

No. 25-6604

ORIGINAL

IN THE  
SUPREME COURT OF THE UNITED STATES

FILED  
JAN 13 2026

OFFICE OF THE CLERK  
SUPREME COURT, U.S.

In Re Angeliina L. Lawson

(Your Name)

— PETITIONER

vs.

Judge John Broomes  
and Mag. Judge Teresa James

— RESPONDENT(S)

ON PETITION FOR A WRIT OF MANDAMUS

Tenth Circuit

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF MANDAMUS

Angeliina L. Lawson

(Your Name)

1914 5th Avenue

(Address)

Leavenworth, KS 66048

(City, State, Zip Code)

(913) 972-1661

(Phone Number)

## **QUESTION(S) PRESENTED**

1. Whether this Court should issue a writ of mandamus (25-3158) to correct the Tenth Circuit's denial of emergency relief, where a pro se litigant proceeding in forma pauperis has been procedurally blocked from initiating service of process in a federal RICO and civil rights action due to indefinite pre-service screening by district judges with direct entanglement in the subject matter of the suit, and where that court also refused to reassign the case to a neutral panel despite uncontested evidence of judicial bias, ADA retaliation, and structural obstruction in violation of 28 U.S.C. §§ 292(b), 294, and 455.

## **LIST OF PARTIES**

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

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

## **RELATED CASES**

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### FEDERAL STATUTES:

28 U.S.C. § 1651(a) All Writs Act
28 U.S.C. § 455(a) Appearance of bias. Required disqualification not discretionary.
28 U.S.C. § 292(b) and § 294(d) Reassignment mechanisms invoked in your relief.
42 U.S.C. § 12132 ADA Title II public entity nondiscrimination
42 U.S.C. § 12203 ADA retaliation and interference

### Supreme Court Rules:

Rule 20 Extraordinary writs
Rule 39 In forma pauperis procedure
Rule 14 Form and content of petitions
Rule 8 Stay or injunction pending appeal (analogous authority)

### Maxims Of Law / Common Law Principles:

Justice delayed is justice denied	Common-law maxim; Blackstones Commentaries
No man shall be judge in his own cause.	Nemo judex in causa sua foundational common-law rule of impartiality
Fraud vitiates everything it touches.	Common-law principle cited in Hazel-Atlas
Where there is a right, there is a remedy.	Ubi jus ibi remedium

### COMMON LAW AND EQUITABLE DOCTRINES

Clean hands A court of equity will not aid one who has acted unconscionably.
Inherent judicial bias renders judgment void - Derived from English common law and reaffirmed in Caperton.
Public office is a public trust - Common-law principle underlying Canon 1.
The law will not allow a wrong without a remedy - Core equitable doctrine applied in Marbury v. Madison, 5 U.S. (1 Cranch) 137 (1803).

### Judicial Conduct Canons:

Canon 1 Uphold integrity and independence of the judiciary
Canon 2 Avoid impropriety and appearance of impropriety
Canon 3 Perform duties fairly and impartially
Canon 3(D) Disqualification and recusal for bias or conflict of interest

### CONSTITUTIONAL PROVISIONS:

U.S. Const. art. III Judicial power and federal jurisdiction
U.S. Const. art. VI (Supremacy Clause) Federal law supreme over state actions
U.S. Const. amend. I Petition for redress; retaliation protection
U.S. Const. amend. V Due process and takings clauses
U.S. Const. amend. IX Retained fundamental rights
U.S. Const. amend. X Reserved powers; limits on state abuse of authority
U.S. Const. amend. XIV Due process and equal protection guarantees
Kansas Const. Bill of Rights § 1 Inalienable natural rights (life, liberty, happiness)
Kansas Const. Bill of Rights § 18 Remedy by due course of law; justice without delay

IN THE  
SUPREME COURT OF THE UNITED STATES

**PETITION FOR WRIT OF MANDAMUS**

Petitioner respectfully prays that a writ of mandamus issue.

**OPINIONS BELOW**

For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix A to the petition and is

reported at 25-3158; or,  
[ ] has been designated for publication but is not yet reported; or,  
[ ] is unpublished.

The opinion of the United States district court appears at Appendix        to the petition and is

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

[ ] For cases from **state courts**:

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

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

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

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

## JURISDICTION

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was 11/04/2025.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: 11/24/2025, and a copy of the order denying rehearing appears at Appendix c.

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

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

For cases from **state courts**:

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

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

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

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

## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

U.S. Const. art. III, § 1 - Judicial Power Federal courts have a duty to provide judicial remedies. The Tenth Circuit denied request to enforce this duty.

First Amendment - Right to petition government for redress Filings in federal court are protected petitioning activity. The refusal to process summons and ADA filings implicates First Amendment retaliation.

Fifth Amendment - Due process & takings Constructive denial of access, suppression of filings, and failure to process ADA claims may constitute a procedural and substantive due process violation.

Fourteenth Amendment - Due process & equal protection Relevant to both underlying state case and the federal system's failure to provide a neutral remedy. Equal protection applies to ADA and access-to-court harms.

Ninth Amendment - Retained fundamental rights Cited to support parental rights, family integrity, and bodily autonomy when those rights are not explicitly listed elsewhere.

Supremacy Clause (Art. VI) The federal courts' obligation to enforce federal rights (ADA, §1983, RICO) supersedes state judicial obstruction

## STATEMENT OF THE CASE

Petitioner Angeliina Lynn Lawson is a pro se litigant with a federally recognized communication disability who filed a civil RICO and civil rights action in the United States District Court for the District of Kansas (Case No. 6:25-cv-01179) on August 15, 2025. The complaint named eighteen defendants primarily Kansas state judges, clerks, ADA coordinators, and government officials alleging systemic ADA retaliation, parental rights obstruction, evidence tampering, and judicial racketeering under 18 U.S.C. §§ 1961, 1968, 42 U.S.C. §§ 1983, 12132, and 12203.

Simultaneously, Petitioner filed:

- a motion to proceed in forma pauperis;
- a motion for reassignment to a three-judge out-of-district panel pursuant to 28 U.S.C. §§ 292(b), 294, and 455(a), citing pervasive judicial conflicts;
- and an emergency motion for preservation of evidence due to ongoing spoliation by named defendants.

Rather than rule on those threshold motions, the District of Kansas engaged in procedural inversion. Within four days, the case was reassigned sua sponte to Judge John W. Broomes, who was already presiding over multiple of Petitioner's pending federal cases involving the same factual pattern, including retaliatory ADA violations, child endangerment, and judicial misconduct. That same day, Magistrate Judge Teresa J. James was assigned, despite Petitioner's specific objection to her involvement due to prior rulings adverse to her in related cases.

On August 21, 2025, the court granted IFP status but entered an unusual text-only order staying the issuance of summons until further order of the court. In the next order, the magistrate judge denied the emergency evidence preservation motion as "premature," citing the lack of service. These two orders created a closed procedural loop: summons could not issue because the court withheld them, and preservation relief was denied because summons had not issued.

Petitioner's renewed motion for reassignment to an out-of-district panel, citing 28 U.S.C. § 455(a) and the statutory power of the Circuit Chief Judge to assign outside judges was summarily denied without engagement. The original motion for reassignment (Doc. 4) was never ruled upon. No findings were entered regarding impartiality, conflict of interest, or structural incapacity. The court ignored its statutory duty to consider appearance-based recusal and treated the matter as a discretionary inconvenience, contrary to *Caperton v. Massey Coal Co.*, 556 U.S. 868 (2009), and *In re Murchison*, 349 U.S. 133 (1955).

The Tenth Circuit (Case No. 25-3158) denied Petitioner's petition for writ of mandamus on November 4, 2025, asserting that the district court's refusal to issue summons or reassign the case was not "extraordinary," and that Petitioner retained an "adequate remedy" via future appeal, even though the court itself had indefinitely blocked service. The panel opinion ignored binding precedent on due process, ADA Title II retaliation, and the All Writs Act.

While purporting to rely on 28 U.S.C. § 1915(e)(2) to justify a stay, the district court never issued a dismissal or screening order. No § 1915(e)(2)(B) review occurred. The docket reflects no basis for the stay and no meaningful review of Petitioner's motions for reassignment, preservation, or Rule 60(d)(3) fraud.

The result is judicial paralysis: no service, no hearing, no access to discovery, and no procedural mechanism to correct or challenge the unlawful reassignment. Petitioner's litigation hold, served on more than 20 officials on June 26, 2025, was ignored, and evidence of ADA retaliation, custody interference, and GAL misconduct continues to be destroyed. The Kansas Supreme Court has likewise failed to rule on emergency petitions seeking relief from void state custody orders, despite facial violations of K.S.A. 23-3401(b)(2) (21-day hearing rule) and K.S.A. 21-5409 (parental custody interference).

This petition now comes before the U.S. Supreme Court as the only court capable of:

- ending the unconstitutional delay and spoliation,
- restoring Petitioner's due process rights,
- and ensuring that her case proceeds before a neutral tribunal empowered to adjudicate her claims under Article III, the ADA, and the First and Fourteenth Amendments.

## REASONS FOR GRANTING THE PETITION

This petition meets all three conditions for mandamus relief under Supreme Court Rule 20 and *Cheney v. U.S. District Court*, 542 U.S. 367, 380-81 (2004):

- (1) There is no other adequate remedy;
- (2) Petitioner's right to relief is clear and indisputable; and
- (3) The issuance of the writ is appropriate under the circumstances.

This Court should grant the writ to preserve appellate jurisdiction, remedy structural judicial bias and paralysis, protect ADA rights, and prevent the ongoing destruction of evidence that threatens the integrity of both the proceedings and the judiciary itself.

### I. Mandamus Is Necessary to Preserve Access to a Neutral and Functional Court

Petitioner's core request, that her civil RICO and ADA case proceed before a neutral Article III tribunal, is both constitutionally guaranteed and procedurally blocked. The District of Kansas granted IFP status, yet stayed summons indefinitely. The magistrate judge then denied emergency preservation on the grounds that defendants had not been served, creating a closed-loop procedural trap that has frozen the case since August 2025. This is not an administrative delay. It is a constructive refusal to exercise jurisdiction, of the kind this Court has previously corrected through mandamus. See *Will v. Calvert Fire Ins. Co.*, 437 U.S. 655, 661-62 (1978); *Johnson v. Rogers*, 917 F.2d 1283 (10th Cir. 1990). The Tenth Circuit's assertion that these actions are "not extraordinary" ignores the fact that no court is currently functioning as a constitutional forum. That denial implicates Article III, the ADA, and due process protections that prohibit courts from sabotaging access to justice through procedural evasion.

### II. Petitioner's Right to Relief Is Clear and Indisputable

Several sources of law independently make Petitioner's right to relief "clear and indisputable": 28 U.S.C. § 455(a) and *Caperton v. Massey*, 556 U.S. 868 (2009), prohibit a judge from presiding over cases where their impartiality might reasonably be questioned. Judge Broomes and Magistrate Judge James were directly involved in Petitioner's related cases and rejected motions challenging their neutrality without referring them for independent review.

28 U.S.C. § 292(b) gives the Chief Circuit Judge authority to designate out-of-district judges when "public interest so requires." The statute was properly invoked, but the District Court failed to respond, violating its duty under *Marbury v. Madison*, 5 U.S. 137 (1803), to apply controlling law. Fed. R. Civ. P. 4(c)(3) requires issuance of summons upon IFP approval. The court instead imposed an indefinite stay not authorized by 28 U.S.C. § 1915(e)(2) or any local rule, amounting to a refusal to act in violation of due process. See *Mallard v. U.S. Dist. Court*, 490 U.S. 296, 309 (1989). The judicial conduct described also falls within *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944), as fraud upon the court: procedural manipulation that interferes with the impartial operation of justice itself. This includes: misassignment of biased judges, suppression of evidence-preservation requests, concealment of ADA filings, and continuing spoliation of electronically stored evidence after notice.

### III. Mandamus Is the Only Remedy Capable of Preventing Irreparable Harm

Petitioner cannot appeal final judgment because no judgment exists.

There is no alternative route to redress the denial of service, refusal to rule on recusal, or structural incapacity of the assigned judges. Moreover, ongoing irreparable harm is occurring: Evidence subject to litigation hold is being destroyed, suppressed, or altered. Petitioner's child identified in sealed filings remains at risk under void custody orders never reviewed by a federal court. ADA Title II retaliation is being deepened through the denial of access to docketing, summons, and the judicial process itself. Petitioner's First Amendment right to petition government for redress is being obstructed by state and federal actors using procedural tools to suppress protected filings. This meets the standard in *Ex parte Peru*, 318 U.S. 578 (1943), which authorizes mandamus when necessary to prevent frustration of the Court's appellate jurisdiction. It also aligns with this Court's recognition in *Tennessee v. Lane*, 541 U.S. 509 (2004), and *United States v. Georgia*, 546 U.S. 151 (2006), that Title II of the ADA applies when access to courts is denied by reason of disability and procedural obstruction.

### IV. This Petition Implicates Questions of Exceptional Importance

This is not an isolated dispute. The pattern of judicial conduct described, including docket suppression, ADA retaliation, refusal to recuse, and constructive service denial, has been repeated in multiple actions and appeals involving Petitioner. The broader constitutional question is whether a structurally conflicted court may hold a pro se ADA litigant in procedural limbo, deny her emergency motions without ruling on her judicial bias objections, and then invoke judicial discretion as a shield against accountability.

This Court has condemned that pattern before. In *Gutierrez v. Saenz*, 606 U.S. \_\_\_\_ (2025), it reaffirmed that "due process does not countenance procedural sleight of hand whereby a state extends a right with one hand and takes it away with another." That holding applies here. The grant of IFP was hollowed out. The right to a forum has become a closed hallway. Summons is indefinitely stayed. Evidence disappears.

If ever there were a case where Rule 20 relief is not only warranted but necessary, this is it.

## **CONCLUSION**

The petition for a writ of mandamus should be granted.

Respectfully submitted,

Angeliina L. Lawson

Date: 01/13/2026