SUPREME COURT OF THE UNITED STATES

CASE NO:_____

KENNETH A. FRANK,
Petitioner,

v.

MICHAEL J. SATZ, et. al.,
Respondents.

_____/

ON PETITION FOR A WRIT OF CERTIORARI TO
THE FLORIDA SUPREME COURT

PETITION FOR WRIT OF CERTIORARI

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Miami, Florida 33194

QUESTIONS PRESENTED

1) Whether the Florida Supreme Court unelaborated denial of Petition for Writ of Quo Warranto denies Petitioner his rights to petition for redress of grievances and access to the Courts as guaranteed by the First Amendment to the United States Constitution.

2) Whether the Florida Supreme Court's unelaborated denial of Petition for Writ of Quo Warranto denied Defendant his right to due process within the meaning of the Fifth Amendment to the United States Constitution.

3) Whether the Florida Supreme Court's unelaborated denial of Petition for Writ of Quo Warranto denied or disparaged basic rights not enumerated in the Constitution that are retained by the people under the Ninth Amendment to the United States Constitution.

4) Whether the Florida Supreme Court's unelaborated denial of Petition for Writ of Quo Warranto denied Petitioner's rights to due process of law and denied Petitioner equal protection of laws within the meaning of the Fourteenth Amendment to the United States Constitution.

5) Whether the Florida Supreme Court's unelaborated denial of Petition for Writ of Quo Warranto abridges and/or violates Article 3 to the Fourteenth Amendment to the United States Constitution by permitting the State executive – judicial officers (Respondents) to engage in rebellion against the United States Constitution and oaths of the State office and the Florida Bar Association (FBA) requiring the Respondents to support and be faithful to the laws of the United States and the United States Constitution.[1]

6) Whether the Florida Supreme Court's unelaborated denial of Petition for Writ of Quo Warranto was contrary to, or involved an unreasonable application of clearly established Federal laws and/or rights, as determined by the United States Supreme Court, or (2) was based on an

[1] "Rebellion" is defined in Random House Webster's Dictionary (2001 edition) as; "Defiance of [any] authority."

unreasonable determination of the facts, in light of the evidence presented in the State Court proceeding as held in *Early v. Parker*, 537 U.S. 3,7 (2002).

7) Whether the Florida Supreme Court's unelaborated denial of Petition for Writ of Quo Warranto was nothing more than a "rubber stamp" denial amounting to an abuse of discretion contrary to the holding in *Early v. Parker*, 537 U.S. 3, 7 (2002) and/or the United States Constitution.

8) Whether the Florida Supreme Court's unelaborated denial of Petition for Writ of Quo Warranto was an improper Order that interferes with Petitioner's appellate rights and/or rights guaranteed by the United States Constitution.

9) Whether the Florida Supreme Court's unelaborated denial of Petition for Writ of Quo Warranto amounts to a refusal to issue a detailed opinion which violated the free exercise clause of the First Amendment to the United States Constitution within the meaning of *Hobie v. Unemployment Appeals Commission of Florida*, 480 U.S. 136 (1987).

10) Whether the Florida Supreme Court's unelaborated denial of Petition for Writ of Quo Warranto invalidated Federal law including, but not limited to, the First, Fifth, Ninth and Fourteenth Amendments to the United States Constitution, especially violating the First Amendment's right to access to the Court.

11) Whether the Florida Supreme Court's unelaborated denial of Petition for Writ of Quo Warranto in this matter of great public importance with far reaching implications to the Constitution rights of millions of citizens of the United States as guaranteed by the United States Constitution has an appearance of impropriety within the meaning of *Early v. Parker*, 537 U.S. 3, 7 (2002).

12) Whether the Florida Supreme Court's unelaborated ("Rubber Stamp") denial of Petition for Writ of Quo Warranto amounts to a [shield of protection] for those in the Florida State Attorney's Office (SAO) who knowingly and intentionally violated Court rules, their oaths, and rights of citizens guaranteed by the United States Constitution by failing and refusing to maintain compliance with [mandatory] continuing legal education requirements (CLE's) and exercised the power of the State without lawful authority while [prohibited] [unauthorized] to practice law in contradiction to the Tennessee Supreme Court's holding in *Ramsey v. Board of Professional Responsibility of the Tennessee Supreme Court,* 777 S.W. 2d 116 (Tenn 1989), holding:

> "The office of the District Attorney constitutes no shield or protection for those who violated their oaths and Court rules, Judges and District Attorneys alike are subject to [mandatory] continuing legal education requirements." *Id.*

13) Whether the Florida Supreme Court's unelaborated denial of Petitioner's Motion for Clarification and detailed written opinion on unelaborated Order denying Petition for Writ of Quo Warranto violated clearly established rights guaranteed by the First, Fifth, Ninth and Fourteenth Amendments to the United States Constitution, including but not limited to, the free exercise clause of the First Amendment within the meaning of *Hobbie v. Unemployment Appeals Commission of Florida*, 480 U.S. 136 (1987).

14) Whether the Florida Supreme Court's unelaborated denial of Petition for Writ of Quo Warranto and Motion for Clarification and detailed opinion violated Article III to the United States Constitution and Florida Supreme Court Rule 40 because the issue involved in the Petition for Writ of Quo Warranto is a matter of great public importance as it affects the constitutional rights of millions of citizens of the United States, thus, has far reaching consequences and implications which issues should be decided by the United States Supreme Court; or the United States Supreme Court should decide the important Federal question of constitutional rights

guaranteed by the United States Constitution because the Florida Supreme Court's decision is decided in way that conflicts with the requirements of decisions by the United States Supreme Court and the United States Constitution.

15) Whether the Florida Supreme Court's Order comports with United States Supreme Court cases requiring that remedies address and relate to the constitutional violation and be tendered to cure the condition that offends the Constitution.

16) Whether the Florida Supreme Court entered an unelaborated Order denying Petition for Writ of Quo Warranto to discriminate against Petitioner because he is a prisoner in Florida State Prison (FSP) which resulted in violation of *Bounds v. Smith*, 430 U.S. 817, 828 (1977) and/or the First Amendment guarantees of the rights to petition the government (Courts) for redress of grievances and access to the Courts and the Fifth and Fourteenth Amendment to due process of law, and equal protection of laws.

17) Whether the Florida Supreme Court's unelaborated Order has an appearance of impropriety involving a denial of rights to petition the government (Courts) for redress of grievances and access to the Courts guaranteed by the First Amendment and Fifth and Fourteenth Amendment rights to due process of law due to the [fact] the Florida Courts have consistently held that a challenge to a State Attorney or Assistant State Attorney's authority [must] be raised by Quo Warranto. See, e.g., *White v. State*, 464 So. 2d 185 (Fla. 3rd DCA 1985).

18) Whether the Florida Supreme Court's unelaborated Order denying Quo Warranto testing of the Respondent's (State Attorney's and Assistant State Attorney's) illegal – ultra vires exercise of the power of the State has violated the constitutional rights of millions of citizens of the United States as substantiated by the statistical records of the Florida Supreme Court.

LIST OF PARTIES

All parties to the action 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 are as follows:

1. Kenneth A. Frank, pro se Petitioner

RESPONDENTS

2. Michael J. Satz, State Attorney, Broward County
3. David Schulson, ASA Broward County
4. Jessalyn Rubio, ASA Broward County
5. Katherine Ferndandez Rundle, State Attorney Miami-Dade County
6. William Reich, ASA Miami-Dade County
7. Santiago Aroca, ASA Miami-Dade County
8. Jeanine Germanowicz, AAG, State of Florida
9. Ralph Larizza, State Attorney Putnam County
10. Hillarie Miller, ASA Putnam County
11. Aramis Ayala, ASA Orange County
12. Jeffrey Ashton, State Attorney Orange County
13. Monique Worrell, State Attorney Orange County
14. Linda Burdick, ASA Orange County
15. Frank George, ASA Orange County
16. Candra Moore, ASA Orange County
17. Lawson Lamar, State Attorney Orange County
18. Harold Pryor, State Attorney Broward County
19. Staci Direnzo, ASA Broward County
20. Carlos Leon, Bar counsel for the Florida Bar
21. Christopher Wackes, Bar counsel for the Florida Bar
22. Richard Coombs, Bar counsel for the Florida Bar
23. Shanel Schuyler, Bar counsel for the Florida Bar
24. Natalie Snyder, ASA Miami-Dade County
25. Vicoria Watson, ASA 8th Judicial Circuit
26. Brian Kramer, State Attorney 8th Judicial Circuit
27. Andriene Ellis, ASA Palm Beach County
28. Chrichet Mixon, Asa Palm Beach County
29. Niccole Chappone, ASA Broward County
30. Carolyn McCann, ASA Broward County
31. Jeff Marcus, ASA Broward County
32. Larry Basford, State Attorney 14th Judicial Circuit
33. Dennis Ward, State Attorney 16th Judicial Circuit
34. Andrew Warren, State Attorney 13th Judicial Circuit
35. David Aronberg, State Attorney Palm Beach County

36. William Busch,
37. Thomas Bakkedahl, State Attorney 19th Judicial Circuit
38. Amira Fox, State Attorney 20th Judicial Circuit
39. Bradley King, ASA 5th Judicial Circuit
40. William Gula, ASA 5th Judicial Circuit
41. Ernest Kollra, ASA Broward County
42. John Campbell, State Attorney 2nd Judicial Circuit
43. Jonathan Sacks, ASA
44. Melissa Nelson, State Attorney 4th Judicial Circuit
45. Bruce Bartlett, State Attorney 6th Judicial Circuit
46. William Gladson, ASA 5th Judicial Circuit
47. Bradley King, State Attorney 5th Judicial Circuit
48. William Gula, ASA 5th Judicial Circuit
49. Ginger Madden, State Attorney 1st Judicial Circuit
50. John Durrett, State Attorney 3rd Judicial Circuit
51. Brian Hass, State Attorney 10th Judicial Circuit
52. Lisa Horley, Bar counsel for the Florida Bar
53. Joi Pearsall, Bar counsel for the Florida Bar
54. Arlene Senkel, Bar counsel for the Florida Bar
55. Jennifer Falcone, Bar counsel for the Florida Bar
56. Cecilia Terenzio, AAG for the State of Florida
57. Tali Fish, ASA Broward County.

CORPORATE DISCLOSURE STATEMENT

No party to this proceeding is a corporation having present corporations or publicly held companies owning 10% or more of the corporations stock.

RELATED CASES

Kenneth A. Frank v. Michael J. Satz, et. al., case number: SC2025-085f4 in the Supreme Court of the State of Florida.

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PETITION FOR A WRIT OF CERTIORARI

Petitioner Kenneth A. Frank (Hereinafter "Petitioner" or "Frank") pro se, respectfully petitions this Honorable Court for a Writ of Certiorari to review the Florida Supreme Court's decision in this case.

OPINIONS BELOW

The Florida Supreme Court's underlying September 03, 2025 unelaborated opinion denying Petition for Quo Warranto which sought to test this Respondent(s) (State actors) right, privilege and/or authority to exercise the power of the State as prosecuting attorney's through the practice of law. The Order appears at Exhibit 'A' in the Appendix.

The Florida Supreme Court's October 14, 2025 unelaborated Order denying Petitioner's Motion for Clarification and detailed written opinion regarding the Court's unelaborated opinion of September 03, 2025 denying the Petition for Writ of Quo Warranto, and treating the Motion as an unauthorized Motion for Rehearing and striking the Motion. The Order appears in the Appendix as Exhibit B.

JURISDICTION

The jurisdiction of this Court is invoked under 28 U.S.C. 125(1).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The First Amendment to the United States Constitution provides that:

> Guarantees freedom of religion, freedom of speech, freedom of the press, freedom of assembly, and the right to Petition the government for redress of grievances, including the U.S. Constitution, First Amendment.

The Fifth Amendment to the United States Constitution provides in pertinent part:

> No person shall be deprived of life, liberty or property without due process of law. U.S. Constitution, Fifth Amendment

The Ninth Amendment to the United States Constitution provides in pertinent part that:

> The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people. U.S. Constitution Ninth Amendment.

The Fourteenth Amendment to the United States Constitution provides that:

> Section 1: All persons born or naturalized in the United States and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or embrace any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the law. U.S. Constitution Fourteenth Amendment.
>
> Section 3: No person shall be a senator or representative in congress or elector of present and vice president, or hold any office, civil or military, under the United States, or under any State, who, having previously taken an oath, as a member of congress, or as an officer of the United States, or as a member of any State Legislature, or as an executive or judicial officer of any State, to support the Constitution of the United States, shall have engaged in insurrection or rebellion against the same… U.S. Constitution, Fourteenth Amendment.

The Ninth Amendment to the United States Constitution provides in pertinent part:

> The enumeration in the Constitution, of certain rights, shall not be construed to deny of disparage others retained by the people. U.S. Constitution, Ninth Amendment.
>
> 42 U.S.C. 1983 provides in pertinent part: Every person who under any color of any statute ordinance, regulation, custom or usage, of any State or territory or the District of Columbia, subjects, any citizen of the United States… Deprivation of any rights, privileges, or immunities secured by the Constitution or laws, shall be liable to the party injured in an action at law, suit in equity, or other proceeding for redress…

Rule 10 of the rules of the United States Supreme Court provides in pertinent part:

> Considerations governing review of Certiorari are that: Review on a Writ of Certiorari is not a matter of right, but of judicial discretion. A Petition for Writ of Certiorari will be granted only for

> compelling reasons. The following, although neither controlling nor fully measuring the Court's discretion, indicate the character of the reasons the Court considers:
>
> (b) A State Court of last resort has decided an important Federal question in a way that conflicts with the decision of another State Court of last resort or of a United States Court of Appeals'
>
> (c) A State Court...has decided an important question of Federal law that has not been, but should be, settled by this Court, or has decided an important Federal question in a way that conflicts with relevant decisions of this Court.

THRESHOLD MATTER

Petitioner respectfully invokes the pleading standards for pro se litigants set forth by this Honorable United States Supreme Court in *Haines v. Kerner*, 404 U.S. 579 (1976). *Haines* affords pro se litigants procedural latitude, and requires Petitioner's arguments to be interpreted to raise the strongest arguments they suggest.

STATEMENT OF THE CASE

BACKGROUND

Through extensive investigation, the Petitioner has developed irrefutable evidence that the Florida State Attorney's office statewide is infested with State Attorney's (SA'S) and Assistant State Attorney's (ASA's) who are knowingly and intentionally [illegally] exercising authority derived from the State of Florida – "without lawful authority" – because these State actors (SA's and ASA's) who are the 57 respondents are [prohibited][unauthorized] to practice law due to non-compliance with[mandatory] continuing legal education requirements (CLE's) in direct violation of self-executing Fla. Bar Rule 1-3.6. Florida Bar Rule 1.3.6 [prohibits] those attorneys who are not complaint (the 57 Respondent SA's and ASA's) from exercising the right, power and authority derived from the State to practice law, therefore, and consequently depriving the Respondent State actors of lawful authority to exercise the power derived from the State of Florida State Attorney's Office (SAO) to bring criminal prosecutions, in the State of Florida and to exercise the privilege to practice law in the state of Florida that was derived from the State, because the power/authority/privilege was [lost][forfeited] when the State actors (Respondents) failed and refused to maintain the minimum [Mandatory] continuing legal education requirements (CLE's); Fla. Bar Rule 1-3.6. See, Respondent(s) (State actors) CLE history which appears in Petition for Writ of Quo Warranto filed in the Florida Supreme Court as Exhibits 1 to 54, which demonstrates the [unauthorized] practice of law and illegal exercise of the power of the State of Florida at Exhibit D in Appendix, and incorporated herein by reference.

FACTS

STATISTICAL RECORDS MAINTAINED BY THE FLORIDA SUPREME COURT EVIDENCE MILLIONS OF [ILLEGAL][UNCONSTITUTIONAL] CRIMINAL PROSECUTIONS BROUGHT BY RESPONDENTS WHO WERE WITHOUT LAWFUL AUTHORITY TO EXERCISE THE POWER OF THE STATE OF FLORIDA

The following analysis is a statistical example of [illegal] criminal prosecutions brought by Respondents SA Katherine Fernandez Rundle in Miami-Dade County and SA Michael J. Satz in Broward County, Florida in the years 2016, while [prohibited][unauthorized] to practice law, and [illegally] exercising the power of the State to wit:

YEARS 2015-2016

Miami-Dade County (11th Judicial Circuit) – 95,000 criminal cases filed. Broward County (17th Judicial Circuit) – 52, 000 criminal cases filed.

Total criminal cases filed – 147,000 (Miami and Broward)

www.floridacourts. Gen/publications-statistics- annual reports-archives

Respondent Attorney (SA) Katherine Fernandez Rundle (Miami-Dade County, Florida) became [unauthorized] to practice law in the State of Florida on 05/01/2009. Therefore, unauthorized to exercise the power derived from the State to bring criminal prosecutions in Miami-Dade County, Florida. (See Exhibit 4 to Petition for Writ of Quo Warranto appearing in Appendix as Exhibit D).

Respondent State Attorney (SA) Michael J. Satz (Broward County, Florida) became [unauthorized] to practice law in the State of Florida on 11/30/2008. Therefore, unauthorized to exercise the power derived from the State to bring criminal prosecutions in Broward County, Florida. (See, Exhibit 1, to Petition for Writ of Quo Warranto appearing in Appendix as Exhibit D).

Both the State Attorney's Fernandez-Rundle (Miami-Dade County) and Michael J. Satz (Broward County) who are the subjects of this statistical analysis of 'illegal criminal prosecutions' have been unlawfully and improperly exercising the power derived from the State to bring about criminal prosecutions in the State of Florida while [prohibited][unauthorized] to practice law for more than 17 years and counting.

Mathematically extrapolating out the 'illegal criminal prosecutions' over a period of 15 years and counting in Miami-Dade and Broward County, Florida alone demonstrates more than 800,000 [illegal] criminal prosecutions were brought, which criminal prosecutions offended the United States Constitution. This illegal prosecution also offended the constitutional rights of more than 800,000 of citizens. (emphasis added).

Based on the Florida Supreme Court's own statistical analysis it shows that the Respondent State actors (SA's and ASA's) statewide have brought about 'millions and millions' of [illegal] prosecutions and continue to do so without lawful authority to exercise the power of the State which offended the United States Constitution millions of times, and offended the constitutional rights of millions of citizens of the United States.

THE CONSTITUTIONAL RIGHTS OF MILLIONS OF CITIZENS OF THE UNITED STATES HAVE BEEN VIOLATED BY THE RESPONDENTS [ILLEGAL] EXERCISE OF POWER DERIVED FROM THE STATE

It is axiomatic, whether enumerated or unenumerated, that every citizen of the United States is vested with constitutional rights privileges and immunities in criminal prosecutions that include the right to [only] be prosecuted by a State actor authorized to exercise the power of the State. These rights are guaranteed collectively though the first, Fifth, Sixth, Ninth, and Fourteenth Amendments to the United States Constitution.

At issue in this case, is the violation, abridgement, and denial of rights of millions of United States citizens guaranteed by the First, Fifth, Sixth, Ninth, and Fourteenth Amendments to the United States Constitution, by agents of the State of Florida (State Attorney's (SA's) and Assistant State Attorney's (ASA's)) who had lost and/or forfeited the right and/or authority to exercise the power derived from the State, to wit:

At all times material, the 57 Respondents who are either State Attorney's (SA's) or Assistant State Attorney's (ASA's) were [prohibited][unauthorized] to practice law in the State of Florida, therefore, unqualified to hold State office and exercise the power of the State, in that: Being [prohibited][unauthorized] to practice law invalidated their right, privilege and/or authority to exercise/use the power derived by the State to deprive [any] United States citizen of their liberty. As guaranteed by the due process clause of the Fifth and Fourteenth Amendments of the United States Constitution. See, *Thompson v. Governor DeSantis*, 301 So. 3d 180 (Fla. 2020) (A lawyer who is suspended from the practice of law does not satisfy the requirement to hold government office).

Here, as the statistical records maintained by the State of Florida Supreme Court evidence, the 57 Respondent State Attorney's (SA's) and Assistant State Attorney's (ASA's) knowingly and intentionally unlawfully exercised the power of the State to violate the Constitutional rights privileges and immunities of millions of citizens of the United States and continue to do so, by, 'without lawful authority' and 'unauthorized to practice law' bringing about what can only be described as [millions] of constitutionally prohibited criminal prosecutions against citizens of the United States, in this: This is a matter of great public importance and public interest with far reaching constitutional implications that should be considered by this Honorable Court.

As long ago, as 1917, this Court observed that one who exercises the power of the State 'without lawful authority' to bring about a criminal prosecution is in contravention to the United States Constitution. *Fellows ex. rel. Union Trust Co.*, 61 L. Ed 1233 (1917).

The question in controversy is a matter of great public importance affecting the constitutional rights, privileges and immunities of millions of United States citizens that involves the legal right of State sanctioned State Attorney's (SA's) and Assistant State Attorney's (ASA's) to exercise the power derived from the State to criminally prosecute millions of United States citizens and deprived them of their liberty while [prohibited][unauthorized] to practice law.

PETITIONER FRANK'S STANDING TO BRING THE UNDERLYING PETITION FOR WRIT OF QUO WARRANTO

Under Florida Law, an action seeking the issuance of a Writ of Quo Warranto "to question the authority for exercise of rights, privileges [,] and powers derived from the State can be brought by [any] person." *MacNamara v. Kissimmee River Valley Sportsman's Ass'n*, 648 So. 2d 155, 164 (Fla. 2nd DCA 1994). When the Petitioner seeks the enforcement of a public right in Quo Warranto proceedings, the individual or individuals bringing suit also need not have a real or personal interest. See *State ex rel. Pooser v. Wester*, 170 So. 736, 737 (Fla. 1936).

If this Petitioner states a prima facie ground for relief, the Court will issue the Writ of Quo Warranto. Fla. R. Civ. P. 1.630(d)(3). The writ commands the Respondents to grant the relief requested or to answer the allegations in the petition justifying the authority in question. At this point, the Petitioner must serve the petition and writ on Respondents. *Id.*

The Florida Supreme Court has repeatedly stated that the focus in Quo Warranto cases is to question whether a State officer has improperly exercised a power or right derived from the

State. *W. Flagler Assoc., LLC v. DeSantis*, 382 So. 3d 1284, 1286 (Fla. 2024) (citations and internal quotations omitted) (emphasis added), citing a collection of cases on issue.

On or about June 10, 2025, Petitioner Frank commenced an action in Quo Warranto in the Supreme Court of the State of Florida under case number: SC2025-0854 against the 57 Respondent SA's and ASA's (collectively 'Respondents') pursuant to Article 5, Section 3(b)(7)(8) and Fla. R. App. P. 9.030(a)(3) seeking the entry of a Writ of Quo Warranto, and in the alternative, application for a constitutional writ and "all writs" necessary to enjoin illegal, 'unconstitutional' ultra vires actions or Respondents and asserting that:

The Respondent State actors were disqualified from holding State office and disqualified from exercising the power of the State of Florida's State Attorney's Office (SAO) to bring about criminal prosecutions against citizens of both the State of Florida and United States because:

The Respondents had lost and/or forfeited their right, privilege and/or authority to practice law in the State of Florida which is a necessary and mandatory requirement to hold the office of State Attorney (SA) and/or Assistant State Attorney (ASA), therefore, the Respondents were exercising and continue to exercise power derived from the State Attorney's office – "without lawful authority."[2]

Stated another way, the Petition for Writ of Quo Warranto sought to 'test' the Respondents right, privilege and/or authority to (1) hold public office, (2) to exercise the power of the State Attorney's office, and (3) to test the Respondents lawful right to deprive both citizens of the State of Florida and the United States of their liberty within the meaning of the Fifth and Fourteenth Amendments to the United States Constitution. For a full and further recitation of the grounds and argument for Quo Warranto with 'irrefutable evidence' attached

[2] The Petition for Writ of Quo Warranto also sought to test the right, privilege and/or authority of a few of the Respondent State actors to hold office and exercise the power of the State of Florida Attorney General's office and the Florida Bar Association.

proving that the Respondents were illegally and unconstitutionally exercising the power of the State of Florida to deprive citizens of the United States of their constitutional rights, the Petition for Writ of Quo Warranto appears as Exhibit D in the Appendix, and is incorporated herein by reference.

Petitioner Frank verily believes that the Petition for Quo Warranto that was filed in the Florida Supreme Court was legally sufficient within the meaning of the words Quo Warranto relief and/or real consideration.

The Florida Supreme Court issued an unelaborated decision on September 03, 2025, denying the Petition for Quo Warranto. The Order further stated that no Motion for Reconsideration would be considered. The Order appears as Exhibit A in the Appendix and is incorporated herein by reference.

In 2006, the Florida Supreme Court held that a per curiam opinion violated both Federal and State rights to 'access to the Courts' as guaranteed by the First Amendment to the United States Constitution and Article 1, Section 21, Fla. Constitution. The Florida Supreme Court further stated that the District Court of Appeals per curiam opinion that was under review 'invalidated constitutional rights.' See, *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006). See also, *McBride v. State*, 443 So. 2d 416 (Fla. 4th DCA 1984)(Holding, failure to issue a proper legal Order interferes with appellate rights). The Florida Supreme Court's unelaborated opinion invalidated the constitutional rights of millions of United States citizens.

PETITIONER MOVED FOR CLARIFICATION AND A DETAILED WRITTEN OPINION

In *Jackson v. State*, 926 So. 2d 1262 (Fla. 2006), the Florida Supreme Court also broadened the rule for which a party may permissibly seek a written opinion of a per curiam denial.

Because the Petitioner Frank recognizes that the Florida Supreme Court 'unelaborated Order denying Petition for Quo Warranto' ultimately amounted to a denial of access to the Courts violative of the First Amendment to the United States Constitution guarantee of rights to petition the government for redress of grievances and access to the Court which also otherwise and further interfered with his appellate rights in this Court, the Petitioner Frank felt it was appropriate to file a Motion for Clarification and detailed written opinion.

Therefore, Petitioner filed a Motion for Detailed Written Opinion and Clarification. The Motion for Clarification and Detailed Written Opinion appears as Exhibit C in the Appendix, and is incorporated herein by reference.

On October 14, 2025, the Florida Supreme Court entered an Order treating Petitioner's Motion for Clarification and detailed written opinion as a Motion for Reconsideration and struck the Motion as unauthorized. The Order appears as Exhibit B in the Appendix, and is incorporated herein by reference.

Petitioner Frank respectfully states that there is a serious 'appearance of impropriety' that should be attributed to the Florida Supreme Court's unelaborated Order denying Quo Warranto, i.e., refusing to even permit the State actors exercise of the power of the State to even be tested. In light of the 'irrefutable evidence' that was attached to the Petition for Writ of Quo Warranto in the form of the official records of the Florid Bar (FBA) demonstrating that the Respondents were illegally exercising the power of the State, it certainly is fair to state there is at least the 'appearance of impropriety' in this case. It is also reasonable to treat the Florida Supreme Court's unelaborated Order as having the affect of permitting and assisting an illegal prosecutorial scheme that has violated the constitutional rights of literally millions of citizens of the United States to continue on unfettered, unchallenged and uninterrupted, in that: This

Honorable Court should view this Florida Supreme Court's Order as "Rambo Style" and view said Orders with a "Jaundiced Eye."

REASONS FOR GRANTING CERTIORARI IN THIS CASE

This Honorable Court should grant Certiorari in this case for the following compelling reasons:

(1) The Florida Supreme Court has decided an important Federal question in a way that conflicts with the decisions of numerous other Courts of last resort, including but not limited to, the Supreme Courts of Wisconsin, Colorado, Missouri, Kansas, and Pennsylvania, as well as, many United States Courts of Appeal, as described further below and otherwise in this petition;

(2) The Florida Supreme Court has decided an important question of Federal law in a way that conflicts with relevant decisions of this Court and the United States Constitution, including but not limited to the following:

- *Hobbie v. Unemployment Appeals Commission of Florida*, 480 U.S. 136 (1987) (Reversing the Florida 5th District Court of Appeals per curiam affirmance), and holding: The Florida Supreme Court's refusal to render a detailed written opinion violated the First Amendment guarantees of the rights to petition the Courts for redress of grievances and access to the Courts and applying the "Strict Scrutiny Test;"
- *Fellows ex. rel. Union Trust Co.*, 61 L. Ed. 1233 (1917) granting Certiorari where the actions taken by Respondents in exercising the power of State – 'without unlawful authority' to bring about millions of [illegal] criminal prosecutions is in contravention to the United States Constitution.
- *Boyd v.* Nebraska, 143 U.S. 155, a proceeding in Quo Warranto where this Honorable Court took jurisdiction because the conclusion of the State Court (in this case the

Florida Supreme Court) involved a [denial] of a right, privilege or immunity under the United States Constitution and laws of the United States, in this case: The conclusion of the Florida Supreme Court deprives Petitioner Frank and millions of other citizens of the United States of their rights, privileges and immunities guaranteed by the United States Constitution and laws of the United States. This Honorable Court has jurisdiction to issue a Writ of Error. See also, *Puerto Rico v. Hermanos,* 309 U.S. 543-550 (1940) (This Court addressed Quo Warranto proceedings).

- *Johnson* v. Manhattan Ry. Co., 289 U.S. 479, 502-504 (1933) where this Court observed that a Quo Warranto action is 'properly' brought against a person who is charged with exercising an office of authority without legal right.
- See again, *Hobbie v. Unemployment Appeals Commission of Florida,* 480 U.S. 136 (1987), holding that Certiorari lies when the State Court has not been explicit in the rejection of the constitutional claims raised. See also, R. Stern, E. Stern & Shapiro, Supreme Court practice 112 (6th Ed. 1986).
- *Home Tel. & Tel. Co. v. Los Angeles*, 127 U.S. 278 (1913) holding, that a State officer cannot proceed upon assumption of State power to accomplish wrong for purpose of avoiding the application of the Eleventh Amendment.
- *Early v. Parker*, 537 U.S. 3, 7 (2002) holding, that Certiorari is warranted where like in this case that: The Florida Supreme Court's decision is contrary to, or involves an unreasonable application of, clearly established Federal law, as determined by the United States Supreme Court, or (2) 'is based on an unreasonable determination of the facts,' in light of the evidence presented in the State Court proceeding, and because –

Respectfully the Florida Supreme Court's unelaborated decision which clearly ignores the irrefutable evidence that the Respondents were illegally exercising the power of the State that was annexed to the Petition for Writ of Quo Warranto is nothing more than a 'rubber stamp' denial without any real consideration amounting to an abuse of discretion and a denial of rights to petition the government for redress of grievance and denial of access to the Courts as guaranteed by the First Amendment to the United States Constitution, due process of law as guaranteed by the Fifth and Fourteenth Amendments, and contrary to this Honorable Court's holding in *Early v. Parker*, 537 U.S. 3, 7 (2002).

(3) The Florida Supreme Court ultimately decided important Federal questions involving constitutional rights and otherwise affecting millions of citizens of the United States that should have been decided by this Court.

(4) This case presents concerns, gravity, and great public importance and/or interest involving the constitutional rights of Petitioner Frank and the constitutional rights of millions of other citizens of the United States similarly situated and affected by the Respondents illegal, ultra vires exercise of the power of this State.

(5) There are far reaching implications to constitutional rights of millions of United States citizens that need to be decided by this Honorable Court.

(6) Because at stake here are the First, Fifth, Sixth, Ninth and Fourteenth Amendments to the United States Constitution.

(7) Because the conclusion of the Florida Supreme Court involves a [denial] of rights, privileges and immunities under the Constitution and laws of the United States within the meaning of *Boyd v. Nebraska*, 143 U.S. 155.

(8) Because Certiorari lies in the fact that the Florida Supreme Court failed to be explicit in its rejection of the constitutional claims raised.

(9) Because the Florida Supreme Court's unelaborated opinion deprived Petitioner of the rights to petition the government for redress of grievances, access to the Courts and due process in violation of the First, Fifth, Ninth and Fourteenth Amendments to the United States Constitution under color of State law in violation of 42 U.S.C. 1983.

(10) Because the Florida Supreme Court's unelaborated denial of Petition for Quo Warranto [invalidated] Petitioner Frank's constitutional rights and those rights of millions of citizens of the United States as guaranteed by the United States Constitution.

(11) Because the Florida Supreme Court's unelaborated opinion denying the Petition for Writ of Quo Warranto without [any] real consideration amounts to a failure of the Court to honor its sworn duty to protect the rights to petition the Courts for redress of grievances and access to the Courts guaranteed by the First Amendment to the United States Constitution and violation of this Court's directive in *Hobbie*, 480 U.S. 136 (1987), and as further set forth in the questions presented and as further set forth below:

RULE 10 ANALYSIS

As follows Certiorari is proper and warranted within the meaning of the Honorable Court's Rule 10, in that:

The Court's Rule 10 entitled "considerations governing review on Certiorari" says that Certiorari will be granted only for compelling reasons, *City & Cnty of San Francisco v. Sheehan*, 575 U.S. 600, 619 (2015), and sets forth situations that can weigh in favor of Certiorari, although they are neither controlling nor fully measuring the Court's discretion," *Brown v. United States,* 139 S. Ct. 14, 16 n.5 (2018).

According to Rule 10, among the compelling reasons which tend to weigh in favor of Certiorari induce cases where "a State Court of last resort has decided an important Federal question in a way that conflicts with the decision of another State Court of last resort," as well as those where a "State Court...has decided an important question of Federal law," inter alia. See Rule 10, United States Supreme Court.

BASIS FOR CERTIORARI

In addition to the compelling reasons for granting Certiorari that are enumerated as 1 to 11 above; in accordance with foregoing Rule 10 analysis, there are more detailed 'compelling reasons' for Certiorari which are set out below with more specificity.

In the case at bar, involving Quo Warranto, the Florida Supreme Court unquestionably decided important Federal – constitutional questions in a "Rambo Style" way that conflicts with the decisions of other State Courts of last resort and the United States Court of Appeals involving constitutional rights (of millions) guaranteed by the United States Constitution and decided important questions of constitutional law and rights (of millions0 that should be decided by this Court, and the Florida Supreme Court decided the matter in a way that conflicts with relevant decisions of this Court.

THE FLORIDA SUPREME COURT FAILED AND REFUSED TO PERMIT THE STATE ATTORNEY'S OFFICE ILLEGAL AND ULTRA VIRES EXERCISE OF THE POWER OF THE STATE TO BE TESTED IN THE STATE COURTS IN VIOLATION OF THE UNITED STATES CONSTITUTION

In direct violation of the United States Constitution, the Florida Supreme Court improperly failed and refused to permit a Quo Warranto testing of the State Attorney's Office's unlawful – ultra vires exercise of the power of the State (See, Appendix at Exhibits A-C).

The failure to allow Quo Warranto testing (proceedings) is not only in departure from its own repeated adjudications upon the question of the State's exercise of power involved in *Frank*

v. Michael J. Satz, et. al., under case number SC2025-0854 (Exhibit D) in the Supreme Court of the State of Florida, it is also a failure and refusal to hear a matter of great public importance and of general interest involving not only Petitioner Frank, but involving the constitutional rights of millions of citizens of the United States, as well as, a failure and refusal to protect the constitutional rights of millions of citizens of the United States as guaranteed by the United States Constitution. Stated another way, the Florida Supreme Court condoned illegal government misconduct and turned a blind eye to the United States Constitution and the Constitution of millions of citizens of the United States. See, *Borden Inc. v. Young*, 479 So. 2d 850, 851 (Fla. 3rd DCA 1985)(A Court cannot condone prosecutorial misconduct or a prosecutor's violations of the rules regulating the Florida Bar). See also *Baker v. Ensign*, 2016 U.S. Dist. LEXIS (S.D. Cal. 2016)(Exercising one's constitutional rights is a matter of great public importance), and the condition of our nation's persons is a matter of great public importance. See, *Kqed, Inc. v. Houchins*, 546 F. 2d 284 (9th Cir. 1976). [3]

The decision of the Florida Supreme Court not to permit Quo Warranto testing has far reaching implications and effect. If Petitioner Frank is correct based on the 'irrefutable evidence' presented with the Petition for Quo Warranto (Appendix at D), the Respondents (State Attorneys and Assistant State Attorneys, etc.) have knowingly and intentionally engaged in a systematic ongoing scheme of fraudulent and unlawful exercise of the power of the State of Florida's State Attorney's Office (SAO) in a way that has violated the constitutional rights of millions of citizens of the United States for years and years and continues unfettered, undeterred, uninterrupted and 'untested.' The State of Florida SAO has been corrupted and infiltrated at the highest levels with an illegal ultra vires exercise of the power of the State.

[3] At stake here, is the First, Fifth, Ninth and Fourteenth Amendments to the United States Constitution, which is a matter of great public importance. See, *Goycite v. City of Minneapolis*, 338 F.D.R. 109 (D. Min. 2021).

THE FLORIDA SUPREME COURT'S DEPARTURE FROM ITS OWN ADJUDICATIONS

The Florida Supreme Court has repeatedly stated that the focus in Quo Warranto cases is to question "whether a State officer has improperly exercised a power or right of the State.' See, *W. Flagler Associates, LLC v. DeSantis,* 382 So. 3d 1284, 1286 (Fla. 2004)(citations added), but failed and refused to follow its own adjudications in this case.

THIS COURT HAS DETERMINED QUO WARRANTO TESTING TO BE AN IMPORTANT MATTER IN CONSTITUTIONAL LAW

This Court has explained that a Writ of Quo Warranto "is addressed to preventing a continued exercise of authority unlawfully asserted..." *Johnson v. Manhattan Ry. Co.*, 289 U.S. 479, 509 (1933), and "[T]he Federal common law remedy has been available in connection with proceedings over an individual's right to hold office or position." *Sundance Land Corp. v. City First Fed Sav. & Loan Ass'n*, 840 F. 2d 653, 665 (9th Cir. 1988). See also, *Bayard v. White*, 127 U.S. 250 (1887) (*Bayard v. White*, 127 U.S. 250 (1887) (Quo Warranto is proper remedy to challenge one's entitlement to hold office), also, *United States v. Smith*, 286 U.S. 6-49 (1932) (This Court granted Certiorari to review a judgment denying a Petition for Writ to [test] the authority to hold public office).[4]

As long ago, as 1900 in *Taylor v. Beckham*, 178 U.S. 548 (1900), a case in Quo Warranto challenging eligibility to the office of governor, this Court took jurisdiction because the conclusion of highest State Court denied the Petitioner a right or privilege guaranteed by the United States Constitution (emphasis added). See also, *United States v. Smith*, 286 U.S. 6-49 (1932) (This Court granted Certiorari to review a judgment denying a Petition for Quo Warranto seeking to test the authority to hold office).

[4] See also, *Gardner v. California*, 393 U.S. 67 (1969), and *Griffin v. Illinois*, 357 U.S. 12 (1956) (both cases discussing the constitutional right of access to the Courts).

Here, the Florida Supreme Court's conclusion by unelaborated denial of the Petition for Quo Warranto (Exhibit A) which sought to [test] the Respondent State Attorney's (SA) and Assistant State Attorney's (ASA's) right and qualification to hold public office while [prohibited][unauthorized] to practice law in the State of Florida, in light of this evidence presented establishing that the Respondents were [illegally] exercising power derived from the Sate amounted to (1) denial of Petitioner Frank his inalienable rights, privileges and immunities to petition for redress of grievances and access to the Courts guaranteed by the First Amendment, due process of law guaranteed by the Fifth and Fourteenth Amendments along with denial of basic unenumerated rights guaranteed by the Ninth Amendment to the United States Constitution which acts in contravention to this Honorable Court's decisions in *Taylor v. Beckham*, 178 U.S. 548 (1900); *United States v. Smith,* 286 U.S. 6-49 (1932) and others cited herein, and (2) an ongoing violation of the due process rights of millions of other citizens of the United States guaranteed by the Fifth and Fourteenth Amendments to the United States Constitution which the Florida Supreme Court's unelaborated conclusion to deny Quo Warranto [testing] allows to continue unfettered, uninterrupted and "un-tested" in contravention to the United States Constitution and the decisions of this Court, in this: The Florida Supreme Court's conclusion and decision to issue an unelaborated denial of Quo Warranto [testing] is contrary to, and involves an unreasonable application of, clearly established Federal law and constitutional rights, as determined by this Court which amounted to an unreasonable determination of the facts, in light of the evidence presented in the Petition for Quo Warranto (Exhibit D) in the Florida Supreme Court, which is contrary to the United States Constitution and this Court's holding in *Early v. Paker*, 537 U.S. 3, 7 (2002).

Because the Florida Supreme Court has clearly acted in contravention to the United States Constitution, as well as, the constitutional rights of Petitioner and millions of other citizens of the United States it is respectfully requested that this Court grant Certiorari in this case.

THE FLORIDA SUPREME COURT HAS DECIDED IMPORTANT QUESTIONS OF CONSTITUTIONAL RIGHTS GUARANTEED TO PETITIONER AND MILLIONS OF UNITED STATES CITIZENS SIMILARLY SITUATED IN A WAY THAT CONFLICTS WITH NUMEROUS OTHER STATE COURTS OF LAST RESORT AND THE UNITED STATES COURTS OF APPEALS, ALSO, IN A WAY THAT CONFLICTS WITH RELEVANT DECISIONS OF THIS COURT AND THE UNITED STATES CONSTITUTION, AND THESE CONSTITUTIONAL MATTERS SHOULD ULTIMATELY BE DECIDED BY THIS HONORABLE COURT

To begin, this argument as to why this Honorable Court should grant Certiorari in this case it is important to mention again and reiterate here that both the Florida Supreme Court and the Governor of the State of Florida have previously determined that a lawyer who is suspended from the practice of law does not satisfy the requirement to hold government office in the State of Florida. See, *Thompson v. Governor DeSantis*, 301 So. 3d 180 (Fla. 2020), and the challenge to a State Attorney or Assistant State Attorney's authority should be raised in Quo Warranto. See, *White v. State*, 464 So. 2d 185 (Fla. 3rd DCA 1985), also *Snead v. State*, 415 So. 2d 857 (Fla. 5th DCA 1982).

Also worthy of mention again, is the Florida Supreme Court's repeated adjudications that the focus in Quo Warranto cases [is] to question "whether a State officer has improperly exercised a power or right of the State." See again, *W. Flagler Associates, LLC. V. DeSantis*, 382 So. 3d 1284, 1286 (Fla. 2024)(citations and internal quotation omitted) (emphasis added). See also, *Martinez v. Martinez*, 545 So.2d 1338 (Fla. 1989)(A Writ of Quo Warranto is the proper remedy under both Florida and Federal law for examining the authority of public officers and agencies).

This is precisely the Quo Warranto issue involved in this case, that was presented to the Florida Supreme Court; That the 57 Respondent State Attorneys and Assistant State Attorneys were [prohibited][unauthorized] to practice law, thus, were disqualified from holding public office and exercising the power derived from the State (Exhibit D), but nevertheless were engaged in a systematic ongoing unlawful-ultra vires exercise of the power of State. These are the facts and there are no others, which were supported by "irrefutable evidence" (Exhibit D)., and

Under these circumstances, [is] precisely why the lawful authority of the Respondents to exercise the power of State office needed to be [tested] in Quo Warranto. The Florida Supreme Court's refusal to permit the Quo Warranto testing and the unelaborated denial of the Petition for Quo Warranto reeks of impropriety. The unelaborated denial of Petition for Quo Warranto [testing] seems designed to provide a shield of protection for the Florida State Attorney's Office, this, must be looked at by this Honorable High Court with a "Jaundiced Eyes."

Moreover, the Florida Supreme Court's unelaborated denial of the Petition for Quo Warranto is in direct conflict with the decision of the other State Courts of last resort, the United States Courts of Appeals, this Honorable High Court, and the United States Constitution as set forth below:

THE CONFLICTS

CONFLICT 1: Kansas statutory law provides for Quo Warranto actions when "[any] person shall usurp, impede into or unlawfully hold or exercise any public office. Kan. Stat. Ann. 60-1202. An action in Quo Warranto is the proper vehicle, for example, for inquiring "into a person's authority to practice law." See, *State ex. rel. Morrison v. Price*, 285 Kan. 389, 172 P. 3d 561, 569 (Kan. 200); see also, *United States v. Ramos*, 2011 U.S. Dist. LEXIS 79482 (Dist. Ct.

D. Kan), also, *King v. State of Kansas*, 2010 U.S. Dist. LEXIS 89750 (D. Kan. 2010) (Where District Court took judicial notice of the Kansas Supreme Court's holding in *State ex. rel. Morrison v. Price*, 285 Kan 389, 172 P.3d 561 (Kan 2007) that *Price* was subject of a 'Quo Warranto' action wherein the Kansas Supreme Court enjoined him from the 'unauthorized practice of law.'

CONFLICT 2: See, *Wisconsin's Environmental Decree v. State Bar of Wisconsin*, 747 F. 2d 407 (7th Cir. 1987) where the United States Court of Appeals for the 7th Circuit used Petition for Writ of Quo Warranto to determine the "unauthorized practice of law."

CONFLICT 3: In 2022, the Colorado Supreme Court suspended the law license of the 11th Judicial District Attorney Linda Stanley for a failure to complete continuing legal education requirements (CLE's) stating that: "The performance of statutory duties and requirements of a … District Attorney [cannot] be achieved without an active law license," and "every District Attorney [shall] (emphasis added) appear on behalf of the State and the several counties of his or her District" in a multitude of courtroom appearances and other situations requiring an active law license to include but not limited to: [ALL] Indictments, and proceedings which may be pending in District Court. See, Court's Order in the matter of; in the interest of the people of the 11th Judicial District of Colorado and June 02, 2022 newspaper article titled "District Attorney Linda Stanley's license suspended" amended as Exhibit 55 to Petition for Quo Warranto in Appendix as Exhibit D.

CONFLICT 4: On December 31, 2024, in the matter of; *In re. Sean Teare*, the State Bar arm of the Texas Supreme Court suspended the Harris County, Texas District Attorney's law license for non-compliance with continuing legal education (CLE) requirements, and noting (1) according to records from the Harris County District Clerk's Office, more than 1,000 criminal

cases were [illegally] filed between January 1 and January 4 during the time of "Teare's license was suspended," and (2) "noting that District Attorney Teare could be removed from office by filing a 'Quo Warranto' action on grounds that Teare [unlawfully] held his office since State law requires District and County Attorneys to be 'licensed attorneys' (emphasis added). See Exhibit 55 to Petition for Writ of Quo Warranto annexed at Exhibit 55 and appearing in Appendix as Exhibit D.

CONFLICT 5: The Illinois Supreme Court (Disciplinary Commission) in the matter of; *In re Foxx*, suspended the Cook County State Attorney's license to practice law for failing to maintain minimum mandatory continuing legal education requirements (CLE's), and noted (1) that *Foxx* is 'unauthorized to practice law," and (2) that the Illinois Constitution [required] every elected State Attorney to be a "licensed attorney-at-law of the State." See, Exhibit 55 to Petition for Writ of Quo Warranto appearing in Exhibit D in Appendix.

CONFLICT 6: In the matter of *Ewell v. Florida*, Case Number 17-12107 (11th Cir. 2017), the United States Court of Appeals for the 11th Circuit found that "an Assistant State Attorney in the State of Florida was 'unauthorized to practice law' due to non-compliance with continuing legal education requirements (CLE's)." See, Petition for Writ of Quo Warranto at page 21 appearing in Appendix as Exhibit D.

CONFLICT 7: The Colorado Supreme Court in *People v. Park*, 478 P. 3d 259 (Colo. 2020), held: An attorney who fails to comply with continuing education requirements (CLE's) is [unauthorized to practice law] ...a deliberate blindness cannot excuse a lawyer from complying with CLE's. See, Petition for Writ of Quo Warranto at page 23, appearing as Exhibit D in Appendix.

CONFLICT 8: The Supreme Court of Colorado in *People v. Nelson*, 40 P. 3d 840 (Colo. 2002), held: An attorney who fails to comply with CLE's is [unauthorized to practice law]. *Nelson* was disbarred.

CONFLICT 9: The Arkansas Supreme Court in *Bailey v. Martin*, 433 S.W. 3d 904 (Ark. 2013), held (1) an attorney who fails to comply with CLE's is "unauthorized to practice law," and (2) in the question of suspension for failure to comply with continuing legal education requirements (CLE's) it would take too much "high jingo" to bend the [Constitution] or to give a second definition to suspend. See, Petition for Writ of Quo Warranto at page 21 appearing at Exhibit D in Appendix.

CONFLICT 10: The Wisconsin Supreme Court in *Fitzgerald v. Fitzgerald*, 2007 WI 111 (Wisc. 2007), held: A Wisconsin [prosecutor] "illegally" prosecuted criminal cases in the Villas County District Attorney's office "while automatically suspended" for non-compliance with continuing legal education requirements (CLE's). See, Petition for Writ of Quo Warranto at page 24 appearing at Exhibit D in Appendix.

CONFLICT 11: The Oklahoma Supreme Court in *State ex. rel. Bar Ass'n v. O'Neal*, 1993 Ok. 61,852 P. 2d 713 (Okla. 1993), held: Attorney publicly censored for "unauthorized practice of law" while suspension for ... non-compliance with CLE requirements. See, Petition for Writ of Quo Warranto at page 23 appearing at Exhibit D in Appendix.

CONFLICT 12: The Tennessee Supreme Court's decision in *Ramsey v. Board of Professional Responsibility of the Supreme Court of Tennessee*, 717 S.W. 2d 116 (Tenn. 1989), which is in conflict with the Florida Supreme Court's unelaborated holding in the case at bar, is worthy of special consideration where the Tennessee Supreme Court held: "*Ramsey* the District

Attorney General for Anderson County, Tenn. was suspended for [misconduct] before the Court and non-compliance with CLE's." The Court made the following apropos statement:

> "The Office of the District Attorney constitutes [no shield] or [protection] for one who violates his oath and Court rules. Judges and District Attorneys alike are subject to [mandatory] continuing legal education requirements."

The Tennessee Supreme Court's holding in *Ramsey*, supra is worthy of extraordinary consideration by this Honorable High Court because not only does it conflict with the Florida Supreme Court's 'unelaborated' holding in the case at bar, but also because the tenor of its language exemplifies "exactly' what the Florida Supreme Court's unelaborated denial of Quo Warranto testing (Exhibit A) represents and amounts to: The per se [protection] for the 57 Respondent State Attorneys (SA's) and Assistant State Attorneys (ASA's) who were [unauthorized to practice law], but nevertheless [illegally] exercising the power of the Florida State Attorney's Office (SAO) statewide, thus, a [shield] for the State Attorney's Office itself. This Petitioner prays that this Honorable High Court will treat this as a matter of great public importance that offends the United States Constitution, and a compelling reason to grant Certiorari.

See Petition for Writ of Quo Warranto at pages 10, 24-25 appearing at Exhibit D in Appendix.

CONFLICT 13: The Pennsylvania Supreme Court decision in *Office of Disciplinary Counsel v. Cooney*, 906 A. 2d 524 (PA 2006) is also in conflict with the Florida Supreme Court's unelaborated decision to deny Quo Warranto testing in the case at bar because the Pennsylvania Supreme Court held that an attorney who fails to maintain compliance with CLE's is [unauthorized to practice law] and in a related bankruptcy case, bankruptcy Court Judge Conelly

filed a disciplinary complaint against *Cooney* for 'unauthorized practice of law.' Indeed. *Cooney* was charged "criminally" with [unauthorized practice of law] and pled guilty. (emphasis added).

Indeed, based on the Pennsylvania Supreme Court's holding in *Cooney* and the action taken by United States Bankruptcy Court, Judge Conelly there is another and further matter of great public importance supplying a compelling reason for this Honorable Court to grant Certiorari, in that: The Florida Supreme Court's unelaborated denial of Quo Warranto testing has the per se affect of [protecting] and [shielding] the Respondent State Attorney's and Assistant State Attorney's from criminal prosecution for the [unauthorized practice of law], Fla. Stat. 454.23 and Fla. Stat. 454.31 (two felonies) and the resulting [unlawful] exercise of the powers derived from Florida State Attorney's Office.

THE CONFLICTS WITH RELEVANT DECISIONS OF THIS COURT AND THE UNITED STATES CONSTITUTION

Finally, in addition to all else, is the undeniable [fact] that the Florida Supreme Court has decided this matter of great public importance involving the Quo Warranto testing of Florida State Attorneys and Assistant State Attorneys right, privilege and authority to practice law and exercise the power of the State that affects the constitutional rights, privileges and immunities of millions of United States citizens in a way that is in direct conflict with the United States Constitution and a long relevant history of decisions handed down by this Court. The decisions of this Court that are implicated and conflicted, include but are not limited to the following:

1) In 1900, in *Taylor v. Beckham*, 178 U.S. 548 (1900), a case involving Quo Warranto challenging the eligibility of the Governor to hold public office the Court took jurisdiction because the conclusion of the Highest State Court denied the Petitioner a right or privilege guaranteed by the United States Constitution. *Id.*

This case is analogous, because the Florida Supreme Court's decision offends the United States Constitution, offends the constitutional rights, privileges and immunities of Petitioner Frank and offends the rights, privileges, and immunities of millions of citizens of the United States similarly situated with Petitioner who are victims of the State Attorneys and Assistant State Attorneys statewide systematic illegal- ultra vires exercise of the power of the State, in that: The First Amendment rights to petition the government for redress of grievance and access to the Courts, the Fifth and Fourteenth Amendment rights to due process and equal protection of law and all those basic unenumerated rights guaranteed by the Ninth Amendment to the United States Constitution.

2) The Florida Supreme Court's unelaborated denial of Quo Warranto is also in conflict with this Court's holding in *Boyd v. Nebraska*, 143 U.S. 155, where as here, this Court took jurisdiction in a proceeding in Quo Warranto because the conclusion of the Highest State Court involved a [denial] of a right or privilege under the Constitution and law of the United States. Clearly evident is the conclusion of the Florida Supreme Court by unadulterated unelaborated denial of Quo Warranto testing conflicts with *Boyd v. Nebraska*, supra, and the many analogous decisions holding that the State Court's decision amounted to a denial of constitutional rights. The Florida Supreme Court's refusal to permit Quo Warranto [testing] of the State actors right and authority to exercise the power of the State offended. (1) Article 1, Section 10 of the United States limiting State powers, (2) denied Petitioner access to the Court in Quo Warranto – without reason – and abridged the ability to petition the government for redress of grievance in direct conflict with the First Amendment to the United States Constitution, (3) abridged the Fifth Amendment to the United States mandating legal indictment of any citizen of the United States, i.e., due process because an Indictment by a State Attorney or Assistant State Attorney who is

'unauthorized to practice law,' thus, unauthorized to exercise the power of the State Attorney's Office (SAO) is not a valid Indictment, in this: The Respondent State Attorneys and Assistant State Attorneys abridged Petitioner rights and millions of other similarly situated citizens of the United States, (4) because the State Attorneys and Assistant State Attorneys were 'unauthorized to practice law,' thus, unauthorized to exercise the power of the States Attorney's office, the Petitioner and millions of other similarly situated citizens of the United States were denied all the protections of the Sixth Amendment right to a fair and impartial trials, (5) Petition and millions of other similarly situated citizens of the United States were subjected to 'cruel and unusual punishment' at the hands of Respondents who were [illegally] exercising the power of the State, (6) Petitioner and millions of other similarly situated citizens of the United States have been subjected to 'involuntary servitude' in violation of the Thirteenth Amendment at the behest of Respondents who were [illegally] exercising the power of the State of Florida's SAO, and (7) violates the Fourteenth Amendment protections prohibiting the State of Florida (Respondent SA's and ASA's) from depriving Petitioner and millions of other similarly situated citizens of the United States of liberty without due process and the equal protection of laws.

For these denials of constitutional rights, supra; *Boyd v. Nebraska*, 143 U.S. 155 warrants this Honorable Court to take jurisdiction and issue Writ of Error to the Florida Supreme Court.

3) Further, this Court has consistently observed throughout the years that citizens of the United States have a 'right' to test the right and authority by 'Quo Warranto' of [any] person who is exercising a State office or authority without lawful right. The Florida Supreme Court's unelaborated denial which refuses to permit Quo Warranto testing of the Respondent State Attorneys and Assistant State Attorneys unlawful right to exercise the power of the SAO is in direct conflict with *Johnson v. Marathon Ry. Co.*, 289 U.S. 479, 502-504 (1933); *Puerto Rico v.*

Hermanos, 309 U.S. 543-550 (1940) (permitting Quo Warranto testing); *Fellows v. Union Trust Co.,* 61 L. Ed. 1233 (1917)(dealing with the right in Quo Warranto to test the exercise of State powers by persons 'without lawful authority'); See again, *Boyd v Nebraska*, 143 U.S. 155 (where this Court took jurisdiction because the State's highest Court reached the wrong conclusion in Quo Warranto which involved a [denial] of constitutional right, as has happened in the case at bar); *Hobbie v. Unemployment Appeals Commission of Florida*, 480 U.S. 136 (1987) (Holding, Certiorari lies even where the Highest State Court was not explicit in rejection of constitutional claims); *Helm v. Zarelor,* 222 U.S. 32 (1913)(permitting Quo Warranto testing); *Taylor v. Becknam*, 178 U.S. 548 (1900)(A case in Quo Warranto where this Court took jurisdiction because the conclusion of the State's Highest Court denied the Petitioner rights guaranteed by the United States Constitution) *Bayard v. White*, 127 U.S. 250 (1887). (Quo Warranto is the proper remedy to challenge one's entitlement to hold office) and, *United States v. Smith*, 286 U.S. 6-49 (1932) (where this Court granted Certiorari to review a judgment denying a petition for Quo Warranto to [test] the authority to hold office.

4) As explained ad nauseum in this petition the Florida Supreme Court's unelaborated denial of Quo Warranto [testing] is in direct conflict with the principles enunciated by this Court in *Early v. Parker*, 537 U.S. 3, 7 (2002) granting Certiorari, where as here, the State Court of last resorts conclusions were (1) contrary to, or involved an unreasonable application of clearly established Federal law by this Court. Here, there is a clear unreasonable application of the constitutional rights of millions of citizens of the United States, present or (2) the State Court's conclusion was based on an unreasonable determination of the facts, in light of the evidence presented to the State Court. The Petitioner presented 'irrefutable evidence' to the Florida Supreme Court with the Petition for Quo Warranto testing, (Exhibit D) that: The official records

of the Florida Bar evidencing, beyond any and all doubt, that each of the 57 Respondent State Attorneys and Assistant State Attorneys were [prohibited][unauthorized] to practice law, therefore, [illegally] exercising the power of the State of Florida State's Attorney's Office (SAO). In light of said evidence, it is readily established that the Florida Supreme Court's unelaborated denial of Quo Warranto testing amounts to an 'unreasonable determination of the facts and evidence' within the meaning of *Early v. Parker*, 537 U.S. 3, 7 (2002), this, warranting Certiorari in this case.

5) The Florida Supreme Court's unelaborated denial of Quo Warranto testing is also in conflict with *Missouri v. Jenkins*,515 U.S. 70 (1995) because it fails to comport with the decisions of this Court [requiring] the remedies addressed the constitutional violation and tend to cure constitutional violation. Here, the Florida Supreme Court's unelaborated denial of Quo Warranto testing fails in every way to address the constitutional violations and clearly does 'absolutely nothing' to cure the complained of constitutional violations, in that conflicting with *Missouri v. Jenkins*, 515 U.S. 70 (1995), thus, warranting Certiorari; and

6) The conflict with *Bounds v. Smith*: The Petitioner is a prisoner in the Florida State prison (FSP) as a result of the State actor (Respondents) [unlawful] exercise of the power derived from the State of Florida's State Attorney's Office (SAO), as described herein. The Petitioner has prisoner's "rights to access to the Courts" as articulated by this Court in the landmark case of *Bounds v. Smith*, 430 U.S. 817, 828 (1977) as guaranteed by the First Amendment to the United States Constitution. Petitioner avers that the Florida Supreme Court's unelaborated denial of Quo Warranto testing is in direct conflict with *Bounds* and the First Amendment to the United States Constitution. This conflict alone warrants Certiorari in this case.

Petitioner's final point of contention – is to ask this Honorable Court to treat the 57 Respondent State Attorneys and Assistant State Attorneys knowing systematic years and years long [unlawful] exercise of the power of the State – infiltrating the SAO statewide at the highest levels – as a "[rebellion]" in direct violation of Article 3 of the Fourteenth Amendment to the United States Constitution against the United States Constitution and against the constitutional rights of millions of citizens of the United States, because the Respondents unconscionable years and years long [unlawful] exercise of power of the State of Florida's State Attorney's Office (SAO) fits squarely into the dictionary definition of "Rebellion," i.e. meaning the "defiance of authority." See , Random House – Webster's Dictionary (2001 Ed.) . In the case at bar, the Respondents "defied" the authority of the United States Constitution and the rights the Constitution guaranteed to millions of citizens of the United States, in that: A "Rebellion" in direct violation of Article 3, to the Fourteenth Amendment to the United States Constitution, which the Florida Supreme Court permitted to continue on unfeitered, unobstructed and "untested" due to the Florida Supreme Court's unelaborated denial of Quo Warranto testing. Petitioner further avers that this "Rebellion' warrants the granting of Certiorari to 'put it to an end.'

CONCLUSION

The denial of the constitutional rights of millions of United States citizens is a matter of great public importance if there ever was one. For the foregoing reasons, Petitioner Frank respectfully requests that this Honorable Court grant this Petition for Certiorari.

Respectfully submitted

Kenneth A. Frank, pro se
DC# I50962
Everglades Correctional Inst.
1599 S.W. 187th Avenue
Miami, Florida 33194

On behalf of himself and on behalf
of the United States Constitution

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that a true and correct copy of the foregoing document has been placed in prison officials hands for mailing via U.S. Postal Service to: Florida Supreme Court, 500 South Duval Street, Tallahassee, Florida 32399-1927 and United States Supreme Court, One First Street, N.E., Washington, D.C. 20543 on this 9TH day of January, 2026.

Kenneth A. Frank, pro se
DC# I50962
Everglades Correctional Inst.
1599 S.W. 187 Ave.
Miami, Florida 33194

SUPREME COURT OF THE UNITED STATES
CASE NO:_____

KENNETH A. FRANK,
Petitioner,

v.

MICHAEL J. SATZ, et. Al.,
Respondents.

_____/

ON PETITION FOR A WRIT OF CERTIORARI TO
THE FLORIDA SUPREME COURT

APPENDIX TO PETITION FOR WRIT OF CERTIORARI

Kenneth A. Frank # I50962
Pro Se
Everglades Correctional Inst.
1599 S.W. 187th Avenue
Miami, Florida 33194

APPENDIX A

Florida Supreme Court's Order denying Quo Warranto Testing

EXHIBIT A

Supreme Court of Florida

WEDNESDAY, SEPTEMBER 3, 2025

Kenneth A. Frank,
Petitioner(s)

SC2025-0854

v.

Michael Joseph Satz, et al.,
Respondent(s)

The petition for writ of quo warranto is hereby denied. No motion for rehearing will be considered by this Court.

CANADY, COURIEL, GROSSHANS, FRANCIS, and SASSO, JJ., concur.

A True Copy
Test:

SC2025-0854 9/3/2025

John A. Tomasino
Clerk, Supreme Court

SC2025-0854 9/3/2025

LC

Served:
SANTIAGO AROCA
DAVID ANDREW ARONBERG
JEFFREY LEE ASHTON
ARAMIS DONELL AYALA
THOMAS RICHARD BAKKEDAHL
HON. BRUCE L. BARTLETT

LARRY RYALS BASFORD
LINDA DRANE BURDICK
WILLIAM J. BUSCH
HON. JOHN EMMETT CAMPBELL
NICOLE L CHIAPPONE
RICHARD WAYNE COOMBS
STACI MARIE DIRENZO
HON. JOHN FOSTER DURRETT
ADRIENNE ELEXIS ELLIS
JENNIFER R. FALCONE
TALI FEISTMANN FISH
AMIRA DAJANI FOX
KENNETH A. FRANK
FRANK GEORGE
JEANINE MARIE GERMANOWICZ
WILLIAM MCDONALD GLADSON
WILLIAM CHARLES GULA
BRIAN WILLIAM HAAS
LISA BUZZETTI HURLEY
HON. BRAD E KING
HON. ERNEST ALBERT KOLLRA, JR.
BRIAN KRAMER
LAWSON LEDRAN LAMAR
RALPH LARIZZA
CARLOS ALBERTO LEON
GINGER BOWDEN MADDEN
JEFF A MARCUS
CAROLYN VERONICA MCCANN
HILLARIE MILLER
CHRICHET B MIXON
CANDRA ANNE MOORE
MELISSA WILLIAMSON NELSON
JOI L. PEARSALL
HAROLD FERNANDEZ PRYOR, JR.
WILLIAM PATRICK REICH

JESSALYNN CHRISTINE RUBIO
HON. KATHERINE FERNANDEZ RUNDLE
HON. JONATHAN DAVID SACKS
ARLENE SANKEL
MICHAEL JOSEPH SATZ
DAVID HENDRICKS SCHULSON
SHANELL M SCHUYLER
NATALIE LYNN SNYDER
CONSIGLIA TERENZIO
CHRISTOPHER STEPHEN WACKES
DENNIS WILLIAM WARD
ANDREW H. WARREN
VICTORIA ALICE WATSON
MONIQUE HAUGHTON WORRELL

APPENDIX B

Florida Supreme Court's Order denying Motion for Clarification
and Detailed Written Opinion

Supreme Court of Florida

TUESDAY, OCTOBER 14, 2025

Kenneth A. Frank,
Petitioner(s)

v.

Michael Joseph Satz, et al.,
Respondent(s)

SC2025-0854

Petitioner's "Motion for Clarification and Detailed Written Opinion" has been treated as a motion for rehearing, and pursuant to this Court's order dated September 3, 2025, said motion is hereby stricken as unauthorized.

A True Copy
Test:

SC2025-0854 10/14/2025

John A. Tomasino
Clerk, Supreme Court
SC2025-0854 10/14/2025

LC

Served:
SANTIAGO AROCA
DAVID ANDREW ARONBERG
JEFFREY LEE ASHTON
ARAMIS DONELL AYALA
THOMAS RICHARD BAKKEDAHL
HON. BRUCE L. BARTLETT
LARRY RYALS BASFORD

HON. KATHERINE FERNANDEZ RUNDLE
HON. JONATHAN DAVID SACKS
ARLENE SANKEL
MICHAEL JOSEPH SATZ
DAVID HENDRICKS SCHULSON
SHANELL M SCHUYLER
NATALIE LYNN SNYDER
CONSIGLIA TERENZIO
CHRISTOPHER STEPHEN WACKES
DENNIS WILLIAM WARD
ANDREW H. WARREN
VICTORIA ALICE WATSON
MONIQUE HAUGHTON WORRELL

APPENDIX C

Motion for Clarification and
Detailed Written Opinion

KENNETH A. FRANK - DC NO. I50962
EVERGLADES CORRECTIONAL FACILITY
1599 SW 187TH AVENUE
MIAMI, FLORIDA 33194 - 2801

NOVEMBER 09, 2025

SUPREME COURT OF FLORIDA
ATTN: OFFICE OF THE CLERK
500 SOUTH DUVAL STREET
TALLAHASSEE, FLORIDA 32399

RE: KENNETH A. FRANK V. MICHAEL J. SATZ, ET. AL.
CASE NO. SC2025 - 0854

DEAR CLERK:

PETITIONER HAS FILED A MOTION FOR WRITTEN OPINION IN THE ABOVE CAPTIONED CASE. IT HAS COME TO MY ATTENTION THAT THE MOTION MAY HAVE BEEN DENIED.

HOWEVER, I HAVE RECEIVED NO SUCH ORDER AT THE EVERGLADES CORRECTIONAL FACILITY. CAN YOU PLEASE ADVISE ME IN WRITING IF THE MOTION FOR WRITTEN OPINION IS STILL BEING CONSIDERED BY THE COURT. IF, IN FACT, THE MOTION HAS BEEN DENIED WOULD YOU PLEASE SUPPLY ME WITH A COPY OF THE ORDER.

LASTLY, WOULD YOU PLEASE RETURN TO ME A STAMPED RECEIVED COPY OF THIS LETTER.

THANK YOU FOR YOUR VALUABLE TIME IN ATTENTION HERETO. I AWAIT YOUR RESPONSE.

SINCERELY,

IN THE SUPREME COURT OF FLORIDA

KENNETH A. FRANK — CASE NO., SC2025-0854

PETITIONER

V.

MICHAEL JOSEPH SAAD, ET. AL.

RESPONDENTS.

MOTION FOR CLARIFICATION AND DETAILED WRITTEN OPINION

PETITIONER KENNETH A. FRANK ('FRANK'), PRO SE HEREBY MOVES THE HONORABLE COURT PURSUANT TO FLA. R. APP. P. 9.330 (B) AND (D) FOR CLARIFICATION OF THE COURT'S SEPTEMBER 03, 2025 PER CURIUM ORDER DENYING PETITION FOR WRIT OF QUO WARRANTO AND FOR DETAILED WRITTEN OPINION, AND IN SUPPORT STATES THE FOLLOWING:

1. ON SEPTEMBER 03, 2025, THIS HONORABLE COURT ISSUED AN UNELABORATED PER CURIUM DECISION DENYING PETITIONER'S PETITION FOR WRIT OF QUO WARRANTO. THIS ORDER SETS FORTH THAT NO MOTION FOR RECONSIDERATION WILL BE CONSIDERED. Id.

2. FIRST, AS A HOUSE-KEEPING MATTER; THE COURT ENTERED THIS ORDER DENYING QUO WARRANTO ON SEPTEMBER 03, 2025. PETITIONER DID NOT RECEIVE THIS ORDER VIA REGULAR UNITED STATES MAIL AT THE EVERGLADES CORRECTIONAL INSTITUTION UNTIL SEPTEMBER 09, 2025. THE STATUTORY 15 DAY TIME LIMIT FOR FILING THIS MOTION SHOULD BE CALCULATED FROM SEPTEMBER 09, 2025 IN THE INTEREST OF JUSTICE.

SHOULD EXERCISE ITS DISCRETION TO GRANT QUO WARRANTO WHEN THE CRITERIAS ARE MET. SEE, 21 FLA. PRAC. ELEMENTS OF AN ACTION, ELEMENTS OF THE PRIMA FACIE CASE FOR A WRIT OF QUO WARRANTO SEC. 1703:1 (2021-2022 ED); CITING AMONG OTHER CASES, WHITLEY V. SCOTT, 79 So. 3d 702 (FLA 2011); FLORIDA ASS'N OF PROFESSIONAL LOBBYISTS V. DIVISION OF LEGISLATION INFORMATON SERVICES, 7 So. 3d 511 (FLA. 2009); FLORIDA HOUSE OF REPRESENTATIVES V. CRIST, 999 So. 2d 601 (FLA 2008), AND MARTINEZ V. MARTINEZ, 545 So. 2d 1338 (FLA 1989).

6. PETITIONER FILED A PETITION FOR QUO WARRANTO THAT EASILY SATISFIED THE ABOVE SET OUT ELEMENTS AND CRITERIA FOR A WRIT OF QUO WARRANTO TO ISSUE. THE PETITION FOR WRIT OF QUO WARRANTO IS INCORPORATED HEREIN BY REFERENCE.

7. THE PETITION FOR QUO WARRANTO FILED INQUIRED INTO THE AUTHORITY OF MORE THAN 50 STATE ATTORNEY'S (SA'S) AND/OR ASSISTANT STATE ATTORNEY'S (ASA'S) AS TO (1) WHETHER THEY WERE IMPROPERLY EXERCISING THE POWER AND RIGHT TO PRACTICE LAW DERIVED FROM THE STATE, AND (2) BECAUSE THERE IS EVIDENCE THAT THE 50 PLUS RESPONDENTS WERE [PROHIBITED] FROM PRACTICING LAW, WHETHER THE RESPONDENTS WERE IMPROPERLY AND ILLEGALLY EXERCISING THE POWERS OF THE STATE ATTORNEY'S OFFICE (SAO). THE PETITION SET FORTH THAT THE RESPONDENTS WERE [PROHIBITED] FROM PRACTICING LAW DUE TO THEIR FAILURE AND REFUSAL TO COMPLY WITH MINIMUM [MANDATORY] CONTINUING LEGAL EDUCATION REQUIREMENTS (CLE'S) IN VIOLATION OF SELF-EXECUTING FLORIDA BAR RULE 1-3.6.

8. THE OFFICIAL CONTINUING EDUCATION RECORDS (CLE'S) AS MAINTAINED BY THE FLORIDA BAR ASSOCIATION (FBA) WERE ATTACHED TO THE PETITION FOR WRIT OF QUO WARRANTO ESTABLISHING BEYOND ANY AND

IN VIOLATION OF SELF-EXECUTING FLA. BAR. RULE 1-3.6 AND THEREFORE WAS [PROHIBITED] FROM PRACTICING LAW IN THIS STATE, THUS, IMPROPERLY AND ILLEGALLY EXERCISING THE RIGHT TO PRACTICE LAW IN THIS STATE AND IMPROPERLY AND ILLEGALLY EXERCISING THE POWER OF THE STATE ATTORNEY'S OFFICES (SAO). PETITIONER SUBMITTED FURTHER EVIDENCE THAT THE FLORIDA BAR WAS SHIRKING ITS DUTY AND OBLIGATION TO ENFORCE THE RULES REGULATING THE FLORIDA BAR.

12. IN ADDITION, PETITIONER REFERENCED THE STATISTICAL RECORDS MAINTAINED BY THIS COURT IN THE PETITION. THESE STATISTICAL RECORDS SHOW THAT WHILE THE PROSECUTORS WERE [PROHIBITED] FROM PRACTICING LAW THEY HAVE BROUGHT [MILLIONS] OF [ILLEGAL CRIMINAL PROSECUTIONS], WHICH VIOLATED THE FEDERAL AND STATE CONSTITUTIONAL RIGHTS OF [MILLIONS] OF CITIZENS OF THE STATE OF FLORIDA AND UNITED STATES OF AMERICA GUARANTEED BY BOTH THE UNITED STATES AND FLORIDA CONSTITUTIONS. IF THERE EVER WERE A MATTER OF GREAT PUBLIC IMPORTANCE REQUIRING THE ISSUANCE OF A WRIT OF QUO WARRANTO — THIS WAS IT. PETITIONER MET THE CRITERIA FOR QUO WARRANTO TO ISSUE.

13. DESPITE, THE FACTS THAT PETITIONER MET THE REQUIREMENTS FOR A WRIT OF QUO WARRANTO TO ISSUE, THE PRIMARY IMPORTANCE OF THE ISSUE TO THE PUBLIC, THE STRONG EVIDENCE OF WRONG DOING, THE VIOLATION OF CONSTITUTIONAL RIGHTS OF MILLIONS OF CITIZENS OF BOTH THE STATE OF FLORIDA AND UNITED STATES OF AMERICA, THE CONFLICT WITH CONSTITUTIONAL RIGHTS AND DECISIONS OF THE UNITED STATES SUPREME COURT, THE DENIAL OF THE 1ST AMENDMENT RIGHT TO PETITION THE GOVERNMENT FOR REDRESS OF GRIEVANCES AND ACCESS TO THE COURTS, AND THE "HARMFUL"

17. By issuing the unelaborated denial the court has essentially denied petitioner his rights to petition the government for redress of grievances and access to the courts as guaranteed by the 1st amendment to the united states constitution and corresponding provisions of the florida constitution - this court overlooked the strong evidence of wrong doing.

18. Finally, a detailed written opinion is necessary because this per curiam denial hinders petitioner's appellate rights.

19. In Jackson v. State, 926 So. 2d 1262 (Fla 2006), this honorable court broadened the rules for which a party may permissibly seek a written opinion following the issuance of a per curiam denial. Petitioner avers that the reasons for seeking a written opinion are valid, permissible and in the best interest of the public at large who have a 9th amendment right guaranteed by the united states constitution to 'expose government corruption'.

conclusion

20. In the interest of justice, for the millions of citizens of the state of florida and united states of america who have been adversely affected by the illegal - unconstitutional ultra vires acts of the respondents and whose constitutional rights guaranteed by both the united states and florida constitutions have been violated this court should issue a detailed written opinion explaining its reasons for denying the petition for writ of quo warranto.

1) RESPONDENTS KATHERINE FERNANDEZ RUNDLE, SANTIAGO AROCA, WITHAM REICH AND NATALIE SNYDER (11TH JUDICIAL CIRCUIT) AT THE OFFICE OF THE MIAMI-DADE SAO LOCATED AT 1350 NORTHWEST 12TH AVENUE, MIAMI, FLORIDA 33136

2) RESPONDENTS MICHAEL J. SATZ, DAVID SCHULSON, HAROLD F. PRYOR, STACI DIRENZO, JESSELYN 'JACKIE' RUBIO, JEFF MARKUS, CAROLYN MCCANN, NICOLE CHIPPIANO, ERNEST C. KOURA AND TARJI FISH (17TH JUDICIAL CIRCUIT) AT THE OFFICE OF THE BROWARD SAO LOCATED AT 201 SE 6TH STREET, FORT LAUDERDALE, FLORIDA 33301.

3) RESPONDENTS MONIQUE WORRELL, LAWSON LAMAR, CAMERA MOORE, FRANK GEORGE, WILLIAM JAY, ARAMIS D. AYALA, JEFFREY ASHTON, AND LINDA BURDICK (9TH JUDICIAL CIRCUIT) AT THE OFFICE OF THE ORANGE COUNTY SAO LOCATED AT 415 N. ORANGE AVENUE, ORLANDO, FLORIDA 32802.

4) RESPONDENTS R.J. LARIZZA AND HILLARIE MILLER (7TH JUDICIAL CIRCUIT) AT THE OFFICE OF THE PUTNAM SAO LOCATED AT 410 ST. JOHNS AVENUE, ROOM 109, PALATKA, FLORIDA 32177.

5) RESPONDENTS SHANNELL M. SCHUYLER, CARLOS A. LEON, CHRISTOPHER WACKES, RICHARD W. COOMBS, ARLENE SANKEL, JENNIFER FALCONE, JOE L. PERSALL AND LISA HURLEY AT THE OFFICE OF THE FLORIDA BAR ASSOCIATION (FBA) LOCATED AT 651 EAST JEFFERSON STREET, TALLAHASSEE, FLORIDA 32399-2300.

6) RESPONDENT AMIRA FOX (20TH JUDICIAL CIRCUIT), 2000 MAIN STREET, 6TH FLOOR, FORT MYERS, FLORIDA 33901.

16) Respondent Melissa Nelson (4th Judicial Circuit), 330 East Bay Street, 6th Floor, Duval County Courthouse, Room 600, Jacksonville, Florida 32202.

17) Respondent John Durrett (3rd Judicial Circuit), 100 S.E. Court Street, Live Oak, Florida 32064

18) Respondent John Campbell (2nd Judicial Circuit), Leon County Courthouse, 301 South Monroe Street, Suite 475, Tallahassee, Florida 32399

19) Respondent Ginger Madden (1st Judicial Circuit), 190 Government Center, Pensacola, Florida 32501.

20). Respondents Cecilia Terenzio and Jeffanne Gutmanowitz (Attorney General's Office), 515 North Flagler Drive, Ninth Floor, West Palm Beach, Florida 33401.

By: _____

Kenneth A. Frank DC No. 150762
Everglades Correctional Facility
1599 SW 187th Avenue
Miami, Florida 33194-2801.

IN THE SUPREME COURT OF FLORIDA

KENNETH A. FRANK — CASE NO. SC 2025-0854

Petitioner

v.

MICHAEL JOSEPH SAITZ, et. al.

Respondents.

MOTION FOR CLARIFICATION AND DETAILED WRITTEN OPINION

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IN VIOLATION OF SELF-EXECUTING FLA. BAR RULE 1-3.6 AND THEREFORE WAS [PROHIBITED] FROM PRACTICING LAW IN THIS STATE, THUS, IMPROPERLY AND ILLEGALLY EXERCISING THE RIGHT TO PRACTICE LAW IN THIS STATE AND IMPROPERLY AND ILLEGALLY EXERCISING THE POWER OF THE STATE ATTORNEY'S OFFICES (SAO). PETITIONER SUBMITTED FURTHER EVIDENCES THAT THE FLORIDA BAR WAS SHIRKING ITS DUTY AND OBLIGATION TO ENFORCE THE RULES REGULATING THE FLORIDA BAR.

12. IN ADDITION, PETITIONER REFERENCED THE STATISTICAL RECORDS MAINTAINED BY THIS COURT IN THE PETITION. THESE STATISTICAL RECORDS SHOW THAT WHILE THE PROSECUTORS WERE [PROHIBITED] FROM PRACTICING LAW THEY HAVE BROUGHT [MILLIONS] OF [ILLEGAL CRIMINAL PROSECUTIONS], WHICH VIOLATED THE FEDERAL AND STATE CONSTITUTIONAL RIGHTS OF [MILLIONS] OF CITIZENS OF THE STATE OF FLORIDA AND UNITED STATES OF AMERICA GUARANTEED BY BOTH THE UNITED STATES AND FLORIDA CONSTITUTIONS. IF THERE EVER WERE A MATTER OF GREAT PUBLIC IMPORTANCE REQUIRING THE ISSUANCE OF A WRIT OF QUO WARRANTO — THIS WAS IT. PETITIONER MET THE CRITERIA FOR QUO WARRANTO TO ISSUE.

13. DESPITE, THE FACTS THAT PETITIONER MET THE REQUIREMENTS FOR A WRIT OF QUO WARRANTO TO ISSUE, THE PRIMARY IMPORTANCE OF THE ISSUE TO THE PUBLIC, THE STRONG EVIDENCE OF WRONG DOING, THE VIOLATION OF CONSTITUTIONAL RIGHTS OF MILLIONS OF CITIZENS OF BOTH THE STATE OF FLORIDA AND UNITED STATES OF AMERICA, THE CONFLICT WITH CONSTITUTIONAL RIGHTS AND DECISIONS OF THE UNITED STATES SUPREME COURT, THE DENIAL OF THE 1ST AMENDMENT RIGHT TO PETITION THE GOVERNMENT FOR REDRESS OF GRIEVANCES AND ACCESS TO THE COURTS, AND THE "HARMFUL"

17. By issuing the unelaborated denial the court has essentially denied petitioner his rights to petition the government for redress of grievances and access to the courts as guaranteed by the 1st Amendment to the United States constitution and corresponding provisions of the Florida constitution. This court overlooked the strong evidence of wrong doing.

18. Finally, a detailed written opinion is necessary because the per curiam denial hinders petitioner's Appellate rights.

19. In Jackson v. State, 926 So. 2d 1262 (Fla 2006), this Honorable court broadened the rules for which a party may permissibly seek a written opinion following the issuance of a per curiam denial. Petitioner avers that the reasons for seeking a written opinion are valid, permissible and in the best interest of the public at large who have a 9th Amendment right guaranteed by the United States constitution to 'expose government corruption'.

Conclusion

20. In the interest of justice, for the millions of citizens of the State of Florida and United States of America who have been adversely affected by the illegal - unconstitutional ultra vires acts of the respondents and whose constitutional rights guaranteed by both the United States and Florida constitutions have been violated this court should issue a detailed written opinion explaining its reasons for denying the petition for writ of quo warranto.

1) RESPONDENTS KATHERINE FERNANDEZ RUNDLE, SANTIAGO AROCA, WITHAM REICH AND NATALIE SNYDER (11TH JUDICIAL CIRCUIT) AT THE OFFICE OF THE MIAMI-DADE SAO LOCATED AT 1350 NORTHWEST 12TH AVENUE, MIAMI, FLORIDA 33136

2) RESPONDENTS MICHAEL J. SATZ, DAVID SCHULSON, HAROLD F. PRYOR, STACI DIRENZO, JESSELYN 'JACKIE' RUBIO, JEFF MARRUS, CAROLYN MCCANN, NICOLE CHIPPIANO, ERNEST C. KOURA AND TALIT FISH (17TH JUDICIAL CIRCUIT) AT THE OFFICES OF THE BROWARD SAO LOCATED AT 201 SE 6TH STREET, FORT LAUDERDALE, FLORIDA 33301.

3) RESPONDENTS MONIQUE WORRELL, LAWSON LAMAR, CAMERA MOORE, FRANK GEORGE, WILLIAM JAY, ARAMIS D. AYALA, JEFFREY ASHTON, AND LINDA BURDICK (9TH JUDICIAL CIRCUIT) AT THE OFFICE OF THE ORANGE COUNTY SAO LOCATED AT 415 N. ORANGE AVENUE, ORLANDO, FLORIDA 32802.

4) RESPONDENTS R.J. LARIZZA AND HILLARIES MILLER (7TH JUDICIAL CIRCUIT) AT THE OFFICE OF THE PUTNAM SAO LOCATED AT 410 ST. JOHNS AVENUE, ROOM 109, PALATKA, FLORIDA 32177.

5) RESPONDENTS SHANNELL M. SCHUYLER, CARLOS A. LEON, CHRISTOPHER WACKES, RICHARD W. COOKS, ARLENE SANKEL, JENNIFER FALCONE, JOE L. PEARSALL AND LISA HURLEY AT THE OFFICE OF THE FLORIDA BAR ASSOCIATION (FBA) LOCATED AT 651 EAST JEFFERSON STREET, TALLAHASSEE, FLORIDA 32399-2300.

6) RESPONDENT AMIRA FOX (20TH JUDICIAL CIRCUIT), 2000 MAIN STREET, 6TH FLOOR, FORT MYERS, FLORIDA 33901.

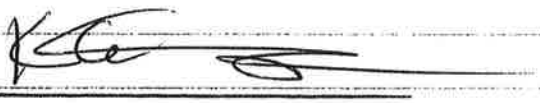
16) Respondent MELISSA NELSON (4TH JUDICIAL CIRCUIT), 330 EAST BAY STREET, 6TH FLOOR, DUVAL COUNTY COURTHOUSE, ROOM 600, JACKSONVILLE, FLORIDA 32202.

17) Respondent JOHN DURRETT (3RD JUDICIAL CIRCUIT), 100 S.E. COURT STREET, LIVE OAK, FLORIDA 32064

18) Respondent JOHN CAMPBELL (2ND JUDICIAL CIRCUIT), LEON COUNTY COURTHOUSE, 301 SOUTH MONROE STREET, SUITE 475, TALLAHASSEE, FLORIDA 32399

19) Respondent GINGER MADDEN (1ST JUDICIAL CIRCUIT), 190 GOVERNMENT CENTER, PENSACOLA, FLORIDA 32501.

20). Respondents CECILIA TERENZIO AND JEANNIE GERMANOWITZ (ATTORNEY GENERAL'S OFFICE), 515 NORTH FLAGLER DRIVE, NINTH FLOOR, WEST PALM BEACH, FLORIDA 33401.

By: 

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Additional material from this filing is available in the Clerk's Office.