

Case No. 25-1055

IN THE
SUPREME COURT OF THE UNITED STATES

RAYON PAYNE,
Petitioner,

FILED
AUG 21 2025
OFFICE OF THE CLERK
SUPREME COURT, U.S.

v.

UNITED STATES DISTRICT COURT FOR
DISTRICT OF COLUMBIA,

AND

HON. ANA C. REYES
Respondents.

ON PETITION FOR A WRIT OF MANDAMUS
TO THE U.S. DISTRICT COURT FOR THE
DISTRICT OF COLUMBIA

PETITION FOR A WRIT OF MANDAMUS

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QUESTIONS PRESENTED

1. Whether a United States District Court may transfer a case under 28 U.S.C. § 1404(a) to a judicial district where the Plaintiff has already demonstrated and documented structural bias and ongoing constitutional violations, thereby denying meaningful access to judicial remedies.
2. Whether it violates the Due Process Clause of the Fifth Amendment for a District Court to allow the government to review the Plaintiff's immigration file—used as the basis for its dispositive motion—while denying the Plaintiff access to the same records, and subsequently ruling on the government's motion.
3. Whether a District Court may sidestep its statutory responsibility under 8 U.S.C. § 1447(b) by transferring the case after acknowledging jurisdiction and after the Plaintiff invoked that provision to compel action on a naturalization application.
4. Whether a litigant is entitled to relief where the District Court closes the case while simultaneously placing the Plaintiff in procedural limbo by transferring the matter into a structurally compromised judicial district and circuit, thereby leaving no viable judicial forum for redress.

PARTIES TO THE PROCEEDING

Petitioner:

Rayon Payne, an individual and lawful permanent resident of the United States, and the pro se plaintiff in the underlying district court action and is the petitioner in this writ proceeding.

Respondents:

United States District Court for the District of Columbia, the federal trial court that issued the contested order transferring the case.

Hon. Ana C. Reyes, U.S. District Judge for the District of Columbia, who presided over the matter and issued the minute orders now at issue, is named in her official capacity only.

Real Party in Interest:

United States Department of Justice (DOJ) Attorneys of record Derrick A. Petit, Oluwatoyin Abejid, and Shadae Beaver represented the United States Citizenship and Immigration Services (USCIS) in the underlying district court action.

RELATED PROCEEDINGS

U.S. District Court for the District of Columbia

Payne v. USCIS Case # 1:25-cv-01952: Petitioner filed a lawsuit under 8 U.S.C. § 1447(b) in the D.C. District Court after USCIS failed to make a decision on his naturalization application within the statutory 120-day period.

Payne v. DHS Case # 1:25-cv-03186: Petitioner filed a FOIA lawsuit in the D.C. District Court seeking access to the records and decision-making rationale used in the 1447(b) matter.

Payne v. Reyes Case # 1:25-cv-03358: Based on the coordinated conduct between DOJ attorneys and Judge Reyes, Petitioner filed a civil rights complaint under 42 U.S.C. § 1985(3),

U.S. Court of Appeals for the D.C Circuit

In re Rayon Payne Case # 25-5349: Petitioner filed a writ of mandamus in the D.C. Circuit to disqualify Judge Ana Reyes from three cases. Although the Calendar Committee later removed Judge Reyes from the § 1985(3) case, she remained on the other two. The mandamus petition seeks her full disqualification and removal.

Payne v. USCIS Case # 25-5355: Following the unlawful transfer and dismissal of the 1447(b) case in Florida, Petitioner filed a Rule 60(b) motion to vacate the transfer order, citing fraud, misrepresentation, and violation of federal law.

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PETITION FOR WRIT OF MANDAMUS

Petitioner Rayon Payne respectfully petitions this Honorable Court for a Writ of Mandamus directed to the United States District Court for the District of Columbia, or any relevant lower federal tribunal, pursuant to the authority vested in this Court under the Constitution and 28 U.S.C. § 1651(a), the All Writs Act.

This petition arises from the District Court's grant of a motion to transfer venue to a forum that Petitioner has specifically and factually identified as structurally biased and constitutionally compromised, without first compelling production of a critical USCIS immigration file—a file the government reviewed and used to formulate its motion but never disclosed to the Petitioner.

Petitioner invokes this Court's supervisory authority to intervene where ordinary appellate remedies are unavailable or inadequate. This case presents extraordinary circumstances warranting the Court's review, where a lower court's action has effectively placed the Petitioner in procedural and constitutional limbo—without a meaningful forum, without access to critical evidence, and without the protections that federal procedural rules are meant to provide.

This is a matter of national and systemic importance that speaks directly to the integrity of federal judicial administration and a litigant's right to a fair and impartial forum.

OPINIONS BELOW

On September 4, 2025, the court issued a minute order granting the government's motion to transfer the case to the Middle District of Florida and denying its motion to dismiss Minute Order. The court reasoned that transfer was appropriate under 28 U.S.C. § 1404 for the convenience of the parties, despite Plaintiff's objections and filings documenting bias in the transferee forum.

On the same day, the court denied Plaintiff's emergency motion to stay the transfer order Minute Order, noting that the Plaintiff had repeated arguments already presented and rejected, and asserting that the federal courts in the Middle District of Florida were competent to adjudicate the matter.

No written opinion or findings of fact were issued. The case was terminated and transferred on September 4, 2025.

JURISDICTION

This Petition is filed pursuant to this Court's supervisory authority under 28 U.S.C. § 1651(a) which provides this Court with the power to issue all writs necessary or appropriate in aid of its jurisdiction and to exercise original jurisdiction in extraordinary circumstances where no other adequate means are available.

Petitioner seeks extraordinary relief because he is procedurally barred from obtaining judicial review or constitutional redress in any lower court. The United

States District Court for the District of Columbia has transferred the case to a judicial district that is the subject of an ongoing Supervisory Writ pending before this Court, and where Petitioner has already documented structural constitutional violations and bias, creating an irreconcilable conflict.

This Court's intervention is necessary to prevent a miscarriage of justice and to preserve the integrity of judicial process, as Petitioner has no remaining recourse in any other forum.

CONSTITUTIONAL AND LEGAL PROVISIONS INVOLVED

This case involves the following constitutional and statutory provisions:

- **U.S. Const. amend. V**
- **U.S. Const. art. III, § 2,**
- **8 U.S.C. § 1447(b),**
- **28 U.S.C. § 1651(a).**

STATEMENT OF THE CASE

Petitioner Rayon Sherwin Payne, a lawful permanent resident, initiated this action under 8 U.S.C. § 1447(b) in the U.S. District Court for the District of Columbia (“D.D.C.”), seeking judicial intervention after USCIS failed to adjudicate his naturalization application within the time prescribed by law. The Complaint, filed on June 22, 2025, named the United States Citizenship and Immigration Services (USCIS) as the defendant and raised serious constitutional concerns regarding delay, due process violations, and denial of access to critical immigration records.

Petitioner served all parties in accordance with federal rules, including the U.S. Attorney General, U.S. Attorney for the District of Columbia, and USCIS, by July 1, 2025. On August 20, 2025, the government sought and received an extension of time to respond to the Complaint, pushing the deadline to September 25, 2025.

On August 29, 2025, Petitioner moved to compel production of the A-file necessary to support his claims. The Court denied the motion, stating it would proceed in accordance with the Federal Rules of Civil Procedure following the government’s responsive pleading. (Minute Order, Aug. 29, 2025).

However, instead of responding to the Complaint, the government filed a motion to dismiss and motion to transfer venue on September 3, 2025. Petitioner opposed both, reiterating his due process claims, objecting to the use of his file without

disclosure, and asserting that D.D.C. was the proper and neutral venue in light of structural bias concerns documented in the Middle District of Florida.

On September 4, 2025, the District Court granted the motion to transfer to the Middle District of Florida — Petitioner's place of residence — and denied the motion to dismiss. (Minute Order, Sept. 4, 2025). The order ignored serious constitutional arguments raised by the Petitioner concerning ongoing conflicts and a supervisory writ pending against that very district and circuit. Petitioner immediately moved to stay the transfer, which the Court also denied the same day, dismissing arguments that were central to Petitioner's constitutional claims.

The case is now procedurally closed in D.D.C., and the transfer has been ordered to a forum that Petitioner has consistently challenged as structurally biased and incapable of fairly adjudicating his immigration claims due to preexisting conflicts, pending § 1983 and 42 U.S. Code § 1985 actions, and supervisory oversight issues.

This petition is necessary because Petitioner is now in procedural limbo, unable to seek remedy from a structurally compromised court, and unable to return to the District Court that abdicated its jurisdiction despite retaining authority under 8 U.S.C. § 1447(b). Petitioner seeks supervisory relief to vacate the transfer and preserve the integrity of

federal judicial process and constitutional protections.

REASONS FOR GRANTING THE PETITION

This Petition presents an extraordinary circumstance requiring immediate intervention by this Court to prevent a profound miscarriage of justice. The underlying conduct of the District Court for the District of Columbia represents a rare and constitutionally significant departure from the responsibilities imposed on Article III courts. Without intervention, the Petitioner is left suspended in procedural limbo—deprived of due process, denied judicial accountability, and forcibly returned to a structurally compromised venue.

I. The District Court’s Reliance on Minute Orders Constitutes Judicial Evasion and Procedural Ambiguity

The District Court issued no signed written order addressing the merits of Petitioner’s statutory claim under 8 U.S.C. § 1447(b). Instead, it issued a series of minute entries—informal, unsigned notations devoid of any formal findings, legal reasoning, or articulation of the court’s statutory obligations. These minute orders obscure the record, evade judicial accountability, and inhibit Petitioner’s ability to seek appellate review. The court’s conduct stands in stark contrast to the principle that federal judges must issue clear and reviewable rulings, especially when constitutional or statutory rights are implicated.

As courts have long warned, minute orders are inherently ambiguous and “may be meaningless for appeal purposes—or may trigger appeal deadlines without sufficient clarity or due process.” See Bankers Trust Co. v. Mallis, 435 U.S. 381, 386 (1978). Here, the District Court used informal procedural entries to dispose of a statutory claim that requires direct judicial engagement.

II. The District Court Violated Due Process by Allowing the Government to Withhold the Administrative Record While Using It to Seek Dismissal

The Petitioner moved to compel the release of the administrative immigration file that formed the basis of the government’s actions and its defense. The government refused to produce the file, and the Court denied the motion—stating instead that it would proceed “in accordance with the Federal Rules of Civil Procedure” upon receipt of the government’s responsive pleading. But the responsive filing that followed—styled as a Motion to Transfer and Dismiss—relied on the withheld file to assert convenience and procedural defenses.

This conduct squarely violates due process. “A party cannot rely on evidence or documentation while simultaneously withholding it from the opposing party.” See Brady v. Maryland, 373 U.S. 83, 87 (1963); Goldberg v. Kelly, 397 U.S. 254 (1970). The government’s ability to review the record and form defenses—while denying the Petitioner access to the same—is fundamentally unjust and prohibited under constitutional standards of fair process.

III. The District Court’s Transfer into a Structurally Biased Venue Violates Equal Access and Judicial Neutrality

Petitioner’s Complaint and filings extensively document constitutional and structural conflicts within the Middle District of Florida and the Eleventh Circuit, which are the subject of a pending supervisory writ before this Court. The receiving court is already implicated in:

- A 1983 action alleging judicial bias and constitutional violation,
- A supervisory writ pending before the U.S. Supreme Court documenting defiance of an Eleventh Circuit tolling order,
- And multiple procedural abuses that compromise the neutrality of the venue.

Despite this, the District Court transferred this case into the Middle District of Florida, asserting no justification apart from “convenience”—not of the Plaintiff, but of the United States government. This violates foundational venue doctrines and contravenes the very purpose of 8 U.S.C. § 1447(b), which exists to centralize jurisdiction in a neutral forum once a naturalization petition has been delayed beyond 120 days.

IV. The District Court Abandoned Its Statutory Duty Under 8 U.S.C. § 1447(b)

The language of 8 U.S.C. § 1447(b) is clear:

"If there is a failure to make a determination... before the end of the 120-day period, the applicant may apply to the United States District Court for a hearing on the matter. The court has jurisdiction over the matter and may either determine the matter or remand the matter..."

Congress deliberately vested federal district courts with the exclusive jurisdiction to resolve or remand naturalization matters when agency delay occurs. Once this jurisdiction vests, it cannot be transferred merely for agency convenience, nor can it be sidestepped via unsigned minute orders.

The District Court's refusal to adjudicate the case—while claiming it would proceed under the civil rules, only to abandon that commitment—reflects a disturbing abdication of statutory responsibility and denies the Petitioner the judicial resolution Congress has expressly provided.

V. The Government's Claim of Improper Venue Is Inconsistent with Its Conduct and Legally Waived Under Rule 12

The Department of Justice accepted service of process in the District of Columbia, filed a notice of appearance, and participated in the proceedings. Its belated argument—that the District of Columbia was not the proper venue—is inconsistent with this

conduct and constitutes a clear waiver under Federal Rule of Civil Procedure 12(h)(1).

Rule 12(h)(1) provides:

"A party waives any defense listed in Rule 12(b)(2)-(5) by... failing to either (i) make it by motion under this rule; or (ii) include it in a responsive pleading."

Venue objections must be raised at the earliest opportunity—typically in a Rule 12(b)(3) motion or in the initial answer. The government raised no such defense. Instead, it waited until after reviewing the record and requesting additional time from the Court before claiming that venue in D.C. was inconvenient and improper.

Courts have consistently held that such tactics amount to waiver. See Leroy v. Great W. United Corp., 443 U.S. 173, 180 (1979) (“Venue statutes are primarily for the benefit of the defendant and may be waived...”).

Additionally, all parties—including government counsel—were served in the District of Columbia and accepted that service without objection. The government’s tactical reversal—seeking to move the case to a venue it deems more favorable—undermines the very integrity of the judicial process. It also directly contradicts the Court’s previous acknowledgment that the matter would proceed “in accordance with the Federal Rules of Civil Procedure.”

This sequence of conduct renders the transfer fundamentally unjust and procedurally improper, and further supports the necessity of extraordinary intervention by this Court.

VI. Venue Manipulation and Procedural Obstruction Undermined Plaintiff's Right to Due Process

This Court should grant the writ because the transfer of venue from the District of Columbia to the Middle District of Florida was not merely erroneous — it was constitutionally defective. Plaintiff's chosen forum was the District of Columbia, and venue was proper under both 8 U.S.C. § 1447(b) and the well-established principle that a plaintiff's choice of forum is to be given deference, especially in civil rights and immigration-related litigation involving federal actors and constitutional claims. See Gulf Oil Corp. v. Gilbert, 330 U.S. 501, 508 (1947).

Here, Plaintiff selected the District of Columbia specifically because of documented and ongoing structural bias in the Middle District of Florida — a conflict acknowledged in prior proceedings and reflected in two pending Supreme Court writs implicating that very district and its circuit.

Despite this, the District Court in D.C. granted the Government's motion to transfer venue, following a pattern of procedural irregularity that deprived Plaintiff of his right to meaningfully challenge that transfer:

1. The Government first requested a 30-day extension to “review the file.”
2. Plaintiff filed a motion to compel access to that same file to ensure parity.
3. The Court denied Plaintiff’s motion to compel — not via signed order, but by minute order, denying Plaintiff a clear appealable ruling.
4. Days later, the Court granted the Government’s motion to transfer — again by minute order — and instructed the clerk to close the case, effectively stripping the D.C. Circuit of jurisdiction and foreclosing Plaintiff’s appellate path.

The use of minute orders in this context was not neutral. It operated to block an appeal under the collateral order doctrine — a well-known exception to the final judgment rule, which permits interlocutory appeals where an order:

- conclusively determines the disputed question;
- resolves an important issue completely separate from the merits;
- and is effectively unreviewable on appeal from a final judgment.

See Cohen v. Beneficial Indus. Loan Corp., 337 U.S. 541, 546 (1949); Mohawk Indus., Inc. v. Carpenter, 558 U.S. 100, 106 (2009).

Had the denial of Plaintiff's motion to compel been formalized in a signed order, it may have been appealable under this doctrine. But the strategic use of minute orders — denying relief without formal process — deliberately prevented such review.

Moreover, this procedural sleight of hand created a due process violation. See Goldberg v. Kelly, 397 U.S. 254, 267 (1970) ("The fundamental requisite of due process of law is the opportunity to be heard."). The Plaintiff was denied not only an opportunity to access the very record the Government used to justify transfer but also an opportunity to meaningfully contest the venue change on appeal.

Finally, the manipulation of venue is particularly egregious here because Plaintiff is a pro se litigant, who relied on the District Court to provide a neutral forum. See Haines v. Kerner, 404 U.S. 519 (1972) (pro se filings must be held to less stringent standards). Instead, the District Court collaborated with the Government to shift litigation to a venue Plaintiff had already challenged for structural bias — leaving Plaintiff in procedural limbo and effectively outside the protection of any Article III court.

VII. Irreversible Prejudice and Judicial Interference with Statutory Rights

This case presents an extraordinary circumstance where an Article III judge, presiding over an immigration matter properly brought under 8 U.S.C. § 1447(b), not only failed to exercise jurisdiction but actively interfered with the petitioner's statutory and procedural rights. This interference inflicted irreversible prejudice that no lower court can remedy.

Upon the government's request for a 30-day extension to review its own file — which it claimed was necessary to formulate a responsive pleading — the petitioner moved to compel access to that same file. The court denied the motion to compel in a minute order, stating it would allow the government to respond first, and only then proceed under the Federal Rules of Civil Procedure. However, allowing the government to review and utilize a file to formulate a responsive position, while denying the petitioner access to that same file, undermined the adversarial process and violated fundamental due process protections guaranteed under the Fifth Amendment.

The Supreme Court has long held that “[t]he fundamental requisite of due process of law is the opportunity to be heard.” Goldberg v. Kelly, 397 U.S. 254, 267 (1970). That opportunity must include access to the same factual record used against the litigant. Brady v. Maryland, 373 U.S. 83, 87 (1963), reinforces the principle that suppression of evidence favorable to the defense — particularly when such

evidence is material — constitutes a violation of due process. In this instance, the petitioner was not only denied favorable material but denied any access to the record upon which the opposing party (the government) based its procedural motion to transfer venue.

Such a denial, particularly in the context of a statutorily authorized petition under 8 U.S.C. § 1447(b), is more than procedural error — it is structural interference. That statute explicitly gives district courts jurisdiction when the agency fails to act within 120 days of an application for naturalization. Congress did not authorize courts to decline jurisdiction after that threshold is met, nor to transfer venue in coordination with the government while denying the petitioner meaningful procedural participation.

This structural interference was compounded by the judge's use of unsigned minute orders, which insulated her decisions from appeal by creating no formal, appealable judgment. Thus, the petitioner was stripped of both discovery and judicial review — the twin engines of fairness in federal litigation.

Courts have condemned such procedural manipulation. As the Supreme Court stated in See Hamdi v. Rumsfeld, 542 U.S. 507 (2004), “a state of war is not a blank check for the President when it comes to the rights of the Nation’s citizens.” See at 542 U.S. 507, 536 (2004). Similarly, administrative complexity or docket management concerns are not blank checks for courts to violate a litigant’s statutory or constitutional rights.

The damage here is not theoretical. The government benefitted from an undisclosed file, leveraged that position to transfer the case into a structurally compromised forum, and was shielded from procedural challenge by the judge's refusal to create a formal, reviewable record. This has left the petitioner in procedural and legal limbo — a violation that cannot be undone retroactively.

Relief from this Court is not merely appropriate; it is necessary. No other forum can correct the harm, and the underlying actions reflect a pattern of judicial and executive coordination that undermine the very foundations of due process and statutory compliance.

REQUEST FOR PROTECTIVE RELIEF

Pursuant to the All Writs Act, 28 U.S.C. § 1651, and Supreme Court Rule 20, Petitioner respectfully requests narrowly tailored protective relief to prevent irreparable harm and ensure the integrity of proceedings currently pending before this Court. Given the documented instances of judicial interference, retaliatory behavior, and the suppression of critical records—including in connected lower court actions—Petitioner seeks the following:

- a. Consolidation of this request with related writs already docketed, to ensure uniform protection across matters involving overlapping facts and respondents;

- b. An order preserving all relevant records and materials (e.g., FOIA requests, immigration A-files, court dockets, communications), and instructing government agencies to cease any action that might compromise their integrity;
- c. Direction to the United States Marshals Service to assist in record preservation and, if necessary, the secure service of documents;
- d. A temporary injunction on all related proceedings in the District of Columbia (District and Circuit Courts), the Middle District of Florida, Eleventh Circuit Court of Appeals, the Florida Supreme Court, and All lower courts in Florida, pending full Supreme Court review;
- e. Any further relief deemed appropriate by this Court to safeguard Petitioner's rights and the Court's jurisdiction.

CONCLUSION AND PRAYER FOR RELIEF

This Petition presents a constitutional crisis stemming from deliberate procedural maneuvers and judicial evasion by a sitting Article III judge in the United States District Court for the District of Columbia. The judge allowed the government to review records essential to Petitioner's case, while denying the Petitioner equal access through a motion to compel, thereby affording the government a tactical advantage. This denial—under the pretense of later following the Federal Rules of Civil

Procedure—was never honored. Instead, the court enabled the government to file a position based on withheld records, and then transferred the case into a structurally biased forum, previously and publicly documented by the Petitioner.

By doing so, the District Court Judge not only abandoned the jurisdiction conferred upon her under 8 U.S.C. § 1447(b) but interfered with the Petitioner's immigration statutory rights, producing irreversible prejudice. That prejudice cannot be undone by remand or further litigation in a compromised venue. The record has already been tainted, the statutory deadlines violated, and the constitutional guarantees of equal access, due process, and fair adjudication denied.

The Petitioner has been procedurally boxed out: blocked from appeal to the D.C. Circuit, denied due process in the D.C. District Court, and now exposed to continued harm in a forum where structural bias has already been established. No lower court remains neutral or qualified to render relief.

Accordingly, the Petitioner respectfully prays that this Honorable Court:

1. Issue a writ of mandamus directing the United States District Court for the District of Columbia to vacate its order transferring the proceeding to the United States District Court for the Middle District of Florida pursuant to 8 U.S.C. § 1447(b);

2. Direct the D.C. District Court to adjudicate the case on the merits, as required under 8 U.S.C. § 1447(b) and 28 U.S.C. § 1651(a);
3. Alternatively, in light of the irreversible prejudice and compromised record, grant the Petitioner U.S. citizenship outright under this Court's equitable powers and in furtherance of the statutory scheme that the District Court was obligated to enforce;
4. Grant narrowly tailored protective relief as detailed in the section above REQUEST FOR PROTECTIVE RELIEF, including record preservation, consolidation of related proceedings in this court, and the assistance of the United States Marshals Service as necessary.
5. Grant any other relief the Court deems just and proper to restore Petitioner's statutory and constitutional rights.

Date: 11 / 24 /2025 Respectfully submitted,

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