

No. 24-1118

IN THE

SUPREME COURT OF THE UNITED STATES

DONGMEI LI,

Plaintiff - Appellant -Petitioner,

v.

RICHARD PECK, ET AL.

Defendants - Appellees - Respondents.

STATE OF CONNECTICUT, ET AL,

Defendants

On Petition for Writ of Certiorari To the

United States Court of Appeals

for the Second Circuit

**PETITION FOR WRIT OF CERTIORARI**

Dongmei Li ,*Petitioner pro se*

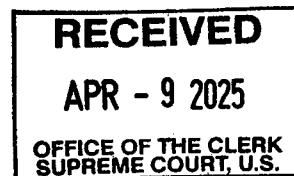
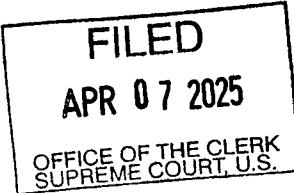
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April 7, 2025

**ORIGINAL**



## QUESTION PRESENTED

1.

Under 28 U.S.C. § 455(a), federal judges are statutorily disqualified from hearing cases whenever their "impartiality might reasonably be questioned." The Supreme Court held that disqualification was required as a matter of constitutional due process in multiple precedents.

Why could Connecticut federal district judge Victor A. Bolden illegally and unconstitutionally deny recusal in violation of Supreme Court precedent?

2.

Whether the circuit court should recognize the interlocutory appeal as a "substantial legal control issue" that prevents a statutorily and constitutionally unqualified judge from continuing to hear the case, and exercise jurisdiction to grant an immediate interim review, when an aggrieved party challenges a judge's refusal to disqualify?

or

Whether an appeal by an aggrieved party challenges a judge's refusal to disqualify should be automatically defined as a complaint alleging a federal judge has committed misconduct or has a disability that interferes with the performance of their judicial duties, and processed under The Judicial Conduct and Disability Act of 1980("Act"), 28 U.S.C. § 351-364, and the Rules for Judicial- Conduct and Judicial- Disability Proceedings("Rule"), as amended on March 12,2019.

Did the Second Circuit's *sua sponte* dismiss appellate review of an aggrieved party challenges a judge's refusal to disqualify and denying appellant's reconsideration without any explanation violate the plaintiff-appellant's equal rights and due process rights protected by the Fourteenth Amendment to the Constitution?

3.

Whether an aggrieved party may seek to vacate the orders without time limits under Federal Rules of Civil Procedure Rule 60 when the orders were issued by lower judges not following the Constitution, the statutes and rules made by Congress.

Are there a large number of unqualified judges in the Second Circuit and Connecticut District Courts who have entered the federal judiciary through affirmative action and DEI racial quotas, unconstitutionally and illegally discriminating against litigants, hindering citizens' access to equal justice, and blocking "the normal the appellate review progress" recently proposed by chief Justice Roberts?

**All PARTIES**

Dongmei Li,

Plaintiff - Appellant, Petitioner

V.

Li v. RichardPeckish; American Medical Response, Inc.; MacKenzie D'Lorio; St. Vincent's Medical Center; and the Town of Fairfield.

Defendants - Appellees - Respondents.

STATE OF CONNECTICUT, ET AL,

Defendants

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## RELATED PROCEEDING

- 07/21/2021 Plaintiff filed a complaint 1983 section at United States District Court of Connecticut -Bridgeport) (Dongmei Li v Connecticut, etc No. 3:21-cv-00996- VAB )
- United States Courts of Appeals for the Second Circuit case # 22-1980 / 22-2863 (Plaintiff-appellant filed on September 19, 2022 and )November 1, 2023.
- United States Supreme court # 22-1252 (Plaintiff - Appellant -Petitioner filed on April 20,2023)
- 06/13/2023 United States District Court of Connecticut Judge Bolden ordered the new caption will be Dongmei Li v. RichardPeckish; American Medical Response, Inc.; MacKenzie D'Lorio; St. Vincent's Medical Center; and the Town of Fairfield. (#177)
- 05/05/2024 #220 Plaintiff's Motion Disqualification of Judge Bolden (5/17/2024 Judge Bolden #227 ORDER denying 220 Ms. Li's motion for recusal)
- 05/19/2024 # 228 PLAINTIFF 'S MOTION TO VACATE ORDER 227 (05/20/2024 #229 Judge Bolden order denying # 228 motion to vacate order 227 and consider this motion as one for reconsideration of its Ruling and Order denying Ms. Li's motion for recusal . )
- 06/21/2024 NOTICE OF INTERLOCUTORY APPEAL as to [229] Order on Motion to Vacate,

by Dongmei Li. Filing fee \$ 605, receipt number Bpt-14398. (Freberg, B) United States Court of Appeals for the Second Circuit (Court of Appeals Docket #: 24-1659)

- 11/15/2024 the Second Circuit entered Sua Sponte Dismissal Order, FILED. #19
- 12/02/2024 Plaintiff-appellant Dongmei Li filed MOTION, for reconsideration #20
- 01/07/2025 the Second Circuit entered denying motion to reconsider by Dongmei Li, #21

## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

1. 28 U.S.C. Sec. 455 deals with the disqualification of district court judges and it states in part:

Any justice, judge, or magistrate, of the United States shall disqualify himself/herself in any proceeding in which his/her impartiality might reasonably be questioned.

*See also* 28 U.S.C. Sec. 144; Code of Judicial Conduct, Canon 3.C(1)(a).

2. The Judicial Conduct and Disability Act of 1980 (“Act”), 28 U.S.C. § 351-364, and the Rules for Judicial- Conduct and Judicial- Disability Proceedings (“Rule”), as amended on March 12,2019.
3. The Fourteenth Amendment Due Process Clause and The Equal Protection Clause

## TABLE OF AUTHORITIES

Ending Radical And Wasteful Government DEI  
Programs And Preferencing, The White House, January  
20, 2025

<https://www.whitehouse.gov/presidential-actions/2025/01/ending-radical-and-wasteful-government-dei-programs-and-preferencing/>

EEOC and Justice Department Warn Against Unlawful  
DEI-Related Discrimination, Wednesday, March 19, 2025

<https://www.justice.gov/opa/pr/eoc-and-justice-department-warn-against-unlawful-dei-related-discrimination>

Judicial Disqualification: An Analysis of Federal Law

Third Edition, published by Federal Judicial Center

Disqualification of Federal Judges by Peremptory  
Challenge By Alan J. Chest, published by Federal  
Judicial Center

Judicial Disqualification on Appeal, by Cassandra Burke  
Robertson, Gregory Hilbert

FAQs: Filing a Judicial Conduct or Disability Complaint  
Against a Federal Judge

<https://www.uscourts.gov/administration-policies/judicial-conduct-disability/faqs-filing-a-judicial-conduct-or-disability-complaint-against-a-federal-judge>

## CASES

Marshall v.Jerrico, Inc., 446 U.S. 238,242 (1980)

Berger v. United States, 255 U.S. 22 (1921), nn. 16, 520-21, 542-43

Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), nn. 4, 30-32, 496-98

Cheney v. United States District Court for the District of Columbia, 541 U.S. 913 (2004), nn. 44, 69, 70, 82-83, 113-14

Cramp & Sons Ship & Engine Building Co. v. International Curtiss Marine Turbine Co., 228 U.S. 645 (1913), nn. 572-73

Evans v. Gore, 253 U.S. 245 (1920), n. 46

Hollingsworth v. Perry, 570 U.S. 693 (2013), n. 109

Hoover v. Ronwin, 466 U.S. 558 (1984), nn. 545-46

Laird v. Tatum, 409 U.S. 824 (1972), n. 24

Liljeberg v. Health Services Acquisition Corp., 486 U.S. 847 (1988), nn. 36-37, 74, 84-85, 481-85, 607-10

Liteky v. United States, 510 U.S. 540 (1994), nn. 38, 158-63, 185, 200, 202-06, 233-34, 300, 310, 511-12, 514-16, 518-19, 522-26, 644-45

Moran v. Dillingham, 174 U.S. 153 (1899), n. 569

Murchison, In re, 349 U.S. 133 (1955), n. 27

Republican Party of Minnesota v. White, 536 U.S. 765 (2002), n. 232

Rexford v. Brunswick-Balke-Collender Co., 228 U.S. 339 (1913), nn. 570-71

Sao Paulo State of Federative Republic of Brazil v. American Tobacco Co., 535 U.S. 229 (2002), nn. 86-87

Tumey v. Ohio, 273 U.S. 510 (1927), nn. 17, 27, 495, 500

United States v. Grinnell Corp., 384 U.S. 563 (1966), nn. 155-57, 201

United States v. Will, 449 U.S. 200 (1980), nn. 47-48, 460

Ward v. Village of Monroeville, 409 U.S. 57 (1972), n. 2

Williams v. Pennsylvania, 136 S. Ct. 1899 (2016), nn. 499, 613-14

## **PETITION FOR A WRIT OF CERTIORARI**

Dongmei Li respectfully petitions for a writ of certiorari to review the order of the United States Court of Appeals for the Second Circuit in this case.

## **OPINIONS BELOW**

The Second Circuit's opinions reported as 24-1659, #19.1, entered on 11/15/2024, and #21.1 entered on 01/07/2025, are produced in the Appendix as App B and App C.

The District of Connecticut's opinion reported at 3:21-cv-00996-VAB #229 entered on 05/20/2024 and is reported at App A

## **JURISDICTION**

The Second Circuit's order was entered on January 7, 2025. This Court has jurisdiction under 28 U.S.C. §1254(1).

## **STATEMENT**

1.

From Ricci v. DeStefano, 557 US 557(2009) to Students for Fair Admissions v Harvard, 600 U.S.181(2023), the Supreme Court has upheld the unconstitutionality of affirmative action and DEI admissions programs.

2.

In 2025, President Trump and Attorney General Pamela Bondi issued executive orders on merit-based admissions and prohibition of illegal discrimination.

3.

However, after decades of affirmative action and DEI promotion, people with unqualified professional and technical qualifications have entered the U.S. government, the judiciary, and other fields. They only serve their own race, political party, and interest groups, especially in Democratic states. They have shown lawlessness, caused serious catastrophes in the United States, and seriously violated the freedoms and rights of the American people protected by the Constitution, causing serious harm to the American people and causing serious losses.

4.

The plaintiff-appellant-petitioner is such a victim and aggrieved person.

The plaintiff is an American Citizen, Asian woman, resident of Fairfield, Connecticut. in 2016 and 2020, Fairfield Police Department, American Medical Response Inc. (AMR), and St. Vincent's Medical Center (SVMC) ), for the purpose of revenge, hatred, and

financial fraud, twice conspired to kidnap the plaintiff into a Catholic mental hospital, imprisoned, tried to murder, tortured, maliciously maimed, administered medication without informed consent, forced abortion, and mentally abused the plaintiff.

Their evil motives and bad behavior have surpassed the most notorious human rights violations in European and American history, including the witch hunt, the Ku Klux Klan, the Nazis, and Unit 731 human experimentation.

After complaining to the Fairfield Police Department, Fairfield Town, the Connecticut State Attorney, the Connecticut Health Department, the Psychological Addiction Center, etc. to no avail, filing a civil lawsuit in federal court became the plaintiff's only option.

On July 21, 2021, after sufficient electronic discovery, the plaintiff filed a 1983 complaint in the Federal District Court of Connecticut. An amended complaint (document 8) was submitted on July 30, requesting a jury. Judge Victor A. Bolden, was designated as the presiding judge.

5.

However, Judge Victor A. Bolden, a former AULU lawyer, showed strong bias and prejudice in favor of the defendants from the very beginning when he took over the case.

Judge Victor A. Bolden failed to comply with federal hate crime statutes and declined to criminally prosecute suspects in the case.

Judge Victor A. Bolden granted all defendants' motions and denied / rejected all plaintiff's motions.

Judge Victor A. Bolden denied all the plaintiff's motion for default entry<sup>55</sup>(a) on behalf of the defendant without the defendant making a request.

Judge Victor A. Bolden twice violated federal rules and statute, stayed discovery and stayed justice (ECF 62, 63), simply to satisfy the defendant's need to delay and conceal evidence, and regardless of the plaintiff's objections.

Judge Victor A. Bolden's actions unbalanced the information between the plaintiff and the defendant, and he wanted to assist the defendant in making the plaintiff's evidence lose effectiveness due to delay.

Judge Victor A. Bolden colluded with the defendant to deny the plaintiff federal subject matter and personal jurisdiction under 12b(1) and 12b(2), violated the federal court's federal issue jurisdiction provisions, and discriminated against the plaintiff.

Judge Victor A. Bolden colluded with the defendants to deprive the plaintiff's constitutionally protected right to a jury without the plaintiff's written consent.

Judge Victor A. Bolden unfairly punished the plaintiff by dismissing 50 of the 55 defendants in the plaintiff's lawsuit without any error by the plaintiff. This violated the plaintiff's right to litigate protected by the federal constitution, only to help the defendant escape responsibility.

Judge Victor A. Bolden attempted to force a settlement between the plaintiff and the defendant.

Judge Victor A. Bolden colluded with the defendants and their attorneys to gaslighting the plaintiff.

Judge Victor A. Bolden colluded with the defendants and their attorneys to commit hate crimes against the plaintiffs' race and religion.

Judge Victor A. Bolden violated pre-existing federal rules and regulations and failed to comply with U.S. federal laws of civil procedure. His actions violated the plaintiff's rights to due process, access to justice, right to information, and right to a jury.

Judge Victor A. Bolden abused his discretion by threatening sanctions against the plaintiff who was completely innocent of the error, but did not sanction the defendants who were at fault.

Judge Victor A. Bolden maliciously interpreted federal subject matter jurisdiction and personal jurisdiction and betrayed federal interests.

Judge Victor A. Bolden created false discovery standards to help the defendant conceal and not disclose, but maliciously forced the plaintiff to answer some questions irrelevant to the case, or questions violating the plaintiff's privacy rights and privileges.

Judge Victor A. Bolden threatened the plaintiff, frightened the plaintiff as a victim, caused severe emotional distress, and further worsened the plaintiff's physical condition.

Judge Victor A. Bolden has violated the appearance of fairness of the court, tarnished the fair and impartial image of a judge, caused the public to lose confidence in the federal courts, seriously harmed the plaintiffs, and violated judge ethics.

Therefore, the plaintiff-appellant-petitioner filed the first appeal against the illegal order of Judge Bolden on October 31, 2022.

United States Courts of Appeals for the Second Circuit case # 22-1980 / 22-2863 United States Supreme court # 22-1252

The first appeal brought a greater level of retaliation and persecution against plaintiff in collusion between Judge Bolden and defendants, including malicious harassment of plaintiff's daughter and husband.

6.

May 5, 2024 #220 Plaintiff Dongmei Li moves to recuse and disqualify Victor A. Bolden pursuant to 28 U.S.C. § 455.

(See Marshall v.Jerrico, Inc., 446 U.S. 238,242 (1980))

In motion #220, the plaintiffs presented evidence of Judge Victor A. Bolden's inappropriate, one-sided communications with the defendant or his attorney, stating that this constituted judicial misconduct and dereliction of duty and a violation of ethical and judicial conduct:

In 2023 Fairfield defendants counsel legal assistant Amanda Mattei sent an email to the plaintiff and other attorneys representing American Medical Response (AMR) and St. Vincent's Medical Center. The email included a fake 911 call audio file, a PDF file which is a transcription of a June 20, 2020 911 call. This transcription file is enclosed. (Exhibit)

This transcription header shows the address: "915 Lafayette Boulevard - Suite 417, Bridgeport, Connecticut

06604". This is actually Judge Victor Balden's court office room.

Through a phone call to the court staff, it was confirmed there was no court meeting on either June 20, 2022 or September 12, 2022 in this courtroom.

Through a phone call to Brandon Legal Tech, LLC (37 Pinnacle Mountain Road, Simsbury, CT 06070), it was confirmed the audio transcription was not produced in the courthouse, and the 911 call audio was provided by Fairfield defendant attorney Dennis Durao. The producer of the fake audio file was Fairfield Defendant counsel's legal assistant Amanda Mattei.

The plaintiff then sent an email to Fairfield defendants counsel, accusing them of committing a crime by creating false documents.

However, Judge Bolden refused the plaintiff to submit evidence and refused to hear the plaintiff's allegations. Judge Bolden issued an order on June 3, 2023 (ECF 177):

However, Judge Bolden refused to allow the plaintiff to present evidence and refused to hear the plaintiff's allegations. Judge Bolden issued an order on June 3, 2023 (ECF 177) instead defaming the plaintiff for threatening the defendant's attorney.

Under 28 U.S.C. § 455(a), federal judges are statutorily disqualified from hearing cases whenever their "impartiality might reasonably be questioned." The Supreme Court held that disqualification was required as a matter of constitutional due process in multiple precedents.

However, judge Victor A. Bolden illegally and

unconstitutionally denies recusal himself.

The plaintiff's second appeal on 06/21/2024

United States Court of Appeals for the Second Circuit  
(Court of Appeals Docket #: 24-1659)

11/15/2024 the Second Circuit entered Sua Sponte  
Dismissal Order, FILED. #19

12/02/2024 Plaintiff-appellant Dongmei Li filed MOTION,  
for reconsideration #20

01/07/2025 the Second Circuit entered denying  
motion to reconsider by Dongmei Li, #21

## REASONS FOR GRANTING THE PETITION

### I.

**This Court should grant my petition because it concerns the question of whether “the appellate review progress” is really “normal” as recently raised by Chief Justice Roberts.**

In a post on Truth Social on March 18, 2025 morning, President Trump contended that Boasberg should be impeached.

In a statement released by the Supreme Court’s Public Information Office on Tuesday, Roberts indicated that “[f]or more than two centuries, it has been established that impeachment is not an appropriate response to disagreement concerning a judicial decision. The normal appellate review process exists for that purpose.”

I agree with President Trump's call and Justice Roberts' opinion.

Like President Trump, I have also suffered from the injustice and persecution of illegal federal judges. I have also written a letter Calling on Congress to impeach federal prosecutors and judges who do not enforce federal laws on June 27, 2024, as follows:

The principle of separation of powers in the United States stipulates that Congress is the maker of the national constitution and all laws. Our country also has the best and most complete democratic legal system in the world. In Common Sense (January 1776) Thomas Paine reminded the American colonists that in a free republic “ the law is king” and that if a day were to be set aside to celebrate the republic's achievements then it should not be focused on a single man but on the law itself:

*One hundred and fifty years ago, Congress passed Section 1983 to enforce the Fourteenth Amendment and ensure that individuals could go to federal court to redress constitutional violations by state and local governments and officials and obtain justice. Written in sweeping terms, Section 1983 provides that "[e]very person who, under color of any statute, ordinance, regulation, custom, or usage, of any State ... subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress."*

*On May 20, 2021, President Joe Biden signed into law the COVID-19 Hate Crimes Act, which incorporated the Khalid Jabara and Heather Heyer National Opposition to Hate, Assault, and Threats to Equality Act of 2021 (Jabara-Heyer NO HATE Act). Congress enacted this legislation in response to the dramatic increase in hate crimes and hate incidents against Asian American and Pacific Islander (AAPI) communities, during the COVID-19 pandemic.*

*However, according to another report made by the U.S. federal court system (<https://www.uscourts.gov/statistics-reports/judicial-business-2022>), it shows that last year, both civil and criminal cases in the U.S. federal courts were in a state of sharp decline. At the same time, the number of complaints against judges has increased.*  
*(<https://www.uscourts.gov/statistics-reports/judicial-business-2022>)*

*Our country has such a perfect constitution and legal system, but why are civil rights violations, racial profiling, and especially hate crimes against AAPI so frequent? Through practice and research, I believe this is because some federal prosecutors and judges refuse to enforce the Constitution, federal laws, and congressional resolutions. They regard themselves as the new kings and dictators and cannot enforce justice impartially and fairly.*

*The U.S. Courts were created under Article III of the Constitution to administer justice fairly and impartially, within the jurisdiction established by the Constitution and Congress.*

*The U.S. courts were established under Article III of the Constitution to fairly and impartially administer justice within the jurisdiction of the Constitution and Congress. Therefore, Congress should not only make laws, but also supervise the implementation of laws by federal courts, impeach judges who refuse to implement federal laws, and disqualify them from serving as lifelong judges of federal courts.*

*My name is Dongmei Li. I am an Asian American, a woman, and a victim of an Asian hate crime. On July 21, 2021, I sued 55 defendants in the U.S. District Court for the District of Connecticut. (3: 21-cv-00996) , alleging, unlawful seizure, excessive force, abuse of process, civil conspiracy, murder, malicious use of drugs, and racial profiling and discrimination under 42 U.S.C. § 1983, as well as state law claims of civil battery, intentional infliction of emotional distress, false imprisonment, and false arrest arising from two alleged incidents at Ms. Li's daughter's middle school and Ms. Li's residence in 2016 and 2020.*

*However, the judge, Victor A. Bolden, had demonstrated malice against the plaintiff and did not recuse himself. disregarding the abundant evidence presented by plaintiff through e-discovery, denying plaintiff federal issue jurisdiction and personal jurisdiction, and violating plaintiff's constitutional right to a jury.*

*Judge Bolden had ex parte contacts with defendants, that Judge Bolden was biased and prejudiced against plaintiffs, was unfair, misinterpreted the law through abuse of procedure, and conspired with defendants to conceal facts, gradually unlawfully eliminate plaintiffs' case and persecute plaintiff.*

*The appellant files an appeal against order ECF 229 because judge Victor Bolden had demonstrated malice against the plaintiff and did not recuse himself. The appellant also alleges judge Victor Bolden has committed misconduct and has a disability that interferes with the performance of his judicial duties.*

*This will be of great significance in reducing the growing number of hate crimes, especially hate crimes against Asians, and in maintaining the authority of Congress, the separation of powers in the United States, and the democratic rule of law in the United States.*

I sent my call to some senators, including Republicans and Democrats, but my letter fell on deaf ears. I certainly cannot compare with President Trump's huge influence. I hope that our federal legal system and appellate review system are sound and truly unobstructed as Justice Robert said. Because the due process clause and equal protection clause of the 14th Amendment of our Constitution promise to equally protect every American individual. So I insist on appealing here and fighting for a constitutional judicial system in our country.

The court should grant my petition of national importance.

## II.

**The Court should grant my petition because it concerns whether the judicial system can improve itself and remain constitutional after the catastrophe of affirmative action and DEI.**

March 2, 2025 Frank Ricci - the lead plaintiff in the landmark Supreme Court case Ricci v DeStefano - published an article

"The Harm that DEI has done to public safety cannot be overstated - PamBondi announced the DOJ will no longer force fire and police departments to hire underqualified candidates into their work." on the Spectator World.

In fact, an unqualified judge entering the judiciary because of affirmative action and DEI is more harmful to society than an unqualified firefighter or police.

I believe that an unqualified judge has two characteristics: first, they have no intellectual ability to understand our Constitution and laws; second, they are more inclined to use the judicial power they have obtained to serve their own specific race, party, and interest group.

For example, Judge Bolden's favorite refrain in issuing one of his unlawful orders was to assert that he had "inherent authority," regardless of whether he had applied the correct statute or had reasonably acted within the limits of the powers expressly granted or limited by the statute or rule.

Our American Constitution is the first written constitution of modern mankind. It is the pinnacle of

human spirit and will at its best, with rigorous logic and precise language expression. It is also a symbol that unites all American people of different national origins, races and religions.

Therefore, affirmative action and DEI are a disaster for the United States. It has almost turned our country into a lawless country where races hate and even kill each other.

It is human nature to favor people of one's own race. So in the case of *Students for Fair Admissions v. Harvard*, 600 U. S. 181(2023) Justice Jackson took on part in the consideration or decision of the case. But not all federal judges and justices have this judicial moral awareness. Therefore, there should be a more sound and clear channel for judicial disqualification on Appeal. Because when a litigant requests the disqualification of a federal district court judge on the grounds of partiality, the challenged judge will make the decision to disqualify himself. It is not until the appeal that a neutral third party will make a judgment on the rationality of questioning the judge's impartiality. Professor Karen Nelson Moore wrote: "swift review is essential to ensure impartiality."

The appellate process plays an important role in maintaining the appearance of justice. The Court of Appeal's refusal to exercise jurisdiction over an appeal of a judge's disqualification on the grounds that the judgment was not final prevents litigants from receiving fair treatment and an equal opportunity to be heard in a timely manner. This is unconstitutional.

In fact, an appeal by an aggrieved party challenging a judge's refusal to disqualify is often no longer arguments based on the appearance of justice, but often involve allegations of judicial disability. Federal courts have

explicitly directed appellate courts to administer complaints about judges' judicial disabilities. Both my motion and my appeal contain specific factual allegations of Judge Bolden's judicial disability.

Therefor, I suggest that an appeal court should automatically define an appellate review of judicial disqualification as a complaint alleging a federal judge has committed misconduct or has a disability that interferes with the performance of their judicial duties, and processed under The Judicial Conduct and Disability Act of 1980("Act"), 28 U.S.C. § 351-364, and the Rules for Judicial- Conduct and Judicial- Disability Proceedings("Rule"), as amended on March 12,2019.

The large number of judges who have entered the federal courts through the affirmative action movement and DEI are causing a serious constitutional crisis. This issue has been frequently discussed and appeared in the media and major think tanks since President Trump took office. Therefore, the judge should approve my petition.

### III.

My petition should be granted because the Second Circuit's decision for an aggrieved party challenging a judge's refusal to disqualify conflicts with other federal appellate courts on a matter of federal law and also conflicts with the Supreme Court. Conflict is such an important factor because it undermines uniformity of federal law. A basic principle of our legal system is that an outcome should not depend on the court a party finds itself in. The Supreme Court is in the unique position to enforce uniformity by resolving the conflict through a

**decision applicable to all of the courts below it.**

The appendix of Judicial Disqualification: An Analysis of Federal Law published by the Federal Judicial Center provides all the judicial disqualification proceedings of the Supreme Court.

However, the Connecticut District Court and the Second Circuit Court do not use the precedents of the U.S. Supreme Court. They maliciously and illegally create their own case law, which greatly disrupts the federal judicial order of the United States.

Conflict is such an important factor because it undermines uniformity of federal law. A basic principle of our legal system is that an outcome should not depend on the court a party finds itself in. The Supreme Court is in the unique position to enforce uniformity by resolving the conflict through a decision applicable to all of the courts below it.

Vertical *stare decisis*—the idea that the decisions of higher courts take precedence over the decisions of lower courts—is deeply entrenched in the American legal system. This idea is part of what makes the Supreme Court “supreme.”

Allowing lower courts to create their own common law will cause chaos in the American judicial system. Therefore, my petition should be granted.

My petition should be granted because our judicial system is experiencing a serious constitutional crisis, with widespread doubts among “We the People” about the impartiality of federal judges.

The Supreme Court’s policies and attitude determine

whether our federal courts can restore EQUAL JUSTICE  
UNDER LAW and MAKE AMERICA GREAT AGAIN.

This issue is of national importance.

## CONCLUSION

The Court should grant my petition.

Respectfully submitted.

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April 7, 2025

# APPENDIX

## TABLE OF APPENDICES

### APPENDIX A

Order of the U.S. District Court, Dongmei Li v. Richard Peck et al. 3:21-cv-00996-VAB #229 May 20, 2024 1

### APPENDIX B

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### APPENDIX C

Order of the United States Court of Appeals, Dongmei Li v. Rechard Peck et al (24-1659 #21 Jan. 07, 2025) 6

## APPENDIX A

**U.S. District Court  
District of Connecticut**

**Notice of Electronic Filing**

The following transaction was entered on 5/20/2024 at 2:59 PM EDT and filed on 5/20/2024

Case Name: Li v. Peck et al

Case Number: 3:21-cv-00996-VAB

Filer:

Document Number: 229(No document attached)

Docket Text:

ORDER denying [228] Motion to Vacate. Ms. Li has filed a motion renewing her request for the Court to recuse itself. See ECF No. 228 (May 19, 2024) ("[T]he plaintiff requests again that Judge Victor A. Bolden holds no further hearing on the motion or the lawsuit and that another district court judge be assigned to hear and rule on the motion and all further proceedings in the case.").

The Court will consider this motion as one for reconsideration of its Ruling and Order denying Ms. Li's motion for recusal. See Shrader v. CSX Transp., Inc., 70 F.3d 255, 257 (2d Cir. 1995) ("The standard for granting [a motion for reconsideration] is strict, and reconsideration will generally be denied unless the moving party can point to controlling decisions or data that the court overlooked—matters, in other words, that

might reasonably be expected to alter the conclusion reached by the court.").

Ms. Li has not pointed to any controlling decisions or data that the court overlooked, however, and thus does not meet the standard for granting a motion for reconsideration. Instead, Ms. Li reiterates that the evidence she included in her first motion—an Order by the Court instructing Ms. Li to refrain from directly contacting parties represented by counsel on matters related to ongoing litigation and to refrain from threatening counsel or paralegals with additional lawsuits under Rules 4.2 and 3.4 of the Connecticut Rules of Professional Conduct, ECF No. 177 (June 13, 2023)—establishes that the Court engaged in *ex parte* communications with Defendants.

But any "alleged bias and prejudice to be disqualifying must stem from an extrajudicial source and result in an opinion on the merits on some basis other than what the judge learned from his participation in the case." *United States v. Grinnell Corp.*, 384 U.S. 563, 583 (1966). On June 12, 2023, the Town Defendants filed an objection to Ms. Li's first set of interrogatories, which detailed specific communications from Ms. Li and attached copies of her e-mails. ECF No. [175] at 3-6, Exs. A-E. Thus, the Court learned about Ms. Li's communications to represented parties and her communications threatening the Town Defendants' counsel and paralegal from its participation in the case, not any *ex parte* communications with any party.

Accordingly, Ms. Li's motion for reconsideration is DENIED.

Signed by Judge Victor A. Bolden on 5/20/2024.  
(Thompson, M.)

3:21-cv-00996-VAB Notice has been electronically mailed to:

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## APPENDIX B

Case 24-1659, 11/15/2024, DktEntry: 19.1, Page1 of 1

### UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

At a Stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 15th day of November, two thousand twenty-four.

Present:

Amalya L. Kearse, Reena Raggi,  
Maria Araujo Kahn, *Circuit Judges.*

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Dongmei Li  
Plaintiff - Appellant,  
V.  
Richard Peck, et al.,  
Defendants - Appellees,  
State of Connecticut, et al.,  
Defendants.

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This Court has determined sua sponte that it lacks jurisdiction over this appeal because the district court has not issued a final order as contemplated by 28 U.S.C. §1291. See Petrello v. White, 533 F.3rd 110, 113 (2nd Cir.2008). Upon due considerations, it is hereby

ORDERED that the appeal is DISMISSED.

FOR THE COURT:  
Catherine O'Hagan Wolfe, Clerk of Court

*Catherine O'Hagan Wolfe*



## APPENDIX C

Case 24-1659, 01/07/2025, DktEntry: 21.1, Page1 of 2

### UNITED STATES COURT OF APPEALS for the SECOND CIRCUIT

At a Stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 7th day of January, two thousand twenty-five,

Present:  
Amalya L. Kearse, Reena Raggi,  
Maria Araujo Kahn, *Circuit Judges.*

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**ORDER** Docket No. 24-1659

DongmeiLi  
Plaintiff - Appellant,  
V.  
State of Connecticut, Dept of Public Health,  
Connecticut, Dept of Mental Health & Addiction Svcs,  
Connecticut, Richard Colangelo, Joseph T. Corradino,  
Anthony Formato, Morgan Rhodes, Fairfield Police  
Dept, Chris Lyddy, Lance Newkirchen, Richard Peck,  
Fairfield Emergency Communications Center, American  
Medical Response Inc, Bret Jackson, Mackenzie D'lorio,  
St. Vincent's Medical Center, Rachel Bouteiller, Fayoa  
Carmichael, Margaret Chuckta, Kellie Clomiro, Lori  
Dube, Jingchun Liu, Melissa Ortiz, Bonnie Perez,

Nadine Ritt, Jemesha Wright, Clifford Schwartz, Sharon Hasbani, Audrey Harrell, Ryan Liberman, Bujji B. Surapaneni, Dora Orosz, Christopher M. Orelup, Simon A. Ovanessian, Kelechi Ogbonna, Roger Jou, Lei Li, Stephanie A. Sirois, Amanda M. Sandrew, Raj K. Bansal, Miriam E. Delphin-Rittmon, Town of Fairfield, Fairfield Board of Education, Kovacs, James P. Zwally, Cynthia Anderson, Andrea E. Bertolozzi, Cynthia Campbell, Patricia Galich, Barbara Mcconachie, Christine Pannone, James Richards, Rahul Gupta, Bruny Jacques Germain, Lilliana Hernandez, Defendants - Appellees.

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Appellant Dongmei Li filed a motion for reconsideration and the panel that determined the motion has considered the request.

IT IS HEREBY ORDERED, that the motion is denied.  
For The Court:

Catherine O'Hagan Wolfe, Clerk of Court

  
Catherine O'Hagan Wolfe