

IN THE SUPREME COURT OF THE UNITED STATES

ISRAEL ROMERO, Petitioner

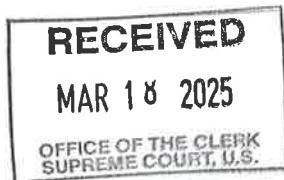
v.

META PLATFORMS, INC., ET AL.

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

**SUPPLEMENTAL BRIEF PURSUANT TO
SCOTUS RULE 15 (8) ON PETITIONER'S
PETITION FOR A WRIT OF CERTIORARI**

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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.

(I)

PARTIES TO THE PROCEEDING

PETITIONER: Israel Romero (Appellant below)
Pro Se
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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.
1 Hacker Way
Menlo Park, San Mateo County
California 94025

Respondents represented by: Katherine E. Munyan
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51 West 52nd Street
New York, NY 10019
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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TABLE OF AUTHORITIES

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IN THE SUPREME COURT OF THE UNITED STATES

No. 24-6673

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

SUPPLMENTAL BRIEF PURSUANT TO SCOTUS RULE 15 (8) ON PETITIONER'S 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. The original PETITION was filed on February 20, 2025, and placed on the docket February 28, 2025.

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
In addition to the XIV Amendment, other pertinent constitutional and statutory provisions are reproduced in the appendix. App'x *infra*, # G of the Petition.

STATEMENT OF THE CASE

In addition to the STATEMENT OF THE CASE in the original Petition for a Writ of Certiorari filed in this Court on February 20, 2025, and placed on the docket February 28, 2025, incorporated here by reference, Petitioner found two more pieces of evidence and relevant case law that may bring a clearer light to this case.

After submitting the original brief for his Petition for a Writ of Certiorari, Petitioner was able to obtain documents from a case cited by the Respondents in their filing titled “Answer to the Complaint” and “Motion to Dismiss” (ECF No. 33 at 2-3, footnote 5, stating “A lawyer from Honduras”) The secured documents are hereby attached as APPENDIX H (they are in addition to the Appendices in the original Petition). These documents are the evidence necessary to corroborate Petitioner’s claim of bias and violation of his Constitutional rights.

The second reason that triggered this SUPPLEMENTAL BRIEF of Petitioner, filed pursuant to the Supreme Court of the United States (SCOTUS) Rule 15 (8), is a case decided on March 3, 2025, or eleven (11) days after Petitioner filed his Petition in this Court. The case is Speech First, Inc. v. Pamela Whitten, et. al., 604 U.S. ____ (2025). The petition was denied, but Justice Thomas cited Indiana University (IU) Rules for the definition of “bias incidents” that not only applies to Petitioner’s case but also brings light to this Court and to the country in a very delicate as important issue of bias in the life of Americans.

Documents obtained from a case tried more than fifteen (15) years ago that is closed and sealed due to a PARDON (original Petition Appendix D), was a hard task to

accomplish. The documents are evidence that Judge Cain took the verbatim from the Indictment (App'x H hereby attached), and from excerpts of the trial transcript (also attached to the same App'x H), that are irrefutable evidence of the judge's bias. Those documents were received by Petitioner after February 20, 2025 when Petitioner had filed his Petition. The other material included in this SUPPLEMENTAL BRIEF is a decision by this Court rendered on March 3, 2025, after Petitioner had filed his Petition, and all of the above assists this Court because warrant review of the lower court's decision.

REASONS FOR GRANTING THE PETITION

In addition to the REASONS FOR GRANTING THE PETITION stated in the original Petition for a Writ of Certiorari filed on 2/20/2025, and placed on the Docket February 28, 2025, incorporated here by reference, this SUPPLEMENTAL BRIEF is intended to bring more light to this Court in Petitioner's attempt to obtain this Court granting certiorari and review the lower court's decision.

(a) A lawyer from Honduras

In the Petition for a Writ of Certiorari filed on February 20, 2025, Petitioner stated on REASONS FOR GRANTING THE PETITION (p. 4) number "3" at 7 that Respondents lied to the District Court by citing a case that was unpublished and PARDONED by the State of South Carolina (at 8).

On his Petition dated 2/20/2025, Petitioner at 13 states No. "9. False accusation against Petitioner. On [E]CF No. 65 at 9 (App'x B [of the original Petition]), 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 official 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." (original Petition at 13)

The judge was incited, motivated in whole or in part by the bias and prejudice from Respondents on their filing of November 6, 2023 at the District Court Docket No. 33 at 2-3, titled 'DEFENDANTS' REPLY IN SUPPORT OF THEIR MOTION TO DISMISS PLAINTIFF'S COMPLAINT OR IN THE ALTERNATIVE, TO TRANSFER.' The fact is: Respondents cited Case No. 1476052 in Greenville County Court of General Sessions. The INDICTMENT on that case reads in pertinent part, "Israel Romero did present himself as an attorney to...purporting to represent..." (see App'x H of this Supp. Brief) Judge Cain took the verbatim from this INDICTMENT and wrote, "Plaintiff [Petitioner] purports to be an attorney." ([E]CF No. 65 at 9 (App'x B of the original Petition)

Excerpts from the transcript of the same case No. 1476052, during a Motion read on Page 24: THE COURT: "...someone not born in the United States is charge[d] – what exactly is his immigration status?... MR. WARDER: Your Honor, he is born in Honduras ... Was granted citizenship... My concern is that immigration, legal and illegal, has been said so much in the news..." (App'x H)

On Page 25 excerpts from the trial transcripts of same Case No. 1476052, during the

Jury Qualification process reads: “MR WARDER: He is a citizen. He’s an immigrant though. He’s is a citizen that was born in a foreign country and immigrated here.” (App’x H).

Another excerpts from same case No. 1476052, during the Jury Qualification process, on Page 30, lines 9-11 reads, “Now, as I mentioned, Mr. Romero is a United States citizen. He, as I been advised, was born in Honduras.” (App’x H)

When Judge Cain recited the verbatim of the INDICTMENT on the Case No. 1476052 against Petitioner showed plenty of bias, after Respondents pushed him to do so. All of the above were involved in a “bias incident” that includes any conduct, speech, or expression, motivated in whole or in part by bias or prejudice meant to intimidate, demean, mock, degrade, marginalized, or threaten Petitioner as an immigrant, Hispanic from Honduras, based on that individual or member of a group, actual or perceived identity. The Court of Appeals founding no error, confirmed the bias by the District Court, conduct that is plain error that warrants review by this Court.

(b) Definition of the Term “Bias Incident”

Justice Thomas “respectfully dissenting” of the denial or certiorari cited two rules that apply to Petitioner’s case. The fist rule is Indiana University (IU) definition of “bias incidents,” and the second is SCOTUS Rule 10 (a). On March 3, 2025, this Court decided the Case Speech First, Inc. v. Pamela Whitten, ET. AL., 604 U.S. ____ (2025). The Court denied the petition for a writ of certiorari. Justice Alito would grant the petition, and Justice Thomas wrote a dissenting opinion, and Petitioner makes reference to some points to be considered by this Court.

In his dissenting opinion Justice Thomas wrote that, “Indiana University (IU) operates a bias response team that is emblematic of the genre. IU’s team has advertise on its website and on social media [platforms] that students should report “bias incidents” to the school.” 2024 WL 3964864 *1 (SD Ind., Aug. 28, 2024) For purposes of Petitioner’s case, it is important to remark that Justice Thomas cites IU’s definition of the term “bias incidents” to “include ‘any conduct, speech, or expression, motivated in whole or in part by bias or prejudice mean to intimidate, demean, mock, degrade, marginalized, or threaten individuals or groups based on that individual or group’s actual or perceived identities.’”

Paraphrasing Justice Thomas, Petitioner can tell this Court that the Federal Appeals Court of the Fourth Circuit refusal to intervene leaves the subject of a “patchwork of” the XIV “Amendment rights” that the Supreme Court should resolve. Justice Thomas is correct when writes that, “Because one of our primary functions is to resolve ‘important matter’ on which the courts of appeals are ‘in conflict,’ we should not let this confusion persist.” Gee v. Planned Parenthood of Gulf Coast, Inc., 586 U.S. 1057 (2018) (Thomas, J., dissenting from denial of certiorari)(quoting this Court’s Rule 10 (a))

(c) The question presented warrants this Court’s review

In addition to the contents of the original Petition filed on 2/20/2025, and placed on the Docket February 28, 2025 incorporated here by reference, this Court should have in consideration the documents and arguments based upon said documents that Petitioner presents in this SUPPLEMENTAL BRIEF. Remember that documents do not lie. Justice Thomas citation of Indiana University policy on Bias Reporting with the definition of

“Bias Incidents” falls exactly within the scope of review by this Court of Petitioner’s petition. Therefore, the decision by the Court of Appeals that finds no error of the District Court’s decision where there are sixteen (16) “incidents” of bias, and the Appeals Court itself incurring in three (3) more “incidents” of bias, warrants review by this Court.

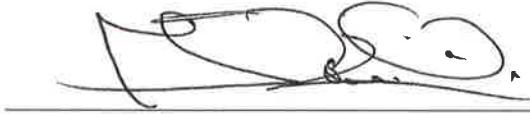
CONCLUSION

The petition for a writ of certiorari should be granted.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

Dated: March 8, 2025



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IN THE SUPREME COURT OF THE UNITED STATES

No. 24-6673

APPENDIX H

**INDICTMENT ON THE GREENVILLE COUNTY COURT OF
GENERAL SESSIONS IN THE CASE No. 1476052**

**EXCERPTS FROM THE TRANSCRIPT OF MOTIONS AND
JURY QUALIFICATION PROCEEDINGS IN GREENVILLE
COUNTY COURT OF GENERAL SESSIONS IN THE CASE
No. 1476052, PAGES 24, 25, 30**

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)

INDICTMENT

NOV 18 2008

At a Court of General Sessions, convened on _____ the Grand Jurors of Greenville County present upon their oath:

UNAUTHORIZED PRACTICE OF LAW

That on or about the period between July 6, 2008, and July 24, 2008, Israel Romero did, in Greenville County, wilfully and unlawfully practice or solicit the cause of another person in a legal action without being admitted and sworn as an attorney, to wit: Israel Romero did present himself as an attorney to [REDACTED] did give him legal advice, and did appear in a court of record in Greenville County, purporting to represent [REDACTED] and solicit his cause in a matter before the court.

This in violation of § 40-5-310 of the S.C. Code of Laws, 1976, as amended.

Against the peace and dignity of the State, and contrary to the statute in such case made and provided.


HENRY MCMASTER (WAM)

SOUTH CAROLINA ATTORNEY GENERAL

1 **THE COURT:** Okay. Let's see. Mr. Thompson,
2 if we can close that door.

3 **THE BAILIFF:** That one?

4 **THE COURT:** That one, yes, sir. And don't
5 let the jurors in until we give them the go ahead
6 here. We want to talk about some things.

7 Mr. Warder, if I inquired as to whether they
8 can be fair and impartial in a case where someone
9 not born in the United States is charge -- what
10 exactly is his immigration status?

11 **MR. WARDER:** Your Honor, he is born in
12 Honduras.

13 **THE COURT:** Right.

14 **MR. WARDER:** Legally immigrated.

15 **THE COURT:** Right.

16 **MR. WARDER:** Was granted citizenship, I
17 believe, in '95.

18 **THE COURT:** Okay. So he's a citizen?

19 **MR. WARDER:** He is a citizen.

20 **THE COURT:** All right.

21 **MR. WARDER:** My concern is that
22 immigration, legal and illegal, has been said so
23 much in the news. It's galvanized a lot of
24 people. Politicians have ran on their platforms
25 of immigration. I don't know how polarized the

1 panel will be. It's a Hispanic country he's from.
2 Hispanic immigration is what seems to me -- they
3 are talking about drug wars in Mexico and, uh,
4 all that. I think that out of fairness, we ought
5 to be able to at least ask questions that are
6 designed to find if there's bias or prejudice out
7 of the news coverage or the feelings that have
8 been developed as a result of that against
9 Hispanic people coming here and working.

10 **THE COURT:** But he is a citizen. I don't
11 understand.

12 **MR. WARDER:** He is a citizen. He's an
13 immigrant though. He's a citizen that was born in
14 a foreign country and immigrated here.

15 **THE COURT:** I'll be glad to ask if anyone
16 has such strong feelings about people who are not
17 born in the United States and immigrate here and
18 whether they should be accorded the full rights
19 and responsibilities as other citizens or
20 something like that and inform them that he is a
21 citizen. I'll be glad to do something along those
22 lines. Is that what you want me to do? I mean,
23 I'll do something in that way. I've got your
24 proposed voir dire. I'll make that part of the
25 record. Okay.

1 case include Mark Perry, Karen Martin, Sandra
2 Nikki Martinez, Maria Martinez, Filimon Martinez,
3 Bob Wells, Jill Rothstein. Anyone related by
4 blood or marriage to any of those people I just
5 identified or does anyone have any personal,
6 social or business relationship with any of these
7 potential witnesses? If so, please stand. (No
8 response).

9 Now, as I mentioned, Mr. Romero is a United
10 States citizen. He, as I been advised, was born
11 in Honduras. Is there anyone who has strong
12 feelings about people who were born in other
13 countries and immigrate to this country? Or does
14 anyone have any issues or biases or prejudice
15 related to immigration such that you could not
16 give both sides in this case a fair and impartial
17 trial? If so, please stand. (No response).

18 Is there anyone who has personal beliefs
19 regarding the legal system or lawyers which
20 would, uh, prevent you from giving either side in
21 this case a fair trial which alleges that Mr.
22 Romero committed the unauthorized practice of
23 law? If so, please stand. (No response).

24 Okay. Is there any further voir dire
25 requested by the State?

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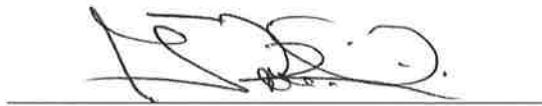
CERTIFICATE OF COMPLIANCE

I, Israel Romero, Plaintiff proceeding *Pro Se*, do hereby CERTIFY: that the preceding Supplemental Brief to the Petition for a Writ of Certiorari complies with Rule 33 and Rule 39 of this Court, and (1)(a) the booklet format is on 8½- by 11-inch paper; (b) it is typeset in a proportionally spaced using Microsoft Word Century family 12-point type (font) Times New Roman, with 2-point or more leading between lines.

This brief (c) is produced on paper that is opaque, unglazed, and not less than 60 pounds in weight, and has margins of at least three-fourths of an inch on all sides; (d) contains 1,752 words complying with the chart in subparagraph (d) 1(g)(iv), excluding the parts of the brief exempted by the rule.

I affirm under penalty of perjury that the foregoing is true and correct.

Date: March 8, 2025



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