

**In the Supreme Court of the United States**

**19-5405**

(INDEX NO.)

IN REVIEW OF:

DOCK. NO. 18cv12064(LLS)(SDNY), 19-1392(2<sup>ND</sup> CIR. CT.)

CESTUI QUE STEVEN TALBERT WILLIAMS

v.

UNITED STATES OF AMERICA

ON MOTION FOR LEAVE T

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**ON PETITION FOR LEAVE TO ARGUE**

STEVEN TALBERT WILLIAMS

*CESTUI QUE, Pro Se Litigant*

*(Currently Displaced)*

*Fitted Sole Productions, D.B.A. &*

*Fitted Fables, D.B.A.*

*(Previously addressed at: 449 E. 14<sup>th</sup> Street,  
Apt. 7d New York, N.Y. 10009)*

*Having Mail Temporarily Sent To:*

*AGVA NYC (In care of Steven Talbert Williams) 363 7th Ave. NYC 10001-1394*

*STWLEGAL@gmail.com*

**OCTOBER 9, 2019**

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CERTIFIED QUESTIONS

1. 28 USC 1915(e)(2)(B)(i) and 18 U.S.C. §402 (dismissal for “frivolous[ness];” U.S. Const. Am. 6, 10):
  - a. Whether the “ORDER” (Appendix A, dated March 22, 2019) of HON. LOUIS L. STANTON was unconstitutionally provided to delay trial and lache upon naming all defendants and exhibits? U.S. Const. Am. 6, 10; 18 U.S.C. §402.
  - b. Whether the “ORDER OF DISMISSAL” (“Dismissal,” Appendix B, Doc. “4” of Dock. No. 18cv12064(LLS)(SDNY); see Appendix X) of HON. STANTON, for “frivolous[ness]” (28 USC 1915(e)(2)(B)(i)), was unconstitutionally provided, and to issue sanctions for discriminatory and retaliatory contempt of court processes (18 U.S.C. §402), claimed to have induced a delay of trial and laches by the court to provide summonses to defendants after CHIEF J. HON. COLLEEN MCMAHON granted the In Forma (Doc. “6” of Dock. No. 18cv12064(LLS)(SDNY); Appendix C) under 28 USC 1915(e)(2)(B)(i) (a claim of postfiling delayed review, under Fed. R. Civ. P. 4(a). See Question 3)?
2. **J. Code 1.3 (C. 1)** (“[a] position to gain... differential treatment of any kind.”) (judicial estoppel, collateral and promissory, treasonous rebellion, under U.S. Const. Art. 3 §3, U.S. Const. Am. 5, 13 §3, 14 §§1, 4):
  - a. Was HON. STANTON’s Dismissal executed in aid of (18 U.S.C. §§2, 3) **UBS AG, Pershing, LLC** and **FMR** (“Fidelity,” formerly **Correspondent Services Corporation**) (as alleged financial institutions of PLAINTIFFS’ alleged custodial and irrevocable beneficial trust), as well as other securitized investments, including highlighted facts related to: (i) *District Attorney’s Office of New York County* (collaterally through the trial of *PEOPLE v. STEVEN WILLIAMS*, Dock. No. 2012NY089333(NYCC). U.S. Const. Am. 5, 14 §1); (ii) the *New York Police Department* officers of the *Metropolitan Transit Authority* (collaterally through trials of the *Transit Adjudication Bureau*. U.S. Const. Am. 5, 14 §1), who previously utilized the financial assets of the *New York State Department of Transportation*, the dwelling of 2 Rector Street, within the community of *Peter Cooper Village/Stuyvesant Town* (“PCV/ST”); (iii) the investments of **UBS AG** in **Pershing Square Holdings Group, LLC**’s Initial Public Offering; and (iv) the *Commercial Mortgage-Backed Security* investments of PCV/ST, **WACHOVIA BANK COMMERCIAL MORTGAGE TRUST 2007-C30** (claimed a conspired act to evict PLAINTIFF to rid the community of rent stabilized tenants in order to raise dwelling unit prices to market-rate values; a claimed act of Domestic Housing Terrorism. U.S. Const. Art. 3 §3; U.S. Const. Am. 14 §4), to further aid in subversion of PLAINTIFFS’ life within impoverishment (U.S. Const. Am. 13 §3); all executed to gain the non-pursuance of PLAINTIFFS’ redress within the federal court system, under **J. Code 1.3 (C. 1)**?
    - i. If so, will sanctions for contempt (18 U.S.C §402) be enforced against HON. STANTON for such an act?
3. **Fed. R. Civ. P. 4 and 28 U.S.C. §1915 (“postfiling delayed review”):** should a granted In Forma (Doc. “6” of Dock. No. 18cv12064(LLS)(SDNY); Appendix C) provide for authorization to proceed upon a complaint, and the issuance of summonses to defendants, which cannot be disregarded without examination of evidence (especially for antitrust claims)?
4. Validating antitrust claims (enforced under the **Sherman Antitrust Act** and **Clayton Act**):
  - a. Should PLAINTIFFS’ “COMPLAINT” (“Comp.”, Appendix D, Doc. “2” of Dock. No. 18cv12064(LLS)(SDNY), filed December 20, 2018) presenting claims under the **Sherman Antitrust Act** and **Clayton Act** be justifiable for the Court to enforce the standards of **Plausibility**, **Parallelism** and the alleged mandatory procedure to prove the **existence of a contract** (as delineated within the trials of *ASHCROFT v. IQBAL* (Matter of Iqbal), 556 U.S. 678 (2002), *BELL ATLANTIC CORP. v. TWOMBLY* (“Matter of Twombly”), 550 U.S. 544, 555 (2007) (“[a] reasonable expectation that discovery will reveal evidence of an illegal agreement[ (“*Id. at 1965*”),]” Matter of Iqbal citing Matter of Twombly) and *ERICKSON v. PARDUS*, 127 S. Ct. 2197 (2007)) and should such claims be a common procedure of the judicial government for proving antitrust offenses?
    - i. If so, will sanctions for contempt (18 U.S.C §402) be enforced against HON. STANTON for laching upon a pursuit to seek evidence of a contract under Fed. R. Civ. P. 16 or Fed. R. Civ. P. 26?



In re.: *Cestui Que Steven Talbert Williams v. United States, et al.*, Docket No. 18cv12064(LLS)(SDNY), 19-1392(2<sup>nd</sup> Cir. Ct.), 19-5405(U.S. S.Ct.) 3

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5. 28 U.S.C. §1927:

a. If sanctions are enforced against HON. STANTON for an unconstitutional dismissal, and antitrust claims are proven to have been escheated, should such provide for the enforcement of additional sanctions under 28 U.S.C. §1927?

6. U.S. Const. Am. 1, 5, 14 §1 and 18 U.S.C. §§241, 371, 1001(a):

a. Should S.D.N.Y.'s PRO SÉ INTAKE UNIT's personal classification of PLAINTIFFS' Comp.'s case type as "440 Civil Rights" (evidenced on the "CIVIL DOCKET." *Id.* at p.1; Appendices E and AA; filed by S.D.N.Y.'s Pro Sé Intake Unit's "rdz" and "sc") be seen as unconstitutional (under U.S. Const. Am. 1, 5, 14 §1 and 18 U.S.C. §§241, 371, 1001(a)), when PLAINTIFF factually stated the matter concerned the Sherman Antitrust Act and Clayton Act within the Comp. and "NATURE OF SUIT & DIVERSITY OF CITIZENSHIP" (Doc "3" of Dock. No. 18cv12064(LLS)(SDNY); Appendix F)?

i. If so, will sanctions for contempt (18 U.S.C §402) be enforced against the employees of S.D.N.Y. for such an act?

7. U.S. Const. Am. 5, 14 §1; 18 U.S.C. §§241, 371, 1513; 44 U.S.C. §§3507(e)(3)(B), 3512:

a. Are the actions by HON. STANTON to provide an dismissal be seen as retaliatory promissory and collateral discriminatory judicial estoppel (under U.S. Const. Am. 5, 14 §1; 18 U.S.C. §§241, 371, 1513; 44 U.S.C. §§3507(e)(3)(B), 3512); collaterally associated to the trials of: *CESTUI QUE STEVEN TALBERT WILLIAMS v. UNITED STATES, ET AL.*, 15-cv-5114(LAP)(SDNY), 16-189cv(ALK)(DJ)(BDP)(2nd Cir. Ct), 137 U.S. 1611(No. 16M111, 2017); *Estate of Linda Paula Streger Williams*, File No. 2013-3538(SCNY); *PEOPLE v. STEVEN WILLIAMS*, Dock. No. 2012NY089333(NYCC); *MARYLAND v. WILLIAMS, STEVEN T.*, No. ID00283543 (M.C. Dist.Ct., 2012); and *ST OWNER LP v. EUGENE WILLIAMS*, Index No. 52069/12(Chan)(JHS)(NYHC)?

i. If so, will sanctions for contempt (18 U.S.C §402) be enforced against the employees of S.D.N.Y. for such an act?

8. U.S. Const. Art. 3 and the "*pendent jurisdiction*" rule):

a. Should PLAINTIFFS' claims involving collateral estoppel from circuit courts of New York State (namely: *Estate of Linda Paula Streger Williams*, File No. 2013-3538(SCNY); *PEOPLE v. STEVEN WILLIAMS*, Dock. No. 2012NY089333(NYCC); and *ST OWNER LP v. EUGENE WILLIAMS*, Index No. 52069/12(Chan)(JHS)(NYHC)) be jurisdictionally enforced within the Federal Courts under U.S. Const. Art. 3 and the "*pendent jurisdiction*" rule?

i. If so, will sanctions for contempt (18 U.S.C §402) be enforced against the employees of S.D.N.Y. for such an act?

ii. Alternatively, U.S. Const. Art. 3 §3; U.S. Const. Am. 14 §4, are questioned for whether named defendants of this certiorari aided in antitrust offenses (under 18 U.S.C. §§2, 3) upon validation of claims of PLAINTIFFS' driver's license and Mrs. Linda Paula Streger Williams (PLAINTIFF's mother's) Social Security Numbers being allegedly exposed to the public by the local and federal court system (a matter of national security if his alleged trust's funds were utilized to fund of terrorist organizations)?

iii. Further, upon validation of aiding antitrust claims as accessories after the fact (see subdivision (ii) above), will the Court provide for further questioning upon Fed. R. App. P. 27, L.R. 27(d), (g), (i) and L.R. 40.2 of the *Local Rules and Internal Operating Procedures of the Court of Appeals for the Second Circuit*, local statute 22 NYCRR 500.20(d) (for collateral claims of pendent jurisdiction), the recently provided dismissals of *CESTUI QUE STEVEN TALBERT WILLIAMS v. UNITED STATES, ET AL.*, 18cv12064(LLS)(SDNY), 19-39(JAC)(PWH)(JMW)(2<sup>nd</sup> Cir. Ct.) and *CESTUI QUE STEVEN TALBERT WILLIAMS v. UNITED STATES, ET AL.*, 18cv12064(LLS)(SDNY), 19-240(JAC)(PWH)(JMW)(2<sup>nd</sup> Cir. Ct.) (see Appendices G, H and I. U.S. S.Ct. Rule 14.1(i)(vii)) and what delineates "*an adequate, alternative mean[ ] of obtaining relief*" when judicial officials cite "*Cheney v. U.S. Dist. Ct. for D.C.*, 542 U.S. 367, 380-81 (2004)" for a reason to dismiss reconsideration motions?

A. Upon affirmation of a justified reconsideration by PLAINTIFF (see Appendix I. U.S. S.Ct. Rule 14.1(i)(vi)), will the Court see just to provide a *sua sponte* order to reopen the above trials (Dock. Nos. 19-39 and 19-240), by writ of error, in question of Fed. R. Civ. P. 60?



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9. **Fed. R. Crim. P. 60(b) and 28 C.F.R. Part 0, Subpart K** (*Scott Campbell, Stephanie Roper, Wendy Preston, Louarna Gillis, and Nila Lynn Crime Victims' Rights Act*):

- Should PLAINTIFFS' antitrust claims have provided for immediate adjudication, under the doctrines of plausibility, parallelism and proof of a contract for being reported as a crime victim (under **Fed. R. Crim. P. 60(b) and 28 C.F.R. Part 0, Subpart K**), due PLAINTIFF providing proof of account information of the "Mrs. Linda Paula Streger Williams' (Decedents) Individual Retirement Acct. (IRA) trust (Pershing, LLC & UBS Acct.#: x7439 – EIN#: x8899 – Treas. (IRS) form SS-4#: x6766 and evidence of a W-9 form)" (Comp. at 5)?
  - If so, will sanctions for contempt (18 U.S.C §402) be enforced against the employees of S.D.N.Y. for such an act?

10. **Fed. R. Civ. P. 5(d)(4) and 18 U.S.C §402 (U.S. Const. Am. 1; U.S. Const. Am. 10; U.S. Const. Am. 13 §3; 18 U.S.C. §§2, 3):**

- Were PLAINTIFFS' "Motion For Fed. R. Civ. P. 60(a), (b)(1) to (b)(6), (d)(1) to (d)(3) (Coram Nobis/Coram Vobis): *Cestui Que Steven Talbert Williams v. United States*, 137 U.S. S.Ct. 1611(2017) (15 U.S.C. §26; Fed. R. Civ. P. 5(d); 5 U.S.C. §§552(b)(7), 552a(l)(1); 49 U.S.C. §30301(d)(7))" (Appendix J. U.S. S.Ct. Rule 14.1(i)(vi)) hidden in the filings of Doc. "8" of Dock. No. 18cv12064(LLS)(SDNY) in opposition of **Fed. R. Civ. P. 5(d)(4)**, and, if so, will sanctions for contempt (18 U.S.C §402) and advocacy offense (U.S. Const. Am. 1; U.S. Const. Am. 13 §3; 18 U.S.C. §§2, 3) be enforced against the employees of S.D.N.Y. for such an act?
  - If so, will sanctions for contempt (18 U.S.C §402 and U.S. Const. Am. 10) be enforced against the employees of S.D.N.Y. for such an act?

11. **Fed. R. Civ. P. 5(d)(4), Fed. R. Crim. P. 42 and 18 U.S.C §402 (U.S. Const. Am. 1; U.S. Const. Am. 10; U.S. Const. Am. 13 §3; 18 U.S.C. §§2, 3):**

- Were PLAINTIFFS' two documents of a "Petition For Permission To Appeal To The United States Supreme Court" (Appendix K) and "Affidavit In Support Of Complaint, Part IV" (Appendix L) missing from the filings of 18cv12064(LLS)(SDNY) in opposition of **Fed. R. Civ. P. 5(d)(4)** and **Fed. R. Crim. P. 42**, and, if so, will sanctions for contempt (18 U.S.C §402 and U.S. Const. Am. 10) and advocacy offense (U.S. Const. Am. 1; U.S. Const. Am. 13 §3; 18 U.S.C. §§2, 3) be enforced against the employees of S.D.N.Y. for such an act?

12. **Fed. R. App. P. 3(b)(2) ("separate timely notices of [ap]peal, the appeals may be joined or consolidated by the court of appeals"), 18 U.S.C §402 and U.S. Const. Am. 10:**

- Was PLAINTIFF denied the right to file two notices of an appeal under **Fed. R. App. P. 3(b)(2)**, where one appeal was allegedly sought for a class action remedy (see the CIVIL DOCKET's "Appeal Remark as to 8 Notice of Appeal... (tp) (Entered: 01/03/2019); Appendix M)?
  - If so, will sanctions for contempt (18 U.S.C §402 and U.S. Const. Am. 10) be enforced against the employees of S.D.N.Y. for such an act?

13. **U.S. Const. Art. 1 §8 Cl. 7 (postal fraud); U.S. Const. Am. 1, 4, 6, 10; 18 U.S.C. §1001(a) and 18 U.S.C §402 (U.S. Const. Am. 1; U.S. Const. Am. 13 §3; 18 U.S.C. §§2, 3):**

- Was PLAINTIFFS' federal mail for Dock. No. 18cv12064(LLS)(SDNY) sent to "General Delivery Services 333 1st Avenue NY, NY 10003" (see the CIVIL DOCKET note, "(Entered: 12/27/2018)," by "aea;" Appendix N) (the address to a trucking company, no longer in service, however, across the street from the community of PCV/ST) and not to the U.S.P.S.'s "General Delivery" office in a conspired discriminatory and retaliatory manner of contempt (18 U.S.C §402) and postal fraud (U.S. Const. Art. 1 §8 Cl. 7) to deprive PLAINTIFF of his requested right to receive federal mail of the court and to falsify information (under 18 U.S.C. §1001(a)) in order to delay trial under U.S. Const. Am. 1, 4 and 6?
  - If so, will sanctions for contempt (18 U.S.C §402 and U.S. Const. Am. 10) be enforced against the employees of S.D.N.Y. for such an act?



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ii. Furthermore, was such above act to send federal mail from the District Court to an address not "normally" used by the Court for pro sé litigants without a stable dwelling in aid of antitrust offenses (under 18 U.S.C. §§2, 3, U.S. Const. Art. 3 §3 and U.S. Const. Am. 14 §4)?

14. **Fed. R. Civ. P. 3** and **Fed. R. Crim. P. 3**, seeking a revising of the federal rules:

- Should federal courts provide a response to a filed complaint within a fourteen (14) day period? See "Exhibit 46" [highlighting omitted] of the forthcoming "*Motion For Injunctive Relief Sanctions Upon Hon. Louis L. Stanton & Pro Sé Intake Unit*" [highlighting omitted] ("Injunction," previously filed within Dock. No. 19-1392(2nd Cir. Ct.), entitled "*Slip Law Draft Of Federal Rules Of Civil Procedure, Rule 3.1, By Cestui Que Steven Talbert Williams*" [highlighting omitted] (see Appendix O).

15. **Fed. R. Civ. P. 12(e), (f)(1)**

- Should the "STRIKE ORDER" (Doc. "104" of Dock. No. 19-1392(2<sup>nd</sup> Cir. Ct.) (Appendix P), striking the filing of the Injunction and other supporting documents (including PLAINTIFF's "*Letter To Chief Clerk Ms./Mrs. Kathleen O'Hagan: Validation Of Filing An Affidavit (Doc. 82)*," Doc. "88" of Dock. No. 19-1392(2<sup>nd</sup> Cir. Ct.) (Appendix Q) and "*Motion To Strike Defectiveness (Doc. 84)*" Doc. "89-1" of Dock. No. 19-1392(2<sup>nd</sup> Cir. Ct.) (Appendix R) (both filed on June 3, 2019, prior to the Appellate Court requesting clarification of PLAINTIFF's strike motion, and again on June 10, 2019 (see PLAINTIFF's "*CERTIFICATE OF SERVICE*" for June 10, 2019, Doc. "98-1" of Dock. No. 19-1392(2<sup>nd</sup> Cir. Ct.); Appendix S. U.S. S.Ct. Rule 14.1(i)(vi))), have been provided, whether or not enforced under **Fed. R. Civ. P. 12(e)** or **Fed. R. Civ. P. 12(f)(1)**?

16. **U.S. Const. Art. 1 §8 Cl. 17; U.S. Const. Art. 1 §10, 6 §2; U.S. Const. Am. 11; Fed. R. Civ. P. 11; Fed. R. Civ. P. 54; Fed. R. Civ. P. 65; 48 C.F.R. §2815; 28 U.S.C. §651, et seq.; 5 U.S.C. §555(b); The Adequate Remedy Rule; and Economic Benefit Doctrine** (in coordination with seeking waiver of immunity via mandamus, as a "preliminary" semi-safe harbor, or quasi-public good), seeking a revising to constitutional laws and acts of Congress:

- Should revising to constitutional laws and acts of Congress commence to establish a new doctrine to allow a U.S. citizen to obtain sovereign immunity through a settlement, structured or qualified, as such may additionally benefit the U.S. Government not only economically (as a party of interest to a contractual agreement, or treaty), but for society as a whole? See Injunction at "Exhibit 45," [highlighting omitted] an "*Act to Immunize an Individual from Tax liability within Sovereignty*" (shortened title: "*Individual Tax Immunity Act*") (Appendix T).

17. Seeking a revising to **42 U.S.C. §2000d** and **Titles VI and VII of the Civil Rights Act of 1964**, as amended (specifically §601):

- Should a revising to **42 U.S.C. §2000d, Titles VI and VII of the Civil Rights Act of 1964** and other constitutional laws and acts of Congress commence to include the term "socioeconomic status" or "economic status" and to review the establishment of an act of Congress for "*Deprived Economic Status*" (see Appendix U, entitled "*Slip Law Proposal: Deprived Economic Status*")?

18. **The Declaratory Judgment Act**, 28 U.S.C. §§ 2201-2202 (seeking a sua sponte 28 U.S.C. §1296(b) motion):

- Whether a vacate is justified for a dismissal provided after a granted In Forma and before summonses or acquiring supporting documentation and evidence under **The Declaratory Judgment Act**, 28 U.S.C. §§ 2201-2202? See a forthcoming "*Motion To Vacate Dismissal Order Of Hon. Lois L. Stanton, In Re.: Cestui Que Steven Talbert Williams v. United States, 18cv12064(LLS)(SDNY)*."



## PARTIES

### PLAINTIFF

1. **CESTUI QUE STEVEN TALBERT WILLIAMS** ("PLAINTIFF," Pro Se):
  - a. (Last known residence)  
449 E. 14<sup>th</sup> St. Apt. 7d  
New York, NY 10009
  - b. (Currently Displaced)  
AGVA NYC (In Care of PLAINTIFF)  
363 7<sup>th</sup> Ave., 17 Fl. NYC 10001-3904

### PRIMARY DEFENDANTS

2. **UNITED STATES DEPARTMENT OF JUSTICE** ("U.S.D.O.J."):
  - a. **UNITED STATES ATTORNEY GENERAL** ("U.S.A.G."):  
(28 U.S.C. §§503, 515(a); 28 C.F.R. §0.5):
    - i. **MR. WILLIAM PELHAM BARR**  
950 Pennsylvania Avenue, NW Washington, DC 20530-0001 (tel.: (202) 514-2000)
  - b. **NEW YORK STATE ATTORNEY GENERAL** ("N.Y.A.G."):
    - i. **MS./MRS. LETITIA JAMES**  
Office of N.Y.A.G., The Capitol Albany, NY 12224-0341 (tel.: (518) 776-2000)
  - c. **SOUTHERN DISTRICT COURT OF THE STATE OF NEW YORK** ("S.D.N.Y.") (including ASSIGNMENT COMMITTEE or ADMINISTRATIVE APPOINTEE):
    - i. **HON. CHIEF J. COLLEEN MCMAHON**  
500 Pearl Street NY, NY 10007  
(tel: (212) 805-0136)
    - ii. **HON. LOUIS L. STANTON**  
(address unknown)
    - iii. **PRO SÉ INTAKE UNIT**  
500 Pearl Street, Rm. 200 NY, NY 10007 (Temp. at 40 Foley Sq., stated above) (namely docketing clerks, evidenced on the CIVIL DOCKET of Dock. No. 18cv12064(LLS)(SDNY), "rdz[... ]mro[... ]tp[...]aea[... and]rjm" [highlighting and emphasis added] and other filing clerks, determined upon investigation of the Fed. R. Civ. P. 60 motion (Exhibit 1) by the PRO SÉ INTAKE UNIT, stamped on January 2, 2019; as such may be in relation to a replacement title page for the aforementioned evidenced filing on January 3, 2019, docketed by "sc." [highlighting and emphasis added]).

### STATEMENT BASED UPON JURISDICTION

3. Jurisdiction, enforced primarily under U.S. Const. Art. 3 §2 Cl. 1 and U.S. S.Ct Rule 44.

### APPENDIX

APPENDIX A – **HON. STANTON's "ORDER"** (Doc "20" of Dock. No. 18cv12064(LLS)(SDNY))

APPENDIX B – **PLAINTIFFS' "COMPLAINT"** (Doc. "2" of Dock. No. 18cv12064(LLS)(SDNY), filed Dec. 20, 2018).

APPENDIX C – The "**LINDA WILLIAMS BENEFICIAL TRUST**" Testamentary Agreement (highlighted pages) with **DECEDENT's (Linda Paula Streger Williams') Individual Retirement Account** Agreement (originally within "*Exhibit 3*" of the oversized Supplemental Brief (Injunction), delivered for filing to the U.S. S.Ct. on August 28, 2019).



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APPENDIX D – *U.S. Department of Treasury* (registration of trust, dated September 15, 2001), *Internal Revenue Service* (a W-9 and SS-4 form filing) and with the financial institution of *Correspondent Services Corporation* (now FMR, “Fidelity”) of the trust’s Employer Identification Number (originally within “*Exhibit 3*” of the oversized Supplemental Brief (Injunction), delivered for filing to the U.S. S.Ct. on August 28, 2019).

APPENDIX E – Email response from *Federal Depository & Insur. Corp.*’s secure website to **PLAINTIFF** (originally within “*Exhibit 3*” of the oversized Supp. Brief (Injunction), delivered for filing to the U.S. S.Ct. on August 28, 2019).

APPENDIX F – Renewed Application to **Hon. Ruth Bader Ginsberg** for five (5) Supplemental Briefs (15 pages), sought for filing on October 8, 2019.

APPENDIX G – “*Supplemental Brief (Rule 15.8): U.S.D.O.J., Hon. Louis L. Stanton & Pro Se Intake Unit, S.D.N.Y. (18 U.S.C. §§2, 3)*”

APPENDIX H – “*Supplemental Brief: Supplemental Questions (Rule 12.6, 12.7 & Rule 15.3)*”

APPENDIX I – “*Supplemental Brief (Rule 15.8): Homelessness: A Hazardous Threat To Life (Judicial Review Of Experimental Nano-Biotechnology & Nano-Robotics, In Situ Drug Delivery; A Public Concern)*” (new questions)

APPENDIX J – “*Supplemental Brief (Rule 15.8): Highlighted Injunctive Motion In Anticipation Of Summary Judgment*” (containing most exhibits of the trial – originally delivered for filing to the U.S. S.Ct. on August 28, 2019, accompanied with an application to **Hon. Ruth Bader Ginsberg**, under U.S. S.Ct. Rules 15.8, 18.10, 21.1, 22, 33.1(d), 33.2(b), denied for being oversized).

APPENDIX K – “*Supplemental Brief (Rule 15.8): Sovereignty of Cestui Que Steven Talbert Williams*”

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## CITATIONS

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1. “*ORDER*” (Appendix G):
  - a. “*On December 26, 2018, the Court dismissed the complaint as frivolous under 28 U.S.C. §1915(e)(2)(B)(i). Plaintiff as filed a notice of appeal and numerous post-judgment motions[ (“The appeal is pending as Williams v. United States, No. 19-0039 (2d Cir.). Plaintiff also brought a petition for a writ of mandamus, which has been opened... as Williams v. United States, No. 19-0240-op (2d Cir.’).]”* *Id.* at 1.
  - b. “*Plaintiff has filed two substantially similar actions in this Court[,]... this action and Williams v. United States, No. 15-CV-5114(LAP)(SDNY Dec. 10, 2015)[ (“On direct appeal from the order of dismissal for failure to state a claim in Williams, No. 15-CV-5114(LAP)[;... Williams v. United States, No. 16-189-cv (2d Cir. May 15, 2016’)]”* [emphasis added] *Id.*; and
  - c. “*Plaintiff’s allegations... can be summarized as[:]... After his mother died in 2010, Plaintiff was wrongfully denied assets of her estate, and was evicted from her rent-controlled apartment in Stuyvesant Town in Manhattan while ownership of the building was changing hands;... Plaintiff’s allegations are unintelligible and fail to state a claim on which relief can be granted; and this Court cannot overturn the decisions of state courts or other federal courts.’).]”* [emphasis added]



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2. COMPLAINT:

a. "U.S. Const. Art. 1 §8 Cl. 17, 1 §10,3 §3, 6 §3; U.S. Const. Am. 1, 4, 5, 6, 7, 8, 10, 13 §3, 14 §1, 14 §4, 16, 26 §1; *Habeas Corpus* (28 USC §2241[ and 28 U.S.C. §2255(e)]); *Clayton Act (1914); Sherman Antitrust Act (1980); Economic Espionage Act (1996); RICO; Dodd-Frank Act (2010); Rent Stabilization Act (1969);... a ruling on *prima facie evidence*.)" [emphasis added] *Id.* at "Page 2."*

b. " \* *Primary Action is brought against the United States due to an alleged co-conspired infiltration and influence within the IRS (to conceal tax documents and other information of Mrs. Linda Paula Streger Williams' (Decedents) Individual Retirement Acct. (IRA) trust (Pershing, LLC & UBS Acct. # x7439 - EIN #: x8899 - Treas. (IRS) form SS-4#: x6766 and evidence of a W-9 form) and other claims)... (including the SSA).*

" \* [S.D.N.Y.] is named a defendant[,] creating a *conflict of interest for jurisdiction*[,... warranting... reopening of trial # 15-cv-5114(LAP) (SDNY)[,... the original complaint... enforced under 15 USC §26.

" \* *Claimed factual events and evidence (including new evidence of Pershing Sq. Hldg. Grp., LLC's Initial Public Offering, evidencing UBS AG and BNY (Pershing LLC) reinvesting assets within the mortgaged trusts of Peter Cooper Village/Stuyvesant Town (PCV/ST) [ ]Apt. 7D of Building 449 E. 14th Street[,] includ[e] claims of:*

- (1) *Decedents' legal representative, Mr. Avrom R. Vann's neglect to provide Plaintiff access to assets[ ] in an 'irrevocable' testamentary 'BENEFICIAL TRUST' (Trust LPSW) upon his custodial age of 30 yrs. Old;*
- (2) *FDIC's validation of assets within Trust LPSW;...*
- (4) *CWCAM's neglect to provide Plaintiff or Mr. Williams, Jr. a renewal lease after the death of Decedent; [and]...*
- (5) *StateFarm Renters Insur. #: x7212-5[]);*

"Such is further claimed to be an alleged *co-conspired antitrust and racketeering mortgage scheme* (through CMBS, CDOs, DIL auctions, dark pool investments and staged judicial proceeding;... namely [under] U.S. Const. Am. 1, 4, 5, 8, 10, 13 §1, 14 §1, 14 §4,... *where §10(b) and §13 of the SEC Act of 1934, Clayton Act (Sherman Act), Security Act of 1933 (as amended), Sarbanes Oxley Act (2002), as well as the Dodd-Frank Act of 2010 are highlighted*), perpetrated, as claimed, to illegally reinvest into securitized investments of Decedents' IRA, as well as the claimed *prejudicial removal of rent stabilized tenants to eliminate PCV/ST's tax exemption status in exchange for greater return on market-valued apartments* and to create an opportunity to convert the community of PCV/ST into cooperative or condominium housing, while *implementing a series of organized enterprise corruption and economic espionage schemes to deter Plaintiffs' acquisition of Trust LPSW's assets* (including an alleged inducing of a criminal record... [and the] use of public servants[, for] whom [ ] financial institutions [have ]control [over their] pensioned assets [ ]... [and] *enslav[e ]him within impoverishment, via subversion* (equivalent to that of *attempted murder*)[;] further utilizing means of internet intrusion and other deceptive acts to accomplish such endeavors." [emphasis added] *Id.* at "Page 5" to "Page 6."



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SUPREME COURT

OF THE UNITED STATES

CESTUI QUE STEVEN TALBERT WILLIAMS

(SON OF LINDA PAULA STREGER WILLIAMS;  
SON OF WILLIS EUGENE WILLIAMS)

PLAINTIFF

Steven Talbert Williams, PRO SÉ

AGVA 363 7th Ave., 17th Fl. NYC 10001-3904

PETITION FOR  
REHEARING

v.

UNITED STATES OF AMERICA, et al  
DEFENDANT

Docket #: 19-5405  
Date: October 8, 2019

Clerk's Office: One First St. Washington, D.C. 20543

PETITION FOR REHEARING

I, CESTUI QUE STEVEN TALBERT WILLIAMS, "PLAINTIFF," Pro Sé, being of sound mind, state I am over the age of 18 (currently displaced), and in reference to the denied "PETITION FOR CERTIORARI" ("Petition," denied on October 8, 2019), petitions the Supreme Court of the United States ("U.S. S.Ct.") to rehear the Petition based upon alleged *prima facie* evidence of constitutional illegalities of sanctions for aiding/abetting antitrust offenses, evidenced in the accompanying appendices. U.S. S.Ct. Rule 44 (presented in good faith for "*intervening circumstances*"); Fed. R. App. P. 15(a), 20, 40(a), 41(d); Fed. R. Crim. P. 51(b); Fed. R. Civ. P. 60(b). See *UNITED STATES v. ALLEN-BRADLEY CO.*, 352 U. S. 306. See also *NATIONAL LEAD CO. v. COMMISSIONER*, 352 U. S. 313. See also *UNITED STATES v. OHIO POWER CO.*, 353 U. S. 98-99. See also a Villanova University publication,<sup>1</sup> where such suggests the procedure is to recall prior to mandate, a "*balancing [of] interests*" between the recall and rehearing petition (by "*reexamination or alteration*" when a filing party feels as though the Court "*misapplied or overlooked an issue of law*"), as such would quash its ruling and recall the matter for an additional consideration, "*because the correction of such errors is considered the primary purpose of petitions for rehearing*," where the publication further states:

"[a] petition for rehearing will usually stay... the mandate... Neither the Federal Rules of Appellate Procedure nor the Judicial Code[ ] provides for any reexamination or alteration of an issued mandate, which becomes the law of the case.[ ] A litigant... may move for that court to recall its mandate... because the correction of such errors is considered the primary purpose of petitions for rehearing[...]" *Id.* at 1, 3, 7.

The Villanova publication seeks to validate the procedure of a motion to recall within a superior court, citing such stipulating:

"[n]o statute,... has been enacted to aid courts of appeals in balancing these interests when they are requested to recall their mandates,... See *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238, 244 (1944); *Greater Boston Television Corp. v.*

FOOTNOTE 1: See a Villanova University publication, entitled "Federal Appellate Procedure – Recall of Mandate Review of Judgments after Rehearing and Appeal Periods Expire" (Vol. 24, Issue 1, Art. 9) (by Steven D. McLamb, dated January 1, 1978).

Source: "<http://digitalcommons.law.villanova.edu/cgi/viewcontent.cgi?article=2214&context=vlr>."



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*FCC, [2] 463 F.2d 263, 277-78 (D.C. Cir. 1971), cert. denied, 406 U.S. 950 (1972); Hines v. Royal Indem. Co., 253 F.2d 111, 114 (6th Cir. 1958)... Neither the Federal Rules of Appellate Procedure nor the Judicial Code 19 provides for any reexamination or alteration of a[ ]mandate[ (see 'In re Sanford Fork & Tool Co., 160 U.S. 247, 255 (1895)'),... where a] litigant who believes [ ] the court [ ] has misapplied or overlooked an issue of law may move for... recall[.]*" [emphasis added] *Id.* 1, 3.

The Villanova publication states:

*"courts... possess the power to recall issued mandates... See *United States v. Ohio Power Co.*, 353 U.S. 98 (1957)[. See also] *Marine Ins. Co. of Alexandria v. Hodgson*, 11 U.S. (7 Cranch) 332 (1813)[, wherein]... mandate could be recalled... only upon a clear showing of fraud or unconscionable result. 11 U.S. (7 Cranch) at 337."* [emphasis added] *Id.* at 4.

The Villanova, quoting 28 U.S.C. "...[§]2106[... further states,] federal [ ] courts may, inter alia, require such further proceedings to be had as may be just under the circumstances." [emphasis added] *Id.* Additionally, the publication states:

*"the Third Circuit substantially contributed to the development of this area of law in *American Iron and Steel Institute v. Environmental Protection Agency (AISI II)*[ ('560 F.2d 589 (3d Cir. 1977).'),]... in light of the conflicting policies of finality of judgment and reopening litigation where justice so [re]quires[,... and whereby t]he Fifth Circuit has sought to answer this question through its rulemaking power[ (referencing '28 U.S.C. § 2071 (1970); FED. R. App. P. 47.'), f]or a discussion of providing that '[a] mandate once issued will not be recalled except by the court and to prevent injustice[ ('5TH CIR. R. 15. See *Gradsky v. United States*, 376 F.2d 993, 995 (5th Cir.), vacated... *Roberts v. United States*, 389 U.S. 18 (1967). *Gradsky* was decided under a rule... to follow Federal Rule of Civil Procedure 60(b)(6), which states that a judgment entered in district court may be vacated by that court for any reason 'justifying relief from the operation of the judgment."* [emphasis added] *Id.* at 4, 5.

The Villanova publication, referencing Fed. R. Civ. P. 60(b) and the matter of "Greater Boston," states, the:

*"court contributed two new factors... First, recall would be justified where significant evidence has been discovered after the [ ] mandate has issued[,... and s]econd,... that recall of mandates may be warranted where there is an interest in intracircuit uniformity[.]*" [emphasis added] *Id.* at 6.

Villanova highlights "*Legate v. Maloney*, [ ('348 F.2d 164 (1st Cir. 1965).')," wherein:

FOOTNOTE 2: See Villanova's citation of the matter of "...Greater Boston[ (463 F.2d at 274), wherein] the FCC petitioned the court to recall its mandate... in order to reopen its proceedings and receive new evidence[, and where the] court summarized the scant precedent on the recall of mandates[,... not[ing] that mandates had been traditionally recalled if the[y]... would have produced an unintended[ ('...the mandate must be changed... 463 F.2d at 279. See *Meredith v. Fair*, 306 F.2d 374 (5th Cir. 1962) (sua sponte recall).] or unconscionable result.43" [emphasis added] *Id.* at 5, 6.

a. Footnote "43" of the publication, referencing "463 F.2d at 279," "[t]he court set forth this exception as follows: If a case involves the kind of injustice that would support an independent suit in the trial court [pursuant to FED. R. Civ. P. 60(b)], but presents an instance where action is needed[,... the remedy of recall... may well be appropriate."



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"the... court stated in dicta that if a subsequent... opinion were to show that the original opinion was 'demonstrably wrong,' a motion to recall that mandate might be entertained[,'... and] that even if an error of law had been made, 'we believe it would be far greater error to permit reconsideration now after denial of petitions for rehearing..." [emphasis added] *Id.* at 7.

Such "balancing," he adds, is further advised by Villanova, as proper procedure, to: "adopt the balancing approach advanced by the Third Circuit[,... where t]he diligence of the litigant in moving for a rehearing... should be considered, and the litigant's diligence in moving for the recall should also enter into the balancing process." See "*American Iron and Steel Institute v. Environmental Protection Agency (AISI I)*," 526 F.2d 1027 (3d Cir. 1975). See also AISI II, "argued June 9, 1977. 560 F.2d at 589." [emphasis added] Villanova, *Id.* at 10.

Further citing Villanova, he emphasizes the publications reference to:

"AISI II[,... wherein] the issue of whether the policy interests favoring putting an end to litigation were so outweighed by the circumstances of the case as to warrant an extraordinary recall of mandate,... [stating] that the case fit within the Legate 'demonstrably wrong' exception to the recall prohibition[ ('560 F.2d at 595.'),... as such] a refusal to recall its mandate would impose substantial administrative hardship...[ ('560 F.2d at 600')]." Villanova, *Id.* at 10, 11.

Villanova compares "Greater Boston" to "AISI II," concluding, within Greater Boston, "the D.C. Circuit did not provide any guidance to courts or litigants as to whether the presence of one or several factors was necessary to warrant recall[,']" and that it was in the publication's opinion "that [ ] courts confronted with a motion to recall a mandate should adopt the balancing approach advanced by the Third Circuit in AISI II." [emphasis added] Villanova, *Id.* at 12. Villanova concluded, stating that:

"[w]ith respect to fairness to the litigants, certain factors should be weighed[,... such as t]he diligence of the litigant in moving for a rehearing... and the litigant's diligence in moving for the recall... enter[ing such] into a balancing process..."

"[T]he court should examine the [ex]tent to which a party who has relied on the judgment would be injured by its recall[ ('See *United States v. Ohio Power Co.*, 353 U.S. 98, 99 (1957) (Harlan, J., dissenting);...')], as well as... any abuse of the judicial process... [and] the interest of society in finality of judgment and in the outcome of a particular suit, as well as the degree its expectations would be upset by recall of a mandate, must be considered." [emphasis added] Villanova, *Id.* at 13.

## PART A - BILL OF PARTICULARS

1. In light of having to validate this motion as being in direct relationship to a rehearing petition, PLAINTIFF concludes, the *prima facie* evidence should be examined further to determine a dismissal of the trial, allegedly warranting rehearing; as such "...judgment... may be vacated... for any reason 'justifying relief



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*from the operation of the judgment[,'... and wherein]recall... [is] justified*

[through]... *significant evidence*... discovered[.]” Villanova, *Id.* at 4 to 6. See footnote “3” of Villanova, referencing Fed. R. Civ. P. 60(b) “enumerat[ing] the various grounds upon which relief from [judg]ments may be granted[,]” (*Id.* at 1) stating that upon a motion:

*“the court may relieve a party or his legal representative from a final judgment[ or] order,... for the following reasons:... (2) newly discovered evidence which by due diligence could not have been discovered in time to move for a new trial under Rule 59(b);... or (6) any other reason justifying relief from the operation of the judgment.”* [emphasis added] *Id.*

### **PART A.1 – PRIMA FACIE EVIDENCE WARRANTING REHEARING**

1. The “ORDER” (Doc “20” of Dock. No.18cv12064(LLS)(SDNY), Appendix A) sought for review was issued on March 22, 2019.
2. This matter was specifically filed as a mandated sanctions action against the U.S.D.O.J., HON. CHIEF JUDGE COLLEEN MCMAHON, HON. LOUIS L. STANTON and employees of the SOUTHERN DISTRICT COURT OF THE STATE OF NEW YORK’s (“S.D.N.Y.”) PRO SÉ INTAKE UNIT where PLAINTIFF originally filed his “COMPLAINT” (“COMP.”, Doc. “2” of Dock. No. 18cv12064 (LLS)(SDNY), filed December 20, 2018, Appendix B) as an anti-trust matter and misclassified by the Clerks of the District Court as a civil rights matter. See COMP. at 2:

*“U.S. Const. Art. 1 §8 Cl. 17, 1 §10,3 §3, 6 §3; U.S. Const. Am. 1, 4, 5, 6, 7, 8, 10, 13 §3, 14 §1, 14 §4, 16, 26 §1; Habeas Corpus (28 USC §2241[ and 28 U.S.C. §2255(e)]); Clayton Act (1914); Sherman Antitrust Act (1980); Economic Espionage Act (1996); RICO; Dodd-Frank Act (2010); Rent Stabilization Act (1969);...*

*“Such is further claimed to be an alleged co-conspired antitrust and racketeering mortgage scheme (through CMBS, CDOs, DIL auctions, dark pool investments and staged judicial proceeding;... namely [under] U.S. Const. Am. 1, 4, 5, 8, 10, 13 §1, 14 §1, 14 §4,... where §10(b) and §13 of the SEC Act of 1934, Clayton Act (Sherman Act), Security Act of 1933 (as amended), Sarbanes Oxley Act (2002), as well as the Dodd-Frank Act of 2010 are highlighted), perpetrated, as claimed, to illegally reinvest into securitized investments of Decedents’ IRA, as well as the claimed prejudicial removal of rent stabilized tenants to eliminate PCV/ST’s tax exemption status in exchange for greater return on market-valued apartments[.]”* [emphasis added] *Id.* at “Page 2,” “Page 5,” “Page 6.”



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3. PLAINTIFFs' COMP. was, as claimed, dismissed in a contradicting manner six days

later (on December 26, 2018. See *ASHCROFT v. IQBAL* (Matter of Iqbal), 556 U.S. 678 (2002) citing *BELL ATLANTIC CORP. v. TWOMBLY* ("Matter of Twombly"), 550 U.S. 544, 555 (2007), "[ ] a court must proceed 'on the assumption that all the allegations in the complaint are true (even if doubtful in fact)' [.]" [emphasis added] See *MEEKS v. DASHIELL, ET AL.*, No. 638 (MD App.Ct., 2006):

"judicial estoppel [ ] prohibits a litigant from... taking one position that is accepted by one court and advocating a completely contrary position in another court, to try to gain advantage. *Vogel v. Touhey*, 151 Md.App. 682, 722 [828 A.2d 268] (2003) (citing *Eagan v. Calhoun*, 347 Md. 72, 88 [698 A.2d 1097] (1997))." [emphasis added]

4. Fed. R. Civ. P. 4 (28 U.S.C. §1915) is sought for review, based upon the "postfiling delayed review" doctrine, for the claimed early dismissal, provided after an approved In Forma, and after PLAINTIFF provided evidence of financial contracts for claimed antitrust offenses under the Plausibility, Parallelism and proof of contract. See *UNITED STATES v. FANFAN*, No. 04-105 (U.S. S.Ct., 2004), "Commission believes that use of a preponderance of the evidence standard is appropriate to meet due process requirements []." [emphasis added] See also *BELL ATLANTIC v. TWOMBLY*, 550 U.S. 544-556 (2007), "only a [com]plaint that states a plausible claim for relief survives a motion to dismiss. *Id.*, at 556." See also *ASHCROFT v. IQBAL*, 556 U.S. 678 (2002), citing Matter of Twombly, "a court must proceed 'on the assumption that all the allegations in the complaint are true (even if doubtful in fact)'" [.] See also *ERICKSON v. PARDUS*, 127 S. Ct. 2197 (2007). See Twombly's "Plausibility" Standard for Complaints[:] A New Special Pleading Rule for Antitrust or Complex Case Plaintiffs, or for All Plaintiffs?"

(by Mr. Tillman L. Lay, dated "Vol. 48, No. 6"))

"Twombly arose out of a class action Sherman Act ... Erickson held that a pro se prisoner's... was sufficient to satisfy the new 'plausibility' stan[dard ('Id. at 2200').] The Court cited both Twombly and 'the liberal pleading standards set forth by Rule 8(a)(2)' to support this result [('Id.')]... Erickson itself

FOOTNOTE 3: Source: "[https://www.spiegelmc.com/files/tll\\_imla\\_twombly.pdf](https://www.spiegelmc.com/files/tll_imla_twombly.pdf)."



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suggests that the plaintiff's pro se status was relevant [ (*Id.*)]... Perhaps more troubling,... is the cynical possibility that the new *Twombly* standard is intended primarily to protect large corporations from discovery burdens in plaintiff class actions, as opposed to governmental defendants facing civil rights claims[.]” [emphasis added]

See also “*Tightening Twiqbal: Why Plausibility Must Be Confined to the Complaint:*”<sup>4</sup>

“Justice Souter laid the seeds for a new era of pleading practices. Stating a claim under section 1, he wrote, would require a complaint ‘with enough factual matter ... to suggest that an agreement was made’ (*Id.* at 556).”

5. Evidence of **PLAINTIFFS**’ claimed sole beneficial, irrevocable, right to the “*LINDA WILLIAMS BENEFICIAL TRUST*” (Appendix C, with **DECEDENTS**’ *Individual Retirement Account* Agreement) can be seen in the contracts of the *U.S. Department of Treasury* (registration, dated September 15, 2001), *Internal Revenue Service* (a W-9 and SS-4 form filing) and with the institution of *Correspondent Services Corporation* (now FMR, “Fidelity”) of the trust’s Employer Identification Number (Appendix D), as well as verified in an email response from the *Federal Depository & Insur. Corp.*’s secure website to **PLAINTIFF** (Appendix E). See the Application to **Hon. Ruth Bader Ginsberg** (Appendix F) for five (5) Supplemental Briefs (15 pages), sought for filing on October 8, 2019 (Appendix G-K), seeking “*new legislation*,” allegedly for related “*intervening*” matters (see Rule 15.8).
6. The previously filed “*Supplemental Brief (Rule 15.8): Highlighted Injunctive Motion In Anticipation Of Summary Judgment*” (twice delivered to the *U.S. S.Ct.*, one allegedly missing from being returned filings, and provided to all defendants, and public (at least two months), in the filings of *WILLIAMS v. USA, ET AL.*, Dock. No. 19-1932(2<sup>nd</sup> Cir. Ct.)) was denied for filing in the *U.S. S.Ct.* for being oversized and contain numerous trade secrets (namely a real property tax-sale prior to auction revolving account) and scientific theories.

## PART F – CONCLUSION

8. This rehearing petition is sought for approval and reinstatement for conference.

WHEREFORE, the Court shall decide to set aside this rehearing petition, such notification shall be provided to **PLAINTIFF** with good cause shown and upon sufficient legal grounds without delay.

District of **CESTUI QUE STEVEN TALBERT**  
Signed and sworn to before **KRISTIN CHERISE BOVELL** (Pro Sé)

At the 10<sup>th</sup> day of October, 2019, by Signs will

FOOTNOTE 7: Source: “<http://www.fclr.org/fclr/estatistics/2019/Vol9Iss2FinalPublication.pdf>”

KRISTIN CHERISE BOVELL, Vol 9 Iss 2 Final Publication, 8/19  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires September 30, 2024

10/10/2019  
(Date)

1:28 PM  
(Time)

KRISTIN CHERISE BOVELL  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires September 30, 2024

Kristin Cherise Bovell, Notary Public

Seal

My commission expires September 30, 2024.