE issued on October 9, 2024 by the Secretary of State Mark Hammond, hereby attached as EXHIBIT B and offered in evidence to support this motion."(App'x *infra* F) Respondents failed to DENY neither the validity of the Certificate of Existence nor that Facebook (the named Defendant in the Complaint at ECF No. 1 changed to Meta by Respondents initiative) has been conducting business in South Carolina since 2012. The Appeals Court had no consideration for the evidence and did not reviewed or analyzed properly the documents on record neither at the District Court nor at the Appeals Court, in clear show of bias, a plain error that warrants review by this Court.

(b) Newly Acquired Evidence Of After-Discovered Fraud

On the appeal before the United States Court of Appeals for the Fourth Circuit, Petitioner argued based upon the record that (1) the District Court has personal jurisdiction over the Respondents, and (2) that the district Court incurred in prejudice and bias when rendered the final decision (4th Cir. No. 15 at 2).

Petitioner filed a Motion for Filing Evidence of After-Discovered Fraud pursuant to Fed. R. Civ. P. Rule 60 (b)(3) (4th Cir. No. 15). The argument is that Respondents deceived the District Court, then tried to deceive the Appeals Court, "when omitted, hide, misrepresented that Meta Platforms, Inc. and Marck Zuckerberg have no minimum contacts with the State of South Carolina, and that have no offices and no registration in

the forum state. After newly-discovered facts and evidence [App'x *infra* F], it turns that the [Respondents] incurred in fraud." (4th Cir. No. 15 at 2) On October 9, 2024, the South Carolina Secretary of State Mark Hammond issued a CERTIFICATE OF EXISTENCE certifying that "Carolinas Facebook, LLC, a limited liability company duly organized under the laws of the State of South Carolina on February 3rd, 2012, with a duration that is at will...that the Secretary of State has not mailed notice to the company that is subject to being dissolved by administrative action pursuant to S.C. Code Ann. § 33-44-809, and that the company has not filed articles of termination as of the date hereof." The Certificate of Existence is attached as EXHIBIT B to the Motion (4th Cir. No. 15)(App'x F). The Appeals Court denied the motion without explanation, against own standards. "When a court renders a decision, the court must 'provide an adequate explanation for the decision'" United States v. Jackson, Case No. 23-4580 (4th Cir. Jan. 31, 2025)

The Fed. R. Civ. P. Rule 60 (b) states, "Grounds for relief from a final judgment, order or proceeding. On motion or just terms, the court may relieve a party...from a final judgment for the following reasons: (1)...(2)...**(3) fraud (whether previously called intrinsic or extrinsic), misrepresentation, or misconduct by an opposing party**;"

Respondents did not deny the existence of Carolinas Facebook, LLC, did not deny the Certificate of Existence to be authentic, and did not deny Meta Platforms, Inc., as parent corporation of Facebook (this corporation being the original Defendant in the Complaint, that later was turned into Meta Platforms, Inc. for the insistence of Respondents). All of the above falls into place to be misrepresentations over misrepresentations by the two (2) Respondents and clear show of bias, and inducing the District Court, the Magistrate

the equal protection of the laws, especially if the new facts constitute "after-discovered fraud." Hazel-Atlas Glass Co. v. Hartford Empire Co., 322 U.S. 238 (1994). In Hazel, the Court wrote, "From the beginning there has existed along side the term rule a rule of equity to the effect that under certain circumstances, one of which is after-discovered fraud, relief will be granted against judgments regardless of the term of the entry." Marine Insurance Co. v. Hudgson, 7 Cranch 332, 3L.Ed. 362; Marshall v. Holmes, 141 U.S. 589 (1891), 12 S.Ct. 62, 35 L. Ed. 870. The Appeals Court affirmed a heavily biased District Court decision, in a show of bias in violation of Petitioner's constitutional rights.

As on Marshall v. Holmes (supra) Petitioner "alleges that the above judgments were obtained on false testimony and forged documents [the Respondents omitting important facts and documents], and that equity and good conscience required that they be annulled and avoided." Take notice that Klugh v. United States, 620 F.Supp. 892 (D.S.C. 1985) states that, "Judgment is void if court that rendered [the] judgment...acted in a manner inconsistent with due process." (Fed. R.Civ. P. Rule 60 (b)(4)) The Order of the District Court, and the decision by the Appeals Court are filled with bias in violation of Petitioner's constitutional rights to due process and equal protection of the laws as guaranteed by the XIV Amendment, error that warrants review by the Supreme Court.

(c) The question presented warrants this Court's review.

Repeatedly in court papers and in open court, litigants reiterate that the word of a person may not be worthy, or even his writings. But everyone concludes that the force of official documents is more powerful that any man's voice. Senator Richard Blumenthal (D-Conn) in the impeachment proceedings against President Donald Trump, stated that,

"These documents tell a story. Documents don't lie." Michael Cohen, admitting he is a liar said that, "Documents don't lie." Prosecutors in the State of New York told the jury – in a criminal case against President Trump, against his word of mouth –allegedly false, "Documents don't lie." Chapter V of Indian Evidence Act, Comment (a) states, "A man may lie but documents will never lie." If the above statements are true: why courts do not review all documents submitted by both parties in Petitioner's case? Perhaps, the answer should be: due to bias, a plain error. The question presented warrants this Court's review.

As a Christian anointed by Jesus Christ with Fire and the Holy Spirit, Petitioner's duty is to proclaim the Word of God. The Lord says –as He told Moses when appointed him to judge His people: "Do not pervert justice; do not show partiality to the poor or favoritism to the rich, but judge everyone fairly." Leviticus 19:15. Please review all documents from the South Carolina District Court, and from the Court of Appeals for the Fourth Circuit, and you will find the Truth, and will redress Petitioner for the plain error committed by the lower Court.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Dated: February 20, 2025

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