

# *In the Supreme Court of the United States*

No. 25A549

*IN RE: HENRY L. KLEIN,*

*Mandamus and GVR Petitioner*

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## **EMERGENCY RULE 21 MOTION TO THE FULL COURT**

Pending before the Full Court is Application 25A549, originally presented to Justice Samuel A. ALITO, Jr., resubmitted to Justice Neil M. GORSUCH and referred to the Full Court for its February 27, 2026 Conference. Pursuant to Rule 21.1, Henry L. Klein (“Mandamus Petitioner Klein”) moves as follows:

The “Question Presented” squarely implicates the *Supremacy Clause* of the Constitution, seeking enforcement of *Henson v. Santander Consumer USA*, 598 U.S. 79 (2017) (“*Henson*”). In Louisiana, well in excess of 50 state-court judges and at least 10 Erie judges at have ignored the undisputed fact that the 12 winning bidders of 1268 loans with a face value of \$1,800,745 have not qualified to transact business in Louisiana<sup>1</sup>. All 12 bidders claim to be exempted from Louisiana’s Door-Closing law as “...debt-collectors...”. None have qualified as debt collectors and all 12 **OWNERS** of the 1268 toxic loans have paid no taxes on billions in vulgar profits, Exhibit A.

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<sup>1</sup> The \$1.8 billion face value severely understates the size of what Mandamus Petitioner-Klein has referenced as “...the biggest civil heist in US history...” Compounding the corruption before the Court is the fact that none of the successful bidders have paid taxes on the epic fleecing *sub judice*.

For seven years, Mandamus Petitioner Klein has traced the largest vulture, Girod LOANCO, from Montreal to the Cayman Islands and has documented every aspect of the corruption at hand. On February 27, this High Court will consider ways and means to bring a conclusion to the manifest thievery Mandamus Petition Klein has exposed.

**1. The Hunter Private Investigation December 13, 2024 Report.**

Although the investigative report sponsored by Mandamus Petitioner Klein has been provided to all courts below, it is submitted herewith for the perspective it provides. At the February 27 conference, the Justices should consider the totality of circumstances and grant 28 U.S.C. § 2106 relief pursuant to *Lawrence v. Chater*, 516 U.S. 163 (1996).

**2. The Memorandum to Louisiana Attorney-General Liz Murrill.**

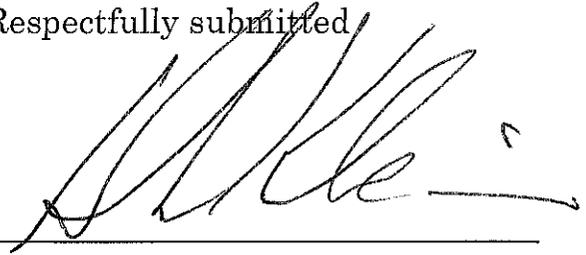
Equally significant is Mandamus Petitioner Klein's effort to have the Louisiana Attorney General take action against the foreign tax-evaders without success. The attached Memorandum was sent to (i) Louisiana AG Murrill, (ii) Louisiana Senators Bill Cassidy and John Kennedy, (iii) Louisiana Congressman Steve Scalise and (iv) DOGE, all without avail.

**3. Conclusion.** As Justice SCALIA put it in *Offutt v. United States*, 348 U.S. 11 (1954) "...Justice must satisfy the appearance of justice..." This Court should order GVR, sending this case to the Eastern District of Louisiana for enforcement of *Henson v. Santander* as Federalist 33 envisioned:

"It is said that the laws of the Union are to be the supreme law of the land. But what inference can be drawn from this or what would they amount to, if they were not to be supreme? **It is evident they would amount to nothing.**

Sadly in Louisiana, *Henson v. Santander* has "...amounted to nothing..." Mandamus Petitioner Klein is prepared to orally argue or do whatever this High Court deems appropriate in the face of unbridled corruption which no court of law has seen fit to end.

Respectfully submitted

A handwritten signature in black ink, appearing to read 'H. Klein', written over a horizontal line.

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