

In the
Supreme Court of the United States

GEOFFREY M. YOUNG,

Petitioner,

v.

ANDY BESHEAR, ET AL.,

Respondents.

On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Sixth Circuit

**BRIEF IN OPPOSITION OF RESPONDENT
JUDGE JEREMY MATTOX**

Melissa Norman Bork

Counsel of Record

Robert L. Whitmer

DENTONS BINGHAM GREENEBAUM LLP

3500 PNC Tower

101 South Fifth Street

Louisville, KY 40202

(502) 589-4200

melissa.normanbork@dentons.com

bobby.whitmer@dentons.com

QUESTION PRESENTED

Whether certiorari should be denied where the Petitioner's claims are barred by the statute of limitations, immunity, constitute an impermissible collateral attack on a state court judgment, fail to state a claim under *Twombly* and *Iqbal*, and are part of a documented pattern of vexatious litigation previously sanctioned by multiple courts.

PARTIES TO THE PROCEEDINGS

Petitioner

- Geoffrey M. Young

Respondent on this Brief in Opposition

- Judge Jeremy Mattox

Other Respondents

- Andy Beshear, Governor of Kentucky
- Kentucky Democratic Party
- Fayette County Democratic Party
- Andy Barr, Kentucky Representative
- Republican Party of Fayette County
- Republican Party of Clark County
- Kentucky Educational Television

CORPORATE DISCLOSURE STATEMENT

Pursuant to Supreme Court Rule 29.6, Respondent Judge Jeremy Mattox is an individual.

LIST OF PROCEEDINGS

Pursuant to Supreme Court Rule 15.2, Judge Mattox identifies the following directly related cases not identified in Young’s Petition for Writ of Certiorari or otherwise as required in Supreme Court Rule 14.1 (b)(iii).

Related Proceeding

- *Young v. Beshear*, No. 3:23-CV-00024-GFVT, 2024 WL 3969352 (E.D. Ky. Aug. 28, 2024)
- *Young v. Beshear*, No. 3:23-CV-0024-GFVT, 2025 WL 1348917 (E.D. Ky. May 8, 2025)
- *Young v. Beshear*, No. 25-5467, 2025 WL 4733010 (6th Cir. Dec. 22, 2025)

TABLE OF CONTENTS

	Page
QUESTION PRESENTED	i
PARTIES TO THE PROCEEDINGS	ii
CORPORATE DISCLOSURE STATEMENT	ii
LIST OF PROCEEDINGS.....	iii
TABLE OF AUTHORITIES	vi
OPINIONS BELOW	1
STATEMENT OF THE CASE.....	1
A. Factual Background.....	1
B. Procedural History	2
REASONS FOR DENYING THE PETITION	5
I. The Questions Presented Do Not Warrant This Court’s Review	5
II. The Lower Courts Correctly Applied Well- Established Law to Dismiss Young’s Claims Against Judge Mattox	6
A. Young’s Claims Are Time-Barred	6
B. Judge Mattox Is Entitled to Eleventh Amendment Immunity	7
C. Judge Mattox Is Entitled to Absolute Judicial Immunity	7
D. Young’s Claims Constitute an Impermissible Collateral Attack on a State Court Judgment.....	8
E. Young Failed to State a Claim	8

TABLE OF CONTENTS (Cont.)

	Page
III. This Case Is a Particularly Poor Vehicle for Certiorari Review	9
IV. The Petition Is Frivolous and Part of a Pattern of Vexatious Litigation	10
CONCLUSION.....	11

TABLE OF AUTHORITIES

	Page
CASES	
<i>Anderson v. Dickson</i> , 715 F. App'x 481 (6th Cir. 2017)	4, 11
<i>Ashcroft v. Iqbal</i> , 556 U.S. 662 (2009)	i, 5, 9
<i>Ashelman v. Pope</i> , 793 F.2d 1072 (9th Cir. 1986)	8
<i>Bell Atlantic Corp. v. Twombly</i> , 550 U.S. 544 (2007)	i, 5, 9
<i>Collard v. Kentucky Bd. of Nursing</i> , 896 F.2d 179 (6th Cir. 1990)	7
<i>Collyer v. Darling</i> , 98 F.3d 211 (6th Cir. 1996)	7
<i>District of Columbia Court of Appeals v.</i> <i>Feldman</i> , 460 U.S. 462 (1983)	8
<i>Eidson v. State of Tennessee Dep't of Children's</i> <i>Servs.</i> , 510 F.3d 631 (6th Cir. 2007)	7
<i>Forrester v. White</i> , 484 U.S. 219 (1988)	7
<i>Gutierrez v. Lynch</i> , 826 F.2d 1534 (6th Cir. 1987)	9
<i>Hans v. Louisiana</i> , 134 U.S. 1 (1890)	7
<i>In re Sun Valley Foods Co.</i> , 801 F.2d 186 (6th Cir. 1986)	8
<i>Jaco v. Bloechle</i> , 739 F.2d 239 (6th Cir. 1984)	9

TABLE OF AUTHORITIES (Cont.)

	Page
<i>Kentucky v. Graham</i> , 473 U.S. 159 (1985)	7
<i>Larry E. Parrish, P.C. v. Bennett</i> , 989 F.3d 452 (6th Cir. 2021)	11
<i>Million v. Raymer</i> , 139 S.W.3d 914 (Ky. 2004)	6
<i>Mireles v. Waco</i> , 502 U.S. 9 (1991)	7
<i>Quern v. Jordan</i> , 440 U.S. 332 (1979)	7
<i>Stump v. Sparkman</i> , 435 U.S. 349 (1978)	7, 8
<i>Susselman v. Washtenaw Cnty. Sheriff's Off.</i> , 109 F.4th 864 (6th Cir. 2024)	9
<i>Young v. Beshear</i> , No. 25-5467, 2025 WL 4733010 (6th Cir. Dec. 22, 2025)	3, 4, 6, 9, 11
<i>Young v. Beshear</i> , No. 3:23-CV-00024-GFVT, 2024 WL 3969352 (E.D. Ky. Aug. 28, 2024)	3
<i>Young v. Beshear</i> , No. 3:23-CV-00024-GFVT, 2025 WL 1348917 (E.D. Ky. May 8, 2025) ...	3, 10
<i>Young v. Overly</i> , No. 3:16-CV-00062-GFVT, 2017 WL 4355561 (E.D. Ky. Sept. 29, 2017), <i>aff'd</i> , No. 17-6242, 2018 WL 5311408 (6th Cir. July 2, 2018)	10

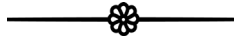
TABLE OF AUTHORITIES (Cont.)

	Page
CONSTITUTIONAL PROVISIONS	
U.S. Const. amend. XI	7, 9, 11
STATUTES	
42 U.S.C. § 1983.....	2, 3, 6, 7, 8, 9
Ky. Rev. Stat. § 118.176(2)	8
Ky. Rev. Stat. § 413.140(1)(a).....	6
JUDICIAL RULES	
Sup. Ct. R. 10	5, 12
Sup. Ct. R. 14.1(b)(iii)	iii
Sup. Ct. R. 15.2	iii
Sup. Ct. R. 29.6	ii



OPINIONS BELOW

The opinion of the Sixth Circuit is unreported and unpublished and is reproduced in full in the appendix to Young’s Petition. (Pet.App. a11–a23). The Memorandum and Order of the U.S. District Court for the Eastern District of Kentucky, Central Division at Frankfort, is also unreported and unpublished and is reproduced in full in the appendix to Young’s Petition. (Pet.App. a38–a56).



STATEMENT OF THE CASE

A. Factual Background

Petitioner Geoffrey M. Young (“Young”) is a *pro se* litigant and perennial unsuccessful candidate for public office who has filed a litany of lawsuits alleging conspiracies to rig elections against him. He has filed at least eleven similar lawsuits and forty related appeals—all of which have been dismissed. [R. 15-1; R. 15-2.] He has been sanctioned multiple times by state and federal courts for his frivolous and vexatious filings. [R. 15-3, Page ID# 431–32; R. 15-4, Page ID# 460–61; R. 15-6, Page ID# 508–509; R. 15-7.]

Respondent Jeremy Mattox (“Judge Mattox”) is a Scott County, Kentucky, Circuit Court Judge. Young’s claims against Judge Mattox arise from a single judicial act: on April 23, 2019, Judge Mattox entered an Order dismissing Young’s ballot challenge against then-Congressional candidate Amy McGrath as moot because

McGrath had lost her bid for Congress. [R. 19-2, Page ID# 716–18.] Young appealed Judge Mattox’s Order and the Kentucky Court of Appeals dismissed the appeal, [R. 19-4, Page ID# 723] and denied Young’s motion to transfer the case to Kentucky’s Supreme Court. [R. 19-3, Page ID# 719.]

Dissatisfied with this outcome, Young filed a complaint in the United States District Court for the Eastern District of Kentucky against Judge Mattox and the other respondents accusing them of participating in an election rigging conspiracy. [R. 14, *generally*]. Out of the 260 paragraphs in Young’s First Amended Complaint, his claims against Judge Mattox are contained in just four paragraphs. [R. 14, Page ID# 146–48.] Young alleges that Judge Mattox “joined the unlawful conspiracy to rig primary elections against me when he dismissed my 2018 ballot challenge against Amy McGrath without ever having had any lawful jurisdiction to hear the case at all.” [R. 14, Page ID# 146.] This is the entirety of Young’s factual allegation against Judge Mattox—a naked, conclusory assertion devoid of any factual support.

B. Procedural History

Young filed his original complaint against Governor Beshear on April 11, 2023. [R. 1.] On September 26, 2023, Young filed a 105-page, 46-count First Amended Complaint adding eight more defendants, including Judge Mattox. [R. 14, Page ID# 87.] The First Amended Complaint alleged 46 counts under 42 U.S.C. § 1983. Counts 1 through 41 alleged election-rigging conspiracies spanning from 2014 to 2022. [R. 14, Page ID# 87–176.] Counts 42 through 46 alleged similar conspiracies from 2022 to 2023. [R. 14, Page ID# 176–189.]

All defendants moved to dismiss. [R. 15; R. 19; R. 20; R. 23; R. 33; R. 38.] On August 28, 2024, the District Court (Judge Van Tatenhove) granted the motions to dismiss with prejudice. *Young v. Beshear*, No. 3:23-CV-00024-GFVT, 2024 WL 3969352, at *2–4 (E.D. Ky. Aug. 28, 2024). [R. 67.] Counts 1 through 41 were dismissed as time-barred under Kentucky’s one-year statute of limitations for § 1983 claims. *Id.* at *2. Counts 42 through 46 were dismissed for failure to state a claim, immunity, and other grounds. *Id.* at *3–4. The Court ordered Young to show cause why he should not be placed on pre-filing restrictions. *Id.* at *5.

On September 13, 2024, rather than responding to the show-cause order, Young filed a Motion to Vacate. [R. 68.] On May 8, 2025, the District Court denied the Motion to Vacate, imposed pre-filing restrictions on Young, and entered judgment. *Young v. Beshear*, No. 3:23-CV-00024-GFVT, 2025 WL 1348917, at *3 (E.D. Ky. May 8, 2025). [R. 69; R. 70.]

Young appealed to the Sixth Circuit (Case No. 25-5467). On December 22, 2025, a unanimous panel of the Sixth Circuit (Griffin, Murphy, and Ritz, Circuit Judges) affirmed the District Court’s judgment and granted motions for sanctions against Young. *Young v. Beshear*, No. 25-5467, 2025 WL 4733010 (6th Cir. Dec. 22, 2025) (order). The Sixth Circuit found:

The district court’s dismissal of his amended complaint was clearly correct, and his appellate arguments are groundless. Yet Young continues to litigate these same issues over and again without success.

Id. at *3. The Sixth Circuit further found that the appeal was “filed out of sheer obstinacy—when the only issues in the case clearly have been resolved against the appellant.” *Id.* (quoting *Anderson v. Dickson*, 715 F. App’x 481, 489 (6th Cir. 2017)). As a result of Young’s actions, the Court imposed monetary sanctions against him, noting: “This court does not take lightly the sanctioning of litigants, especially those who are pro se. But we have a duty to ensure that parties do not have to defend themselves in perpetuity simply because a litigant like [Young] refuses to take no for an answer.” *Id.* (quoting *Anderson*, 715 F. App’x at 490).

Steadfast in his obstinance, on January 5, 2026, Young filed a petition for rehearing en banc. Appellant’s Petition for Rehearing En Banc, *Young v. Beshear*, No. 25-5467 (6th Cir. Jan. 5, 2026), ECF No. 37. The Sixth Circuit denied Young’s Petition May 12, 2026. Order Denying Petition for Rehearing, *Young v. Beshear*, No. 25-5467 (6th Cir. May 12, 2026), ECF No. 42. .

Undeterred by years of adverse rulings and multiple sanctions, on July 8, 2026, Young filed the instant Petition for Writ of Certiorari.



REASONS FOR DENYING THE PETITION

I. The Questions Presented Do Not Warrant This Court’s Review.

This Court’s Rule 10 provides that a petition for writ of certiorari will be granted only for “compelling reasons.” None of the criteria under Rule 10 are present here. There is no conflict between circuits, no departure from accepted judicial practice, and no important federal question that has not already been settled by this Court.

Young’s first two questions ask this Court to overturn *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007), and *Ashcroft v. Iqbal*, 556 U.S. 662 (2009)—two landmark decisions that have been the settled law of pleading standards for nearly two decades. These decisions have been applied consistently by every federal circuit and reaffirmed by this Court on numerous occasions. Young offers no legitimate basis for overturning them. His disagreement with their application to his deficient complaint does not present a question warranting certiorari.

Young’s third and fourth questions—whether the District Court dismissed his complaint without applying “any standard of review at all” and whether the Sixth Circuit denied his appeal without reviewing his amended complaint *de novo*—are factually baseless. The District Court applied the well-established *Twombly/Iqbal* pleading standard. *Young*, 2024 WL 3969352, at *1–2. The Sixth Circuit reviewed the dismissal *de novo* and unanimously affirmed, explicitly finding that

“[t]he district court’s dismissal of his amended complaint was clearly correct.” *Young*, 2025 WL 4733010, at *3. These questions present nothing more than Young’s disagreement with the outcome—not a genuine legal issue meriting this Court’s review.

In short, the Questions Presented are not questions at all. They are rhetorical attacks on well-established precedent, dressed up as constitutional inquiries. This Court should decline review.

II. The Lower Courts Correctly Applied Well-Established Law to Dismiss Young’s Claims Against Judge Mattox.

With respect to Judge Mattox specifically, the claims fail on every conceivable ground. The lower courts did not err in dismissing them, and there is no basis for this Court’s review.

A. Young’s Claims Are Time-Barred.

Kentucky’s statute of limitations for personal injury actions—which applies to § 1983 claims—is one year. Ky. Rev. Stat. § 413.140(1)(a). *See also Million v. Raymer*, 139 S.W.3d 914, 919 (Ky. 2004) (holding one-year statute of limitations for personal injury applies to § 1983 claims). Judge Mattox’s sole alleged overt act was the dismissal of Young’s ballot challenge on April 23, 2019. [R. 14, Page ID# 146; R. 19-2, Page ID# 716.] Young did not file his claim against Judge Mattox until September 26, 2023—more than four years later. [R. 14, Page ID# 87.] Even measuring from the date the Kentucky Court of Appeals denied Young’s appeal (April 2, 2020) [R. 19-4, Page ID# 723], the statute of limitations expired on April 2, 2021, still more than two years *before* Young filed suit.

Young’s conclusory allegations of an ongoing conspiracy are insufficient to extend the limitations period. *See, Collyer v. Darling*, 98 F.3d 211, 220 (6th Cir. 1996) (statute of limitations not tolled for a § 1983 conspiracy claim where plaintiff made only conclusory allegations to support it.) *See also, Eidson v. State of Tennessee Dep’t of Children’s Servs.*, 510 F.3d 631, 634 (6th Cir. 2007); *Collard v. Kentucky Bd. of Nursing*, 896 F.2d 179, 181 (6th Cir. 1990). Young’s claim against Judge Mattox is time-barred by years, and no amount of conspiracy rhetoric can revive it.

B. Judge Mattox Is Entitled to Eleventh Amendment Immunity.

The Eleventh Amendment bars suits in federal court against state officials in their official capacity. Judge Mattox is a Kentucky Circuit Court Judge—a state official—and Young’s claims against him in his official capacity are barred. *See Kentucky v. Graham*, 473 U.S. 159, 169 (1985); *Hans v. Louisiana*, 134 U.S. 1, 17 (1890). Congress did not abrogate Eleventh Amendment immunity in enacting 42 U.S.C. § 1983. *See Quern v. Jordan*, 440 U.S. 332, 345 (1979). This is well-settled law that requires no further review by this Court.

C. Judge Mattox Is Entitled to Absolute Judicial Immunity.

It is also a longstanding principle that judges are absolutely immune from civil suits for actions taken in their judicial capacity. *See Mireles v. Waco*, 502 U.S. 9 (1991); *Forrester v. White*, 484 U.S. 219 (1988); *Stump v. Sparkman*, 435 U.S. 349, 355–56 (1978). As this Court has held, judges are protected “even when such acts are in excess of their jurisdiction, and are

alleged to have been done maliciously or corruptly.” *Stump*, 435 U.S. at 356 (citations omitted).

Judge Mattox’s dismissal of Young’s ballot challenge was unquestionably a judicial act. Ky. Rev. Stat. § 118.176(2) gave Judge Mattox jurisdiction to hear ballot challenges, and his resolution of such a challenge was a core judicial function. This immunity extends even to judges who allegedly conspired with others. *See Ashelman v. Pope*, 793 F.2d 1072, 1078 (9th Cir. 1986). Young’s claim is thus barred by absolute judicial immunity—a doctrine this Court has also consistently reaffirmed and that requires no reconsideration.

D. Young’s Claims Constitute an Impermissible Collateral Attack on a State Court Judgment.

Young’s claim against Judge Mattox is, at bottom, an attempt to use a § 1983 action to collaterally attack Judge Mattox’s state court judgment dismissing his ballot challenge. This is prohibited. *See District of Columbia Court of Appeals v. Feldman*, 460 U.S. 462, 486 (1983); *In re Sun Valley Foods Co.*, 801 F.2d 186, 189 (6th Cir. 1986). As this Court held in *Feldman*, federal district courts have “no authority to review final judgments of a state court in judicial proceedings.” 460 U.S. at 482. That is precisely what Young seeks to do here.

E. Young Failed to State a Claim.

Even setting aside all of the foregoing barriers, Young’s conspiracy allegation against Judge Mattox is limited to the conclusory assertion that Judge Mattox “joined the unlawful conspiracy to rig primary elections against me when he dismissed my 2018 ballot challenge against Amy McGrath without ever having had any

lawful jurisdiction to hear the case at all.” [R. 14, Page ID# 146.] This allegation is devoid of any facts supporting a conspiracy. It alleges no agreement, no communication between alleged co-conspirators, no motive, and no facts from which a conspiracy could be inferred.

Conspiracy claims under § 1983 must be pled with specificity; vague and conclusory allegations are insufficient. *See Gutierrez v. Lynch*, 826 F.2d 1534, 1538 (6th Cir. 1987); *Jaco v. Bloechle*, 739 F.2d 239, 245 (6th Cir. 1984). The Sixth Circuit properly found that Young had “‘not plausibly alleged’ a conspiracy—‘an agreement between two or more persons to injure [him] by unlawful action.’” *Young*, 2025 WL 4733010, at *2 (quoting *Susselman v. Washtenaw Cnty. Sheriff’s Off.*, 109 F.4th 864, 872 (6th Cir. 2024)). The lower courts did not err, and there is no basis for this Court’s review.

III. This Case Is a Particularly Poor Vehicle for Certiorari Review.

Even if this Court were inclined to revisit pleading standards—which it should not be—this case would be a particularly poor vehicle for doing so. Young’s claims against Judge Mattox fail on multiple independent grounds: the claims are time-barred, barred by Eleventh Amendment immunity, barred by absolute judicial immunity, constitute an impermissible collateral attack on a state court judgment, and fail to state a claim upon which relief can be granted. Any reconsideration of *Twombly* and *Iqbal* would be entirely academic in this case because Young’s claims would still be dismissed on all other grounds. A case with this many independent procedural and substantive defects is no vehicle for revisiting settled precedent.

IV. The Petition Is Frivolous and Part of a Pattern of Vexatious Litigation.

This Petition is merely the latest in a long line of frivolous filings by Young, who has shown a determined unwillingness to accept the consistent and repeated rejection of his claims by courts at every level.

Young has filed at least eleven similar lawsuits and forty related appeals, all of which have been dismissed. [R. 15-1; R. 15-2.] In 2017, the Eastern District of Kentucky warned Young about sanctions for filing baseless claims. *Young v. Overly*, No. 3:16-CV-00062-GFVT, 2017 WL 4355561, at *5 (E.D. Ky. Sept. 29, 2017), *aff'd*, No. 17-6242, 2018 WL 5311408 (6th Cir. July 2, 2018). The Kentucky Supreme Court sanctioned Young and required him to pay defendants' attorney's fees, finding:

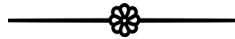
Young persists in repeating his unfounded and frivolous arguments which have been repeatedly and soundly rejected by courts at all levels. Young's continued resort to such unavailing arguments fails to advance his cause, results in waste of court resources, and wastes time and resources of the defendants who must respond to his vexatious actions.

[R. 15-4, Page ID# 460-61].

Both the Fayette Circuit Court and the Kentucky Court of Appeals have placed pre-filing restrictions on Young. [R. 15-6, Page ID# 509; R. 15-7, Page ID# 513.] The Eastern District of Kentucky imposed its own pre-filing restrictions. *Young*, 2025 WL 1348917, at *3. And the Sixth Circuit granted monetary sanctions against Young on appeal, finding that "none of Young's arguments here have arguable merit" and that the appeal

was “filed out of sheer obstinacy.” *Young*, 2025 WL 4733010, at *3 (quoting *Larry E. Parrish, P.C. v. Bennett*, 989 F.3d 452, 457–58 (6th Cir. 2021)); *see also Anderson*, 715 F. App’x at 490.

This Court should not reward Young’s persistent abuse of the judicial system by granting review of a petition that is, in every respect, frivolous. Granting certiorari would serve no purpose other than to validate Young’s strategy of endless, meritless litigation and to require respondents—including a sitting state court judge—to continue defending against baseless claims.



CONCLUSION

For the foregoing reasons, Respondent Honorable Jeremy Mattox respectfully requests that the Petition for Writ of Certiorari be denied.

Young’s claims against Judge Mattox are baseless on every possible ground. They are time-barred by years. They are barred by Eleventh Amendment immunity. They are barred by absolute judicial immunity. They constitute an impermissible collateral attack on a state court judgment. And they fail to state a claim because Young has alleged nothing more than a naked, conclusory assertion of conspiracy, devoid of any factual support.

The Questions Presented by Young do not satisfy any of the criteria for certiorari under Supreme Court Rule 10. There is no circuit split. The lower courts faithfully applied this Court's well-established precedent. This case is a particularly poor vehicle for any reconsideration of pleading standards given the multiple independent grounds for dismissal. And, the Petition is yet another installment in Young's well-documented pattern of vexatious litigation—a pattern that has been recognized and sanctioned by courts at every level.

Young's Petition should be denied.

Respectfully submitted,

/s/ Melissa Norman Bork

Melissa Norman Bork

Counsel of Record

Robert L. Whitmer

DENTONS BINGHAM GREENEBAUM LLP

3500 PNC Tower

101 South Fifth Street

Louisville, KY 40202

(502) 589-4200

melissa.normanbork@dentons.com

bobby.whitmer@dentons.com

Counsel for Respondent

Judge Jeremy Mattox

September 30, 2026