

No. _____

24-6746

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

FILED

MAR 07 2025

OFFICE OF THE CLERK
SUPREME COURT, U.S.

In Re _____ FLORA HOI — PETITIONER
(Your Name)

MANDAMUS

ON PETITION FOR A WRIT OF ~~HABEAS CORPUS~~

TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT
AND US DISTRICT COURTS (DDEL, NDTX) ;

MANDAMUS

PETITION FOR WRIT OF ~~HABEAS CORPUS~~

FLORA HOI

(Your Name)

3808 CREEK HOLLOW WAY

(Address)

THE COLONY, TEXAS 75056

(City, State, Zip Code)

(469) 767-1507

(Phone Number)



QUESTION(S) PRESENTED

Petitioner entitled petition "**AFFIDAVIT FOR JUDICIAL DISCLOSURE AND/OR DISQUALIFICATION, RECUSAL APPLICATION SUPPORT TO REMAND**" under 28 U.S.C. §§ 144, 455 and Judicial Conduct Canons 1 and 2 submitted to attach the TRANSFEROR-COURT a transfer order (*United States District Court for the District of Delaware*) on 11-17-2022, which docket record petition appeared being-had-been altered, deleted, or destroyed, erased to the nonexistent state on the CM/ECF (*Case Management Electronic Court File*) from the TRANSFEREE-COURT (*United States District Court for the Northern District Texas*) court docket with court record evidentiary communications or proceedings taken place of transaction between defendants and defense attorneys by means *In Re Tandys Ex Parte* violation defined by 18 U.S.C. §§ 2, 371, 505, 1028, 1029, 1030, 1341; Petitioner filed Judicial Misconduct Complaints with the Third Circuit Court on 03-31-2023 (JC#03-23-90024) and 08-29-2023 (JC#03-23-90085) collectively specifically alleging subject judge, judges violation of 18 U.S.C. §666(a). Despite exhaustion all remedies, the Third Circuit dismiss-to-close petitioners the complaints in the pattern abuse discretion aggravated with a tanned in res judicata. So that the question is:

1. Above Model Rule 3.8 governing the ethical obligation the lower courts, what standard, rule, or procedure should the Court amendable its compliance to ensure Brady Rules material and disclosure from subject judges corruption preeminence to suppression or exemption that violates the Due Process judicial disability jurisdictional disqualification an accuracy determination the criminal culpability?
2. How should the Court to situate low courts records before Congress for the exculpatory impeachable evidentiary proceeding on the Brady Rules material whereat mens rea *In Re Tandys ex parte* undermine the judicial process integrity contravenes the public interest?

1. "*Brady Material*", *Brady Obligation*"; See, e.g., *Brady v. Maryland*, 373 U.S. 83 (1963).

LIST OF PARTIES

☐ All parties appear in the caption of the case on the cover page.

☒ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

Mr. Scott S. Harris
Clerk of Court
The Supreme Court of the United States
One First Street, N.E.
Washington, DC 20543

Clerk of the Panel Ms. Marcella R. Lockert
U.S. JPML
Thurgood Marshall Federal Judiciary Building
One Columbus Circle, NE
Room G-255, North Lobby
Washington, DC 20544-0005

Ms. Patricia S. Dodszeweit
Clerk of Court
United States Court of Appeals
For the Third Circuit
21400 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Mr. Lyle W. Cayce
Clerk of Court
United States Court of Appeals
For Fifth Circuit
F. Edward Hebert Building
600 S. Maestri Place
New Orleans, LA 70130-3408

JUDICIAL CONFERENCE OF THE UNITED STATES
COMMITTEE ON FINANCIAL DISCLOSURE
Attention: Mr. Andrew P. Grant
General Counsel for the Committee
One Columbus Circle, N.E.,
Washington, DC 20544

U.S. SENATE
(CFAA COMPLAINT/IN RE TANDYS EX PARTE)
Senator Dick Durbin
Honorable Committee Chair
Committee on the Judiciary
U.S. Senate
224 Dirksen Senate Office Building
Washington, DC 20510

DEFENDANT#1, DEFENDANT#5
Board of Directors
EVA AIRWAYS CORPORATION
2199 Campus Dr.
El Segundo, CA 90245

DEFENDANT#2
Ms. Donna Culver, Mr. Anthony D. Raucci
and MORRIS, NICHOLS, ARSHT & TUNNELL LLP
POBOX 1347
Wilmington, DE 19899

DEFENDANT#3
Mr. Thomas T. Liu
Ms. Andrea R. Miliano
and PHILLSBURY WINTHROP SHAW PITTMAN LLP
725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5524

DEFENDANT#4
Mr. Jacob Thomas Fain
Mr. Stafford Powell Brantley
Wick Phillips Law
100 Throckmorton Street, Suite# 1500
Fort Worth, Texas 76102

OFFICE OF THE CIRCUIT EXECUTIVE
United States Third Circuit Court
601 Market Street
22409 United States Courthouse
Philadelphia, Pennsylvania 19106-1790

FRAP. Rule 21(a)(l) mandate proceedings relevant subject judge,
judges are:

CLERK OF THE COURT (#122CV00112)
Court Clerk Office
U.S. DISTRICT COURT (DDEL)
844 North King St Unit 18
Wilmington, DE 19801-3570

CLERK OF THE COURT (#322CV02562)
Court Clerk Office
U.S. DISTRICT COURT (NDTX)
1100 COMMERCE STREET, ROOM 1452
DALLAS, TEXAS 75242

CLERK OF THE COURT (#423CV00214)
Court Clerk Office
U.S. DISTRICT COURT (NDTX)
501 WEST TENTH STREET, ROOM#310
FORT WORTH, TEXAS 76102

Hon. Judge Gregory B. Williams
U.S District Court of Delaware
844 N. King Street
Unit 26, Room 6124
Wilmington, DE 19801-3555

Hon. Judge Karen Gren Scholer
United States District Court
1100 Commerce Street, Room 1452
Dallas, TX 75242

Hon. Judge Reed O' Connor
United States District Court
501 West Tenth Street, Room #310
Fort Worth, TX 76102

Hon. Chief Judge Michael A. Chagares
United States Court of Appeals
For the Third Circuit
21400 U.S. Courthouse
601 Market Street
Philadelphia PA 19106

Hon. Judge Kent A. Jordan
Judicial Council and for the Third Circuit
(Hon. Kent A. Jordan, Hardiman, Shwartz, Krause, Restrepo, Sanchez,
Hornak, Connolly, Brann, Bumb)
United States Court of Appeals
For the Third Circuit
21400 U.S. Courthouse
601 Market Street
Philadelphia PA 19106

RELATED CASES

U.S. COURT OF APPEALS FOR THE THIRD CIRCUIT :
(J.C. NO. 03-23-90024), (J.C. NO. 03-23-90085);

AND US DISTRICT COURT :
DDEL (USDC#122-CV-00112),
NDTX (CAUSE#322-CV-02562), NDTX (CAUSE#423-CV-00214);

TABLE OF CONTENTS

OPINIONS BELOW	9
JURISDICTION	10
CONSTITUTIONAL STATUTORY PROVISIONS INVOLVED	11
STATEMENT OF THE CASE	12
REASONS FOR GRANTING THE WRIT	14
(I). PETITIONER HAS A CLEAR RIGHT TO ISSUANCE OF WRIT	14
(II). THE WRIT WILL BE IN AID OF THE COURT APPELLATE JURISDICTION	17
(III). NO OTHER ADEQUATE MEANS TO OBTAIN RELIEF EXIST	17
(IV). WRIT OF MANDAMUS IS WARRANTED UNDER THE CIRCUMSTANCE	18
RELIEF SOUGHT	19
CONCLUSION	19

INDEX TO APPENDICES

APPENDIX A

AFFIDAVIT FOR JUDICIAL DISCLOSURE AND OR
DISQUALIFICATION, RECUSAL APPLICATION /DATED 11-17-2022/
USPS TRACKING#9570 1104 1178 2321 5596 76;

APPENDIX B-1

3RD CIRCUIT RECEIPT OF COMPLAINT (J.C. NO. 03-23-90024)
NONE CONFORM PERSONNEL VIOLATION RULE 8 OF
MANDATED THE "CIRCUIT CLERK" (04-06-2023);

APPENDIX B-2

AOUSC RECORD IN THE CONFIRM NONE CONFORM
PERSONNEL IS NOT JUDICIAL OFFICER OR JUDICIAL EMPLOYEE
(01-09-2024);

**INDEX TO APPENDICES
(CONTINUANCE)**

APPENDIX C

AOUSC RECORD IN THE CONFIRM DISQUALIFICATION 3RD-CIRCUIT COURT JUDICIAL COUNCIL REVIEW DUE TO JUDGE RENEE M. BUMB NEGLECT FILING MANDATED FINANCIAL REPORT DISCLOSURES (09-24-2024);

APPENDIX D

3RD CIRCUIT RECEIPT OF COMPLAINT (J.C. NO. 03-23-90085) NONE CONFORM PERSONNEL VIOLATION RULE 8 OF MANDATED THE "CIRCUIT CLERK" (09-07-2023);

APPENDIX E

EEOC AUTHORIZATION AND NOTICE OF RIGHT TO SUE/
EEOC CHARGE#450-2021-03660/ DATED 11-17-2021;

APPENDIX F

CFAA COMPLAINT
BEFORE CONGRESS (IN RE: TANDYS EX PARTE)/08-17-2023

APPENDIX G

3RD CIRCUIT COURT RECEIPT OF DENYING REHEARING
/11-08-2024;

APPENDIX H

TRANSFFOR-COURT ORDER TO TRANSFER
USDC-DDEL: 2022-10-28;

APPENDIX I

TRANSFFEE-COURT ORDER TO TRANSFER
USDC-NDTX: 2023-02-28;

APPENDIX J

TRANSFFEE-COURT ORDER TO DISMISS
USDC-NDTX: 2023-09-12;

INDEX TO APPENDICES (CONTINUANCE)

APPENDIX K

USCA-3RD CIR: 2023-10-26, JC#03-23-90024
ORDER TO DISMISS;

USCA-3RD CIR: 2023-11-16, JC#03-23-90085
ORDER TO DISMISS;

USCA-3RD CIR: 2025-02-03 JC#03-23-90024, #03-23-90085
REQUEST TO FILE MANDAMUS
NOTICE UNDOCKET APPEAL

APPENDIX L

JPML NOTICE IN ERROR: 2024 -10-17
EEOC IS NOT UNITED STATE S GOVE RNMENT AGENCY ;

APPENDIX M

USCA-5TH CIR: 2024-10-18, JC#03-23-90024, JC#03-23-90085
DECLINE TO INTERVENE ;

APPENDIX N

RECORD SHOWN PERSON IN ALIAS "JEANNE
DONNELLY T. " WHOM AOUSC IDENTIFIED AS NONE-
JUDICIAL EMPLOYEE, BUT ASSOCIATION IN EFFECT
WITH SUBJECT JUDGE.

TABLE OF AUTHORITIES CITED

CASES

<i>Brady v. Maryland</i> , 373 U.S. 83 (1963)	1
<i>Kyles v. Whitley</i> , 514 U.S. 419, 437 (1995)	15
<i>US v. Bagley</i> , 473 U.S. 667 (1985)	16
<i>Mallard vs. US Dist.,</i> 490 U.S. 309 (1995)	17, 18

STATUTES AND RULES

Model Rule 3.8;
Code of Conduct for United States Judges, CANON 3;
The Third Circuit court Rule for its Judicial Conduct and Disability
Proceeding Rule, Rule 8;
18 U.S.C. 2, 371, 505, 666(a), 1028, 1029, 1030, 1341;

IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF ~~HABEAS CORPUS~~ MANDAMUS

Petitioner respectfully prays that a writ of ~~habeas corpus issue~~ MANDAMUS

OPINIONS BELOW

☒ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix [B-1], [D] to the petition and is

☒ reported at J.C. NO. 03-23-90024,
J.C. NO. 03-23-90085; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the United States district court appears at Appendix [A] to the petition and is DDEL (USDC#122-CV-00112), NDTX (CAUSE#322-CV-02562)
NDTX (CAUSE#423-CV-00214);

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

☐ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

JURISDICTION

☒ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was 11-08-2024.

☐ No petition for rehearing was timely filed in my case.

☒ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: 10-12-2024, and a copy of the order denying rehearing appears at Appendix [G].

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

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

FURTHERMORE, COURT REVIEWABLE JURISDICTION IS PURSUANT
28 U.S.C. 1651 ALL WRITS ACT;

☐ For cases from **state courts**:

The date on which the highest state court decided my case was _____.
A copy of that decision appears at Appendix _____.

☐ A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

1. ART.III;
2. Fifth Amendment Due Process Clause;
3. Model Rule 3.8;
4. 28 U.S.C. 144, 455;
5. 28 U.S.C. 351, 364;
6. 18 U.S.C. 666(a);
7. 18 U.S.C. 2, 371, 505, 1028, 1029, 1030, 1341;

**STATEMENT OF THE CASE
& RULE 20.4(A) STATEMENT**

(a) Judicial-Conduct and Judicial-Disability Proceedings.

(1) Federal judges must abide by the Code of Conduct for United States Judges, a set of ethical principles and guidelines adopted by the Judicial Conference of the United States. Judges may not hear cases in which they have either personal knowledge of the disputed facts, a personal bias concerning a party to the case, earlier involvement in the case as a lawyer or financial interest in any party or subject matter of the case. (*See, e.g.* CANON 3: A Judge Should Perform the Duties of the Office Fairly, Impartially and diligently; also, (C) Disqualification (1) A judge shall disqualify himself or herself in a proceeding in which the judges impartiality might reasonably be questioned).

(2) Once the disabled judge behavior breached rules the above whomever has engaged in conduct prejudicial to the effective and expeditious administration of the business of the courts or has become, by reason of a temporary or permanent condition, unable to discharge the duties of the judicial office, then disabled judge become "*Subject Judge*" for Judicial-Conduct and Judicial-Disability Proceedings.

(b) Jurisdictional Res Judicata Exception Disqualification Judicial-Conduct and Judicial-Disability Proceeding Processes;

(3) On 04-04-2023 the Court subrogate Court Appeals for the Third Circuit being-had-been file mark receiving complainant Complaint of Judicial Misconduct or Disability (J.C. No.#03-23-90024)specific alleged subject judge violations 28 U.S.C. 144, 455; 18 U.S.C. 666(a))appearance in criminal statutory defined an effort in the endeavor to attempting to harboring, concealment to covering-up the alleged DEFENDANT DEFENDANTS collectively defense from court sanction of perjury and fraudulent the court disciplinary actions DDLR, Rule 83.6(1)(A)(B)(C)(D), (2)and (3) specification default entered the court (*See, e.g., APPENDIX-B1*).

(4) The Third Circuit court defect in disqualification and or mishandled this alleged Judicial-Conduct and Judicial-Disability proceeding processes because The Third Circuit court Rule for its Judicial Conduct and Disability Proceeding Rule, specifically Rule 8 which mandates the "*Circuit Clerk*" "*(a) Receipt of Complaint. Upon receiving a complaint against a judge filed under Rule 6 or identified under Rule 5, the Circuit Clerk must open a file, assign a docket number according to a uniform numbering scheme promulgated by the Committee on Judicial Conduct and Disability, and acknowledge the complaints receipt.*" (*See, e.g., The Third Circuit court Rule for its Judicial Conduct and Disability Proceeding Rule*);

(5) Contrary however, The Third Circuit court defect in disqualification and or mishandled this alleged Judicial-Conduct and Judicial-Disability proceeding processes because the person in receipt of the complaint appeared as none-qualified "*Assistant Circuit Executive for Legal Affairs*" individual untitled that is other than "*Circuit Clerk*" "(a) *Receipt of Complaint. Upon receiving a complaint against a judge filed under Rule 6 or identified under Rule 5, the Circuit Clerk must open a file, assign a docket number according to a uniform numbering scheme promulgated by the Committee on Judicial Conduct and Disability, and acknowledge the complaints receipt.*" Which breaches The Third Circuit court Rule for its Judicial Conduct and Disability Proceeding Rule 8 specified personnel "*Circuit Clerk*".

(6) Furthermore the Judicial Conference of the United States confirms this none-qualified disqualification and mishandled The Third Circuit court Rule for its Judicial Conduct and Disability Proceeding, that is "*Assistant Circuit Executive for Legal Affairs*" individual untitled other than the "*Circuit Clerk*" whomever is not "*Judicial Officer*" nor a "*Judicial Employee*" (See, e.g., **APPENDIX-B2**). Therefore, this none-qualified disqualification and mishandled The Third Circuit court Rule for its Judicial Conduct and Disability Proceeding should be deemed as invalid and null (See, e.g., **APPENDIX-N**).

(7) Whereby consolidate aforementioned paragraphs the above, the Judicial Conference of the United States confirms this none-qualified disqualification and mishandled The Third Circuit court Rule for its Judicial Conduct and Disability Proceeding should be deemed as invalid and null, because the alleged The Third Circuit court judicial council (*Judge Renee M. Bumb*) at time reviewing its Judicial Conduct and Disability Proceeding whom have not filed mandated disclosure with the Judicial Conference of the United States Committee on Financial Disclosure which reviewable process and decision should be deemed as invalid and null (See, e.g., **APPENDIX-C**. dated 09-24-2024).

(8) Because affiant petitioner applicant complainant for the Court subrogate Court Appeals for the Third Circuit being-had-been file mark receiving complainant Complaint of Judicial Misconduct or Disability (J.C. No.#03-23-90024)specific alleged subject judge violations 28 U.S.C. 144, 455; 18 U.S.C. 666(a), whereat the Model Rules of Professional Conduct, in theory and intent, that the prosecutor in a criminal case shall make timely disclosure to the defense of all evidence or information known to the prosecutor that tends to negate the guilt of the accused or mitigates the offense, and, in connection with sentencing, disclose to the defense and to the tribunal all unprivileged mitigating information known to the prosecutor.

(9) On and beginning the date 11-21-2022 "*Subject Judge*" had been receiving affiant petitioner applicant entitled file "**AFFIDAVIT FOR JUDICIAL DISCLOSURE AND OR DISQUALIFICATION, RECUSAL APPLICATION SUPPORT TO REMAND**" (See, e.g., **APPENDIX-A**. USPS TRACKING NUMBER#9570 1104 1178 2321 5596 76).

REASONS FOR GRANTING THE PETITION

I. PETITIONER HAS A CLEAR RIGHT TO ISSUANCE OF WRIT

A. DUTY TO DISCLOSE;

(10) Both "*Subject Judge*" district court and the Court subrogate Court Appeals for the Third Circuit have a constitutional duty to disclose under the Due Process Clauses if any conflict of interest exist between the "*Subject Judge*" and defense.

(11) The due process right to disclosure of favorable, material evidence applies to "*Subject Judge*" and or relevant "*Subject Judges*" guilt-innocence determinations, whereat affiant petitioner applicant complainant for the Court subrogate Court Appeals for the Third Circuit being-had-been file mark receiving complainant Complaint of Judicial Misconduct or Disability relevant to the above (J.C. No.#03-23-90085) as additional "*Subject Judges*" whomever being-had-been taking in additional part culpable falsification, alerting, deleting, destroying, document, record, mutilating court docket files consist the existence plaintiff affiant petitioner applicant entitled file "**AFFIDAVIT FOR JUDICIAL DISCLOSURE AND OR DISQUALIFICATION, RECUSAL APPLICATION SUPPORT TO REMAND**" since the date 11-21-2022 "*Subject Judge*" receiving in an *ex parte* conspiracy violations 18 U.S.C. 371 (See, e.g., **APPENDIX-D**).

B. IMPEACHMENT EVIDENCE;

(12) Plaintiff affiant petitioner applicant entitled file "**AFFIDAVIT FOR JUDICIAL DISCLOSURE AND OR DISQUALIFICATION, RECUSAL APPLICATION SUPPORT TO REMAND**" since the date 11-21-2022 "*Subject Judge*" receiving, which "*Subject Judge*" disclosure statement is impeachment evidence as if any contacting, communicating, transacting any financial interest exist.

C. TIME OF DISCLOSURE;

(13) Brady obligations mandates the Court subrogate Court Appeals for the Third Circuit court to disclose favorable, material evidence in time prosecutors duty to investigate numerous cases have held before its court that is favorable, material evidence within law-enforcement files, or known to law-enforcement officers, is imputed to the prosecution and must be disclosed. See, e.g., *Kyles vs. Whitley*, 514 U.S. 419, 437 (1995) "*individual prosecutor has a duty to learn of any favorable evidence known to the others acting of the governments*";

D. EEOC AUTHORIZATION RIGHT-TO-SUE;

(14) Plaintiff affiant petitioner applicant entitled file "**AFFIDAVIT FOR JUDICIAL DISCLOSURE AND OR DISQUALIFICATION, RECUSAL APPLICATION SUPPORT TO REMAND**" since the date 11-21-2022 "*Subject Judge*" receiving, which "*Subject Judge*" disclosure statement is impeachment evidence under the authorization of EEOC authorization right-to-sue before the Court and its subrogate courts on behalf the United States. See, e.g., **APPENDIX-E**. Therefore, Plaintiff affiant petitioner applicant entitled to all information prosecution the Third Circuit court to disclose favorable, material evidence in time prosecutors duty to investigate that is as if at any time "*Subject Judge*" and or "*Subject Judges*" contacting, communicating, transacting any financial interest with and or from in between defense. EEOC authorization right-to-sue does not preclusion administrative proceeding process of "*Subject Judge*" and or "*Subject Judges*" disclosure such record communication information whereat JPML plain erred (**APPENDIX-L**).

E. MENS REA ADMISSIBILITY BRADY EVIDENCE CFAA COMPLAINT BEFORE CONGRESS (IN RE: TANDYS EX PARTE);

(15) On the date 08-17-2023 Plaintiff affiant petitioner applicant being-had-been filed entitled "**CFAA COMPLAINT JUDICIAL OFFICER EMPLOYEES VIOLATION 18 U.S.C. 2, 371, 505, 1028, 1029, 1030, 1341**" (known as *In Re: Tandys Ex Parte*) administrative complaint before the Congress proceeding. (**APPENDIX-F**). which compliant the subsequent event "*Subject Judges*" participate altering, deleting, destroying affiant petitioner applicant entitled file "**AFFIDAVIT FOR JUDICIAL DISCLOSURE AND OR DISQUALIFICATION, RECUSAL APPLICATION SUPPORT TO REMAND**" to aiding and abetting "*Subject Judge*" to avoid, evade, prevent, and obstruct to compliance the mandated judicial disclosures.

(16) The "Subject Judges" participate *In Re: Tandys Ex Parte* "corruptly, maliciously, unlawfully, feloniously" in terms, "intentionally, knowingly, willfully" mens rea mental state "intent" apparent for the purposeful altering, deleting, destroying affiant petitioner applicant entitled file "AFFIDAVIT FOR JUDICIAL DISCLOSURE AND OR DISQUALIFICATION, RECUSAL APPLICATION SUPPORT TO REMAND" to aiding and abetting "Subject Judge" to avoid, evade, prevent, and obstruct to compliance the mandated judicial disclosures, which impeachment, standard of materiality application fact on the appellate courts res judicata exception none-qualified disqualification and mishandled The Third Circuit court Rule for its Judicial Conduct and Disability Proceeding undisclosed evidence record fact, that is as if "Subject Judge" and or "Subject Judges" at any time contacting, communicating, transacting any financial interest with and or from in between defense. In *Re: Tandys Ex Parte* before the Court, that as court record shown "Subject Judge" and or "Subject Judges" did so in contacting, communicating with the defense *ex parte* though lacking and pending disclosure of if financial transaction occurred in between defendant defendants or defense.

(17) Whereby reconsolidate aforementioned paragraphs entirely based admissibility fact in general needing for single requesting such BR Rule precedent before the Court *US v. Bagley*, 473 U.S. 667 (1985), and *Kyles v. Whitley*, 514 U.S. 419 (1995) that the Court confirmed this single standard of materiality exists and that the prosecution of the Court Appeals for the Third Circuit court has an obligation to disclose such favorable, material record evidence whether or not the defendant makes a request, whereat "Subject Judge" and or "Subject Judges" must disclose any contacting, communicating with the defense *ex parte* and financial transaction occurred in between defendant defendants or defense.

II. THE WRIT WILL BE IN AID OF THE COURT APPELLATE JURISDICTION

(18) ART. III, Section 2 of the Constitution vests appellate jurisdiction in the Supreme Court. Appellate jurisdiction refers to the power of a higher court to review and revise a lower courts decision. In this case the Court appellate jurisdiction is invoked to review the Third Circuit Court of Appeals order to dismiss TRANSFEROR-COURT, TRANSFEREE-COURT judicial misconduct and criminal violations in order purposeful to conceal corruption failure financial disclosure, and dismiss decision based on fraudulent falsification inexistence **"AFFIDAVIT FOR JUDICIAL DISCLOSURE AND OR DISQUALIFICATION, RECUSAL APPLICATION SUPPORT TO REMAND USDC-DDEL"** from the TRANSFEREE-COURT United States District Court for the Northern District Texas specifically In Re Tandys Ex Parte. The Court appellate jurisdiction is invoked pursuant to 28 U.S.C. §1651, the *All Writs Act*.

III. NO OTHER ADEQUATE MEANS TO OBTAIN RELIEF EXIST

(19) The Court Rule 20.1 mandates that to ensure that mandamus remains an extraordinary remedy, petitioner must show that they lack adequate alternative means to obtain the relief they seek (*See, e.g., Mallard vs. US Dist.*, 490 U.S. at 309).

(20) Petitioner has met this standard. That petitioner exhaustions substantial effort served no avail in between the TRANSFEROR-COURT and TRANSFEREE-COURT this chasing ghost judicial disclosure, whereat petitioners entitled due process regular appeals process subsequently been bared, deprived, altering, deleting, destroying, delete mutilate to the state inexistence by the subject judge, subject judges, subject judicial employee, subject none-judicial employees corruption preeminence to suppression or exemption the Third Circuit Court Appeal. The Fifth Circuit Court declines intervention the petition outlined judicial misconduct, that appeals court simplified its rejection as *"We are unable to determing[s] what relief you are seeking."* on the petitioner entitled *"Writ of Error Coram Nobis"* JPML petition (*See, e.g., APPENDIX-M, 5TH CIR.*, titled as *"deputy clerk"*, *"Christina A. Gardner"*, date 10-18-2024).

IV. A WRIT OF MANDAMUS IS WARRANTED UNDER THE CIRCUMSTANCE

(21) One of the express purposes of the writ of mandamus as delineated by the All Writs Act, is to compel an inferior court to "exercise its authority when is its duty to do so" (See, e.g., *Mallard vs. US Dist.*, 490 U.S. at 309). By failing to disclosure subject judges conflict interest in transaction, the Third Circuit has abdicated its duty, an act that is tantamount to a failure to exercise its jurisdiction proceeding judicial misconduct, disability, criminality which so provide empowerment by Congress. Under such circumstance, the Court intervention is necessary to ensure proper judicial administration of the public interest keystone in the federal system.

(22) Subject judge may preeminence such judicial power, that he can making any judicial transfer as pleased him; however there is only one circumstance applicability exceptions, that is at time petitioner have appropriately, respectfully, timely filed entitled "**AFFIDAVIT FOR JUDICIAL DISCLOSURE AND OR DISQUALIFICATION, RECUSAL APPLICATION SUPPORT TO REMAND USDC-DDEL**" mandate by statutory 28 U.S.C. §144, 455 and CANON-1, -2 of the United States Ethics and Judicial Conduct (also known as "*Code of Conduct for the United States Judges*") enforced compliance authorization codified on 5 U.S.C. §111, then the naming disclosure should-had-been appropriate complied without intentional delay-to-obstruct pattern in peculiar. Thus the circumstance question particularly the Third Circuit Court Appeal in the extension prosecutorial ethic on the subject judge violation defined by the 18 U.S.C. §666(a) said unlawful, whereat the Brady Rules must be warranted.

RELIEF SOUGHT

(23) (a) Order appeals court to Remand-Vacate-Reversal all decisions (APPENDIX-H, -I, -J, -K) and or that is in the any effect adverts to the affiant petitioner applicant claims relief to mandate "*Subject Judge*" and or "*Subject Judges*" must disclose any record contacting, communicating, transacting any interest including but not limiting financial interest in between defendant, defendants next of kin collectively defense attorneys in the Remand supplement to reference plaintiff affiant petitioner applicant "**AFFIDAVIT FOR JUDICIAL DISCLOSURE AND OR DISQUALIFICATION, RECUSAL APPLICATION SUPPORT TO REMAND**";

(b) Affirm to award plaintiff affiant petitioner applicant entitled default judgment entered each district court by dispense amount in reference to SARBANES-OXLEY ACT, DODD-FRANK ACT each mandate allowance in Order to vindicate public interest.

(c) Bifurcation *In Re: Tandys Ex Parte* before the Judicial Panel on the Multidistrict Litigation (MDL) for all ancillary;

CONCLUSION

(24) For the foregoing reasons, that affiant petition applicant respectfully request the Court issue a writ of mandamus directing its courts to issue all decision in favor this petitioner's decision.

MANDAMUS

The petition for a writ of ~~habeas corpus~~ should be granted.

Respectfully submitted,



Date: 03-07-2025

THIS IS END-PAGE

IN RE FLORA HOI
ON PETITION FOR A WRIT OF MANDAMUS

03-07-2025