

Docket No. 26-262

SUPREME COURT OF THE UNITED STATES

GEOFFREY M. YOUNG, *Petitioner*

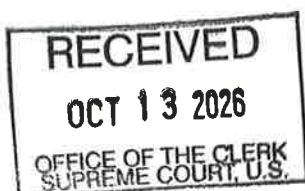
v.

ANDY BESHEAR, KENTUCKY DEMOCRATIC
PARTY, FAYETTE COUNTY DEMOCRATIC
PARTY, ANDY BARR, REPUBLICAN PARTY OF
KENTUCKY, REPUBLICAN PARTY OF FAYETTE
COUNTY, REPUBLICAN PARTY OF CLARK
COUNTY, KENTUCKY EDUCATIONAL
TELEVISION, and JEREMY MATTOX,
Respondents

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

**PETITIONER'S REPLY BRIEF TO JEREMY
MATTOX'S BRIEF IN OPPOSITION**

Petitioner: Geoffrey M. Young, *pro se*
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QUESTIONS PRESENTED FOR REVIEW

1. Should this Court reverse its majority decision in *Bell Atl. Corp. v. Twombly*, 550 US 544, (2007) and declare that it is bad law?
2. Should this Court reverse its majority decision in *Ashcroft v. Iqbal*, 556 U.S. 662 (2009) and declare that it is bad law?
3. May the U.S. District Court for the Eastern District of Kentucky dismiss a well-pleaded complaint, before discovery, for failure to state a claim without correctly applying any standard of review at all?
4. May the Sixth Circuit Court of Appeals deny an appellant's appeal and impose more sanctions against him without ever reviewing his latest amended complaint *de novo*?

Parties to the Proceeding

Petitioner: Geoffrey M. Young

Respondent who submitted the brief in opposition:
Jeremy Mattox

Other Respondents:
Andy Beshear
Kentucky Democratic Party
Fayette County Democratic Party
Andy Barr
Republican Party of Kentucky
Republican Party of Fayette County
Republican Party of Clark County
Kentucky Educational Television

Corporate Disclosure Statement
I, Geoffrey M. Young, am an individual.

List of Proceedings

Geoffrey M. Young v. Andy Beshear, et al., No. 3:23-cv-00024, U.S. District Court for the Eastern District of Kentucky. Latest of three final and appealable judgments, entered on May 8, 2025.

Geoffrey M. Young v. Andy Beshear, et al., No. 25-5467, U.S. Court of Appeals for the Sixth Circuit. Latest of three final and appealable judgments, entered on May 12, 2026. See Appendix to the petition.

**REASONS TO DISREGARD JEREMY
MATTOX'S BRIEF IN OPPOSITION**

Rule 15 states, in pertinent part, that "the brief in opposition should address any perceived misstatement of fact or law in the petition that bears on what issues properly would be before the Court if certiorari were granted." I reviewed Jeremy Mattox's brief carefully and did not find any sentences or clauses that identified any alleged misstatement of fact or law in my petition for certiorari.

I did, however, find several misstatements of fact and/or law in his brief in opposition.

1. Judge Mattox wrote, by counsel:

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. Brief in Opposition at 1-2.

What I actually wrote in my petition for certiorari, however, was the following:

Scott County Circuit Judge Jeremy Mattox [Defendant I] 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. Young's Petition for cert. at 29.

The act that led me to sue Mattox for damages was not his totally unjust dismissal order of April 23, 2019 but his unlawful seizure of subject matter jurisdiction over a ballot challenge that KRS 118.176 explicitly prohibited him from deciding. *Id.* at 29-30.

2. Mattox, by counsel, wrote, "This is the entirety of Young's factual allegation against Judge Mattox—a naked, conclusory assertion devoid of any factual support." Brief at 2.

However, the long paragraph on page 30 of my

petition for certiorari included six allegations that supported my central allegation that in 2018, Judge Mattox joined the unlawful conspiracy to rig primary elections against me when he illegally seized jurisdiction over a case which the governing state statute explicitly prohibited him from deciding. To label that central allegation "naked," "conclusory," and "devoid of any factual support" was and is a lie.

I also referred to this Court's decision in *Bradley v. Fisher*, 80 U.S. 335 (1871). That decision instructed as follows:

[J]udges of courts of superior or general jurisdiction are not liable to civil actions for their judicial acts, even when such acts are in excess of their jurisdiction, and are alleged to have been done maliciously or corruptly. A distinction must be here observed between excess of jurisdiction and the clear absence of all jurisdiction over the subject matter. Where there is clearly no jurisdiction over the subject matter any authority

exercised is a usurped authority, and for the exercise of such authority, when the want of jurisdiction is known to the judge, no excuse is permissible. *Bradley v. Fisher* at 351-352.

Before appealing this case to the Sixth Circuit Court of Appeals, I alleged that Judge Mattox knew or should have known that he never had subject matter jurisdiction to try my 2018 ballot challenge against Amy McGrath because of the unambiguous wording of the following duly-enacted state statute:

If the Circuit Judge of the circuit in which the proceeding is filed is disqualified or absent from the county or is herself or himself a candidate, the proceeding may be presented to, heard and determined by the Circuit Judge of any adjoining judicial circuit. KRS 118.176(2).

I also alleged that Judge Mattox was a candidate for office -- the office of Kentucky circuit court judge -- in 2018 at the time I filed my ballot

challenge against Amy McGrath.

Subsequent opinions by this Court, including *Stump v. Sparkman*, 435 U.S. 349 (1978) and *Will v. Michigan Department of State Police*, 491 U.S. 58 (1989), reinforced the central finding of law in *Bradley v. Fisher*: that judicial immunity is absolute for acts within a judge's jurisdiction, but that no immunity exists when the judge never had subject matter jurisdiction to try the case.

3. Judge Mattox, by counsel, wrote:

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. Brief at 5.

My petition, however, included many

arguments to the effect that the Sixth Circuit Court of Appeals entered three unjust, vicious, final and appealable orders that obviously departed from the accepted and usual course of judicial proceedings, and unjustly upheld three other obviously unjust, vicious, final and appealable dismissal and sanctioning orders entered by the district court. All six of the orders in the appendix call out for the exercise of this Court's supervisory power.

I should mention that Gregory F. Van Tatenhove is no longer a judge. On July 19, 2026, he retired from his position as a federal district judge in order to become the Dean of the University of Kentucky Rosenberg College of Law.

4. Jeremy Mattox called *Twombly* and *Iqbal* "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." Brief in Opposition at 5.

However, legal scholars have criticized

Twombly and *Iqbal* ever since they were decided.

Their central criticism is that this Court replaced notice pleading with a stricter plausibility standard. In my opinion, the dissents in both cases were much stronger, more persuasive, and better-reasoned than the two majority opinions.

Empirical studies have shown that civil rights complaints have been dismissed before discovery at higher rates since *Twombly* and *Iqbal* were decided. All of my election-related complaints have been civil rights complaints.

Every defendant I have sued between 2014 and today has filed, by counsel, a motion to dismiss for failure to state a claim upon which relief can be granted, and every trial court has applied the "Van Tatenhove standard of review" and thrown all of my civil rights complaints out of court before discovery. I described the Van Tatenhove standard of review:

"Trial courts in the Sixth Circuit may dismiss any complaint before the discovery stage, with prejudice, any time they want to. In addition, the court may lie about what the plaintiff alleged and did not allege in his or her complaint." Young's Petition at 7-8.

The Van Tatenhove standard of review, which is not a standard of review at all, allowed hundreds of federal and state courts to become far more hostile to all plaintiffs than the *Twombly* decision did. *Twombly* opened the door of America's justice system to the enemies of all plaintiffs, *Iqbal* drove a

tank through the doorway, and hundreds of federal and state trial and appellate courts after 2007 turned the entire neighborhood into rubble with 2,000-pound bombs. This massive, ongoing miscarriage of justice can be partly corrected by reversing the *Iqbal* and *Twombly* opinions in their entirety and finding that both opinions are bad law.

WHEREFORE, I respectfully request that this Court grant my petition for certiorari, report to the American people how all nine Justices voted re the certiorari decision, and allow both sides to present briefs on the four questions presented for review.

Respectfully signed on October 7, 2026 by:



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