

NO.

26-5415

ORIGINAL

IN The

Supreme Court OF The UNITED States

Supreme Court, U.S.
FILED

JUL 16 2026

OFFICE OF THE CLERK

IN RE Willie C. Simpson - Petitioner

ON Petition For A writ OF MANDAMUS

TO: The UNITED States District Court Western District OF WISCONSIN

Petition For writ OF MANDAMUS

Willie C. Simpson

Name

WISCONSIN secure program Facility
P.O. Box 1000

Address

Boscobel WI. 53805

City, State, Zip code

?

Phone

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Supreme court of The United States

[Question Presented]

1. must The U.S. Supreme Court issue writ of mandamus to compel A jury trial for petitioner 42 USC. 1983 Law suit to allow A jury to determine the issue of petitioner liability for civil penalties in the amount of 1,000 dollars and 1,500 dollars in the context of petitioner legal claim for 25,000,000 million dollars punitive damages, necessary and appropriate in aid of its jurisdiction, as promised in Beacon Theatres Inc. v. Westover 359 U.S. 500 (1959)
2. Does petitioner have a U.S. Constitutional 7th. Amend right to a jury trial for his 42 USC. 1983 Law suit to allow a jury to determine the issue of petitioner liability for civil penalties in the amount of 1,000 dollars and 1,500 dollars in the context of petitioner legal claim for 25,000,000 million dollars punitive damages under the U.S. Supreme Court decision in Tull v. U.S. 481 U.S. 412 (1987) and Securities and Exchange Commission v. Jarkesy 603 U.S. 109 (2024) and Curtis v. Loether 415 U.S. 189 (1974)

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Supreme Court of The United States

[List of parties]

1. petitioner Willie C. Simpson is a citizen of The United States, prisoner of The State of Wisconsin, Department of Corrections, Located at Wisconsin Secure Program Facility, P.O. Box 1000, Boscobel, WI. 53805.

2. Respondent, United States District Court Westover District of Wisconsin, 120 North Henry Street, room 320, Madison, WI. 53703; Hon. Judge James D. Peterson and Clerk of Court Joel Turner

[Related cases]

This petition for writ of mandamus relates to the U.S. Supreme Court promise to the right to issuance of writ of mandamus to require a jury trial where it has been improperly denied in the decision, Beacon Theatres Inc. v. Westover 359 U.S. 500, 501-511 (1959). The U.S. Supreme Court held that because maintenance of the jury as a fact-finding body is of such importance and occupies so firm a place in our history and jurisprudence that any seeming curtailment of the right to a jury trial should be scrutinized with the utmost care, and a litigant is entitled to a writ of mandamus to require jury trial where it has been improperly denied. The U.S. Supreme Court in Beacon Theatres Inc. v. Westover 359 U.S. at 511 said the long-standing principle of equity dictates that only under the most imperative circumstances, circumstances which in view of the flexible procedures of the Federal rules, we cannot now anticipate can the right to a jury trial of legal issues be lost through prior determination of equitable claims, also Lytle v. Household Mfg. Inc. 494 U.S. 545, 550 (1990)

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[Related cases continued]

IN Tull v. U.S. 481 U.S. 412, 416 - 427 (1987), The U.S. Supreme Court hold That The 7th. Amend. entitled The petitioner TO A JURY TRIAL ON civil penalties claims Because A civil penalty WAS The Type OF remedy AT common LAW That could only Be enforced in courts OF LAW, IN Tull v. U.S. 481 U.S. AT 425, The U.S. Supreme Court hold That in The CASE OF intertwinement, IF A legal claim is joined with AN equitable claim The right TO JURY TRIAL ON The legal claim including All issues common TO Both claims remain intact, The right cannot Be abridged By characterizing The legal claim AS incidental TO The equitable relief sought ... Thus petitioner HAS A constitutional right TO JURY TRIAL TO determine his liability ON The legal claims IN Lytle v. Household MFG. INC. 494 U.S. 545, 555 (1990), The Supreme Court hold That The District courts Factual determination OF issues common TO Both equitable AND legal claims where The court resolved The equitable claims first is not precluded From relitigation Before A JURY IN The context OF The petitioner legal claims By collateral estoppel or res judicata Bar effect, To hold otherwise would seriously undermine A plaintiff's right TO A JURY TRIAL UNDER The seventh Amendment; IN Securities and Exchange Commission v. Jarkesy 603 U.S. 109, 128 (2024), The U.S. Supreme Court hold That, IF A suit is IN The nature OF AN ACTION AT common LAW Then The matter presumptively concerns private rights AND ADJUDICATION By AN Article 3 court is mandatory, IN Stern v. Marshall 564 U.S. 412, 484 (2011) The U.S. Supreme Court hold That when A suit is made OF The stuff OF The traditional actions AT common law Tried By The courts AT Westminster IN 1789 AND is Brought within The BOUNDS OF Federal Jurisdiction, The responsibility For Deciding That suit rest with Article 3 Judges in Article 3 courts.

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[Related cases continued]

in petitioner case The U.S. District court usurped jurisdiction
committed By The U.S. Constitution AND Federal statute, Article 3
Sec 2, Title 28 USC.1331 AND The JUDICIAL ACT OF 1789 Sec. 11, (1 Stat. 78)
refusing to Adjudicate petitioner 42 USC.1983 civil Law suit DEMAND
For A JURY TRIAL For A JURY TO Determine The issue of liability for
civil penalties in The amount of 1,000 Dollars AND 1,500 Dollars in The
context of petitioner LEGAL claim For 25,000,000 million Dollars
punitive DAMAGES, AND BARRING Appellate review of The order
Dismissing The case, LOOK AT APPENDIX C

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[TABLE OF AUTHORITIES CITED]

[CASES]

BEACON THEATRES INC. v. WESTOVER, 359 U.S. 500 (1959)
SECURITIES AND EXCHANGE COMMISSION v. JARKESY, 603 U.S. 109 (2024)
LYTLE v. HOUSEHOLD MFG. INC. 494 U.S. 545 (1990)
STERN v. MARSHALL 564 U.S. 412 (2011)
CHANDLER v. JUDICIAL COUNSEL OF TENTH CIR. OF U.S. 398 U.S. 74 (1970)
LAWRENCE ON BEHALF OF LAWRENCE v. CHATER 516 U.S. 163 (1996)
STUTSON v. U.S. 516 U.S. 193 (1996)
CURTIS v. LOETHER 415 U.S. 189 (1974)
GRAN FINANCIERA SA. v. NORBERG 492 U.S. 33 (1989)
PERTTU v. RICHARDS 605 U.S. 460 (2025)
MONTEREY v. DEL MONTE DUNES 526 U.S. 687 (1999)
ARBAUGH v. Y+H CORP 546 U.S. 500 (2006)
TRUMP v. CSA, INC. 606 U.S. 831 (2025)
SANTOS-ZACARIA v. GARLAND 598 U.S. 411 (2023)
PORTER v. WARNER HOLDING CO. 328 U.S. 395 (1946)

[STATUTES AND RULES]

TITLE 28 USC. 1651(A)
TITLE 28 USC. 2106

[OTHER]

U.S. CONSTITUTION 14th AMEND.
U.S. CONSTITUTION ARTICLE 3 sec 2

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IN The

Supreme Court of The United States

Petition For writ of Mandamus

Petitioner respectfully prays That a writ of Mandamus issue

[OPINIONS Below]

For Cases From Federal Courts:

The opinion of The United States Court of Appeals
Appears at Appendix D-E To The petition,
not reported, nor Designated For publication and
is not being challenged

The opinion of The United States District Court
Appears at Appendix A-C To The petition
not reported, nor Designated For publication, unpublish-
ed and writ of Mandamus is sought to
challenge:

For Cases From state courts:

The petition does not seek review of state court
decisions

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[JURISDICTION]

The United States Supreme Court Appellate Jurisdiction is invoked pursuant to Title 28 USC. 1651(A) AND Article 3 sec. 2 U.S. CONST. The All Writs Act Title 28 USC. 1651(A) provides that The Supreme Court AND all courts established by Act of Congress may issue all writs necessary to the usages AND principles of law. The authority of The U.S. Supreme Court to issue a writ of MANDAMUS can be constitutionally exercised insofar as the writ is in aid of its appellate jurisdiction. According to the decision CHANDLER V. JUDICIAL COUNSEL OF TENTH CIR. OF U.S. 398 U.S. 74, 86 (1970), The U.S. Supreme Court holds, with respect to U.S. Supreme Court jurisdiction, The U.S. Supreme Court will not take jurisdiction if it should not, but it must take jurisdiction if it should with whatever doubts, with whatever difficulties a case may be attended. The U.S. Supreme Court must decide it, if it be brought before The U.S. Supreme Court. The U.S. Supreme Court have no more right to decline the exercise of jurisdiction which is given than to usurp that which is not given. In the decision CHANDLER V. JUDICIAL COUNSEL OF TENTH CIR. U.S. 398 U.S. at 94. The U.S. Supreme Court considers jury trial so important that the court promised a right to issuance of writ of MANDAMUS to grant jury trial at common law where it has been improperly denied in BEACON THEATRES INC V. WESTOVER 359 U.S. at 511. This case does not seek appellate review of the decision of the state court, nor seek appellate review of the U.S. Court of Appeals decision, rather this writ of MANDAMUS is a challenge to the U.S. District Court order dismissing the petitioner case, refusing to adjudicate the case properly before it, when it is its duty to do so, obstructing appellate review by barring appellate review of the order secured to the U.S. Supreme Court under Title 28 USC. 2106 AND Article 3 sec. 2 to vacate the U.S.

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[Jurisdiction continued]

District Court judgment and order and to require a jury trial or any other relief the U.S. Supreme Court deems necessary, according to the U.S. Supreme Court decision, Lawrence on Behalf of Lawrence v. Chater 516 U.S. 163, 166 (1996) and Stutson v. US 516 U.S. 193, 196-197 (1996).

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[CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED]

The constitutional and statutory provisions involved in this writ of mandamus include, The U.S. Constitution 7th. Amendment, Title 28 USC 2106 Determination Jurisdiction, Title 28 USC 1651(A) AND U.S. Constitution Article 3 sec. 2, in Relevant part These constitutional and statutory provisions read:

[UNITED STATES CONSTITUTION 7th. AMEND. CIVIL TRIALS]

IN SUITS AT COMMON LAW, WHERE THE VALUE IN CONTROVERSY SHALL EXCEED TWENTY DOLLARS, THE RIGHT OF TRIAL BY JURY SHALL BE PRESERVED, AND NO FACT TRIED BY A JURY SHALL BE OTHERWISE RE-EXAMINED IN ANY COURT OF THE UNITED STATES, THAN ACCORDING TO THE RULES OF THE COMMON LAW;

[UNITED STATES CONSTITUTION ARTICLE 3 SEC. 2 CL. 2]

IN ALL CASES AFFECTING AMBASSADORS, OTHER PUBLIC MINISTERS AND CONSULS AND THOSE IN WHICH A STATE SHALL BE A PARTY, THE SUPREME COURT SHALL HAVE ORIGINAL JURISDICTION, IN ALL OTHER CASES BEFORE MENTIONED, THE SUPREME COURT SHALL HAVE APPELLATE JURISDICTION BOTH AS TO LAW AND FACT, WITH SUCH EXCEPTIONS AND UNDER SUCH REGULATIONS AS THE CONGRESS SHALL MAKE;

[TITLE 28 USC 1651(A) ALL WRITS ACT]

THE SUPREME COURT AND ALL COURTS ESTABLISHED BY ACT OF CONGRESS MAY ISSUE ALL WRITS NECESSARY OR APPROPRIATE IN AID OF THEIR PROSPECTIVE JURISDICTION AND AGREEABLE TO THE USAGE AND PRINCIPLES OF LAW;

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[CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED]
CONTINUED

[TITLE 28 U.S.C. 2106 DETERMINATION]
JURISDICTION

The Supreme Court or ANY COURT OF APPELLATE JURISDICTION MAY AFFIRM, MODIFY, VACATE, SET ASIDE or REVERSE ANY JUDGMENT, DECREE or ORDER OF A COURT LAWFULLY BROUGHT BEFORE IT FOR REVIEW AND MAY REMAND THE CAUSE AND DIRECT THE ENTRY OF SUCH APPROPRIATE JUDGMENT DECREE or ORDER, or REQUIRE SUCH FURTHER PROCEEDINGS TO BE HAD AS MAY BE JUST UNDER THE CIRCUMSTANCES:

The U.S. Supreme Court HAS INTERPRETED THE 7TH. AMEND. JURY TRIAL GUARANTEE AND WRIT OF MANDAMUS IN BEACON THEATRES INC. v. WESTOVER 359 U.S. AT 501-511 HOLDING THAT BECAUSE MAINTENANCE OF THE JURY AS A FACT-FINDING BODY IS OF SUCH IMPORTANCE AND OCCUPIES SO FIRM A PLACE IN OUR HISTORY AND JURISPRUDENCE THAT ANY SEEMING CURTAILMENT OF THE RIGHT TO JURY TRIAL SHOULD BE SCRUTINIZED WITH THE UTMOST CARE; A LITIGANT IS ENTITLED TO A WRIT OF MANDAMUS TO REQUIRE JURY TRIAL WHERE IT HAS BEEN IMPROPERLY DENIED; THE U.S. SUPREME COURT PROMISES THE RIGHT TO WRIT OF MANDAMUS ISSUANCE TO GRANT JURY TRIAL WHERE IT HAS BEEN IMPROPERLY DENIED, IN BEACON THEATRES INC. v. WESTOVER 359 U.S. AT 511. IN PETITIONER CASE THE DISTRICT COURT REFUSED TO ADJUDICATE PETITIONER 42 U.S.C. 1983 CIVIL LAW SUIT DEMAND FOR A JURY TRIAL FOR A JURY TO DETERMINE THE ISSUE OF LIABILITY FOR CIVIL PENALTIES IN THE AMOUNT OF 1,000 DOLLARS AND 1,500 DOLLARS, IN THE CONTEXT OF PETITIONER LEGAL CLAIM FOR 25,000,000 MILLION DOLLARS PUNITIVE DAMAGES, AND BARRED APPELLATE REVIEW OF THE ORDER DISMISSING THE CASE

[Statement of The Case]

This case is almost indistinguishable from the Tull v. US 481 U.S. 412, 418, 425 (1987) case which the US Supreme Court holds that, A civil penalty suit is a particular type of an action in debt requiring a jury trial, IF A legal claim is joined with an equitable claim, the right to jury trial on the legal claim including all issues common to both claims, remain intact, the right cannot be abridged by characterizing the legal claim as incidental to equitable relief sought, Thus petitioner has a constitutional right to jury trial to determine his liability on the legal claims, AND the Lytle v. Household Mfg Inc 494 U.S. 545, 550, 555 (1990) case which the US Supreme Court holds that, only under the most imperative circumstances, circumstances which in view of the flexible procedures of the Federal rules we cannot now anticipate can the right to a jury trial of legal issues be lost through prior determination of equitable claims, A district court's prior determination of issues common to equitable and legal claims is not precluded from relitigation by the doctrine of collateral estoppel or res judicata bar effect before a jury in the context of legal claims;

IN FEB. 2026 petitioner filed a 42 USC 1983 civil rights law suit demanding a jury trial raising equitable claim for relief on any the grounds: (1) Defendants falsely imprison petitioner without any valid conviction for violation of a valid criminal statute in violation of the US Const 4th Amend; AND A legal claim for relief; (2), 25,000,000 million dollars punitive damages for defendants deliberately and maliciously disregarding the rights and privileges secured to plaintiff by the US Const. 4th Amend. to protection against unreasonable seizure; IN THE CASE SIMPSON v. WISCONSIN DEPARTMENT OF CORRECTIONS NO. 26-CV-00025.

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[Statement of The Case Continued]

U.S. District Court Western District of Wisconsin, in 2021 and 2023 prior to filing case 26-cv-00025, The U.S. 7th Cir. Court of Appeals sanctioned petitioner to pay 1,000 dollars for filing frivolous appeal barring petitioner from filing any papers with the exception to Habeas Corpus or Criminal Cases, until the fee is paid in full in 2021 in the case Simpson v. Litscher No. 20-3293 (7th Cir. March 19, 2021) Look at Appendix D, and sanctioned petitioner to pay 1,500 dollars for filing frivolous Habeas Corpus, barring petitioner from filing any collateral attack on petitioner Wisconsin criminal convictions or sentences until the fee is paid in full in 2023 in the case Simpson v. Boughton No. 23-2638 (7th Cir. Sept. 18, 2023) Look at Appendix E. The 1,000 dollar and 1,500 dollar civil penalty is an issue common to both petitioner equitable and legal claims for raised in petitioner 42 USC. 1983 civil suit equitable action at law in the case 26-cv-00025, and joined cases 25-cv-994, case 26-cv-00044, and case 26-cv-00255 civil actions under 42 USC. 1983 filed by petitioner in the District Court Western District of Wisconsin and dismissed all cases, Look at Appendix A contrary to the U.S. Supreme Court Decision Tull v. US 481 U.S. at 418, 425 Holding That, a civil penalty suit is a particular type of an action in debt requiring a jury trial, if a legal claim is joined with an equitable claim, the right to jury on the legal claim including all issues common to both claims remain intact, the right cannot be abridged by characterizing the legal claim as incidental to equitable relief sought, Thus, petitioner has a constitutional right to jury trial to determine his liability in the context of his legal claims for 25,000,000 million dollars punitive damages

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[statement of The case continued]

AND ACCORDING TO THE DECISION LYTLE V. HOUSEHOLD MFG. INC. 494 U.S. AT 550, 555 HOLDING THAT ONLY UNDER THE MOST IMPERATIVE CIRCUMSTANCES, CIRCUMSTANCES WHICH IN VIEW OF THE FLEXIBLE PROCEDURES OF THE FEDERAL RULES WE CANNOT NOW ANTICIPATE CAN THE RIGHT TO A JURY TRIAL OF THE LEGAL ISSUES BE LOST THROUGH PRIOR DETERMINATION OF EQUITABLE CLAIMS, A DISTRICT COURT'S PRIOR DETERMINATION OF ISSUES COMMON TO EQUITABLE AND LEGAL CLAIMS IS NOT PRECLUDED FROM RELITIGATION BY THE DOCTRINE OF COLLATERAL ESTOPPEL OR RES JUDICATA BAR EFFECT BEFORE A JURY, IN THE CONTEXT OF LEGAL CLAIMS. PETITIONER FILED AN APPEAL OF THE DISTRICT COURT ORDER DISMISSING THE CASE 26-CV-00025, CASE 25-CV-000994, CASE 26-CV-00044 AND CASE 26-CV-000255 AND THE U.S. DISTRICT COURT DETERMINED THAT THE 1,000 DOLLAR AND 1,500 DOLLAR CIVIL PENALTY BAR, BAR PETITIONER APPEAL, USURPING FEDERAL JURISDICTION TO REVIEW THE ORDER DISMISSING THE CASES ON APRIL 23, 2026 LOOK AT APPENDIX C. THE U.S. DISTRICT COURT FACTUAL DETERMINATION OF THE ISSUE OF CIVIL PENALTY DEBT FOR 1,000 AND 1,500 DOLLARS IS A ISSUE LEFT UP TO A JURY TO DECIDE IN THE CONTEXT OF PETITIONER LEGAL CLAIMS FOR 25,000,000 MILLION DOLLARS PUNITIVE DAMAGES ACCORDING TO THE DECISION TULL V. U.S. 481 U.S. AT 418, COLLATERAL ESTOPPEL OR RES JUDICATA BAR EFFECT DOES NOT BAR THE 7TH AMEND. RIGHT TO JURY TRIAL TO RELITIGATE THE COURT PRIOR 2021 AND 2023 ISSUE OF CIVIL PENALTIES DEBT IN THE AMOUNT OF 1,000 DOLLARS AND 1,500 DOLLARS, IN THE CONTEXT OF PETITIONER LEGAL CLAIMS OF 25,000,000 MILLION DOLLARS PUNITIVE DAMAGES ACCORDING TO THE DECISION BEACON THEATRES INC. V. WESTOVER 359 U.S. AT 511 AND LYTLE V. HOUSEHOLD MFG INC 494 U.S. AT 555

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[statement of The case continued]

CONSIDERING, The 1,000 Dollar AND 1,500 Dollar civil penalty is A legal remedy which petitioner is entitled to jury trial for A jury to decide according to The U.S. Supreme Court Decision in Tull v. U.S. 481 U.S. at 418-419 AND petitioner 25,000,000 million Dollar punitive Damage claim is legal relief which petitioner is entitled to A jury trial for A jury to decide according to The Decision Curtis v. Loether 415 U.S. 189, 196 (1974). IN March 2026 petitioner Filed A motion for reconsideration to Alter AND Amend The U.S. District Court Bar on petitioner 42 USC. 1983 legal Action from presenting to A jury The 1,000 Dollar AND 1,500 civil penalty issue for A jury to decide in The context of petitioner legal claim of 25,000,000 million Dollars punitive Damages in The Face of The U.S. Supreme Court Decision in Tull v. U.S. 481 U.S. at 417-418, 425, Beacon Theatres Inc. v. Westover 359 U.S. at 511 AND Lytle v. Household Mfg. Inc. 494 U.S. at 555, However, The District Court Denied The motion in contravention of The U.S. Supreme Court Decisions, ON March 27, 2026 LOOK AT APPENDIX C

[Reason For granting The petition]

1. Petitioner HAS A CLEAR AND UNDISPUTABLE right TO ISSUANCE OF writ of mandamus TO require A jury TRIAL For Jury TO determine liability For The civil penalty IN The context of petitioners LEGAL claim For 25,000,000 million Dollars punitive DAMAGES promised By The U.S. Supreme court DECISION, BEACON Theatres INC. v. Westover 359 U.S. 500 (1959).

The U.S. Supreme court has promised The right TO ISSUANCE OF writ of mandamus TO require jury TRIAL where it has BEEN improperly DENIED IN BEACON Theatres INC. v. Westover 359 U.S. AT 511. Both The majority OF The court AND Desent Agree THAT ISSUANCE OF writ of mandamus IS A right where The right TO jury TRIAL has BEEN improperly DENIED, IN Tull v. U.S. 481 U.S. AT 417, 418, 425. The U.S. Supreme court Hold THAT The seventh Amendment guarantee The right TO A jury TRIAL For A jury TO determine liability For civil penalties IN The context OF A legal claim. The U.S. Supreme court has construed The 7th. Amend TO require A jury TRIAL ON The merits IN Those ACTIONS THAT ARE ANALOGOUS TO suits AT common LAW AND The ANALYSIS Applies NOT ONLY TO common - LAW FORMS OF ACTION BUT ALSO TO CAUSES OF ACTION created By congressional enactment, QUOTING The DECISION Tull v. U.S. 481 U.S. AT 417. The U.S. Supreme court ANALYSIS determining whether The 7th. Amend. Applies TO ACTIONS Brought TO statutory rights THAT ARE ANALOGOUS TO common LAW CAUSES OF ACTIONS ARE: (1) The U.S. Supreme court compare The statutory ACTION TO 18th.

[Reason For granting The petition continued]

Century Actions Brought in The Courts OF England prior TO The merger OF The Courts OF Law AND Equity (2) examine The remedy sought AND determine whether it is legal or equitable in nature; According TO The Decision Granfinanciera SA, v. Nordberg 492 U.S. 33, 42 (1989), A 42 USC. 1983 suit seeking legal relief is an action at law within The meaning OF The seventh Amendment AND That a predominantly factual question in such an action is for The jury According TO The Decision Perttu v. Richards 605 U.S. 460, 467 (2025) AND Monterey v. Del Monte Dunes At Monterey Ltd 526 U.S. 687, 709, 720-721 (1999). Thus, The U.S. Const. 7th. Amend. guarantee petitioner a right TO jury trial on His 42 USC. 1983 law suit legal claim for 25,000,000 million dollars punitive damages because punitive damages are a legal relief According TO The U.S. Supreme Court Decision Curtis v. Loether 415 U.S. 189, 196 (1974), prior TO The enactment OF The seventh Amendment English courts had held That a civil penalty suit was a particular species OF an action in debt That was within The jurisdiction OF The courts OF Law; Quoting Decision Tull v. U.S. 481 U.S. At 418, After The Adoption OF The seventh Amendment, Federal courts followed This English common law in treating The civil penalty suit as a particular type OF an action in debt requiring jury trial, Quoting Decision Tull v. U.S. 481 U.S. At 418, in Tull v. U.S. 481 U.S. At 425 The U.S. Supreme Court hold That in The case OF intertwinement, if a legal claim is joined with an equitable claim The right TO jury trial on The legal claim including all issues common TO Both claims remain intact, The right cannot be abridged By characterizing The legal as incidental TO The equitable relief sought, Thus petitioner has a constitutional

[Reason For granting The petition continued]

right to jury trial to determine his liability on the legal claims, in Lytle v. Household Mfg. Inc. 494 U.S. at 555, the U.S. Supreme Court held that the district court's factual determination of issues common to both equitable and legal claims where the court resolved the equitable claims first is not precluded from relitigation before a jury in the context of petitioner's legal claims by collateral estoppel or res judicata bar effect, to hold otherwise would seriously undermine a plaintiff's right to a jury trial, and in Beacon Theatres Inc. v. Westover 359 U.S. at 511, the U.S. Supreme Court held that the long-standing principle of equity dictates that the only long - under the most imperative circumstances, circumstances which in view of the flexible procedures of the Federal rules, we cannot now anticipate can the right to a jury trial of legal issues be lost through prior determination of equitable claims. The prior 2021 and 2023 civil penalty debt in the amount of 1,000 dollars and 1,500 dollars is an issue for the jury to decide according to the decision in Tull v. U.S. 481 U.S. at 418, the prior 2021 and 2023 civil penalties debt in the amount of 1,000 dollars and 1,500 dollars is a issue common to both petitioner 42 U.S.C. 1983 law suit equitable and legal claims and may not have collateral estoppel or res judicata bar effect to preclude relitigation of the issue before a jury in the context of petitioner's legal claim of 25,000,000 million dollars, put another way, collateral estoppel or res judicata bar effect does not bar the right to jury trial for a jury to determine the issue of liability for 1,000 dollars and 1,500 dollars imposed in 2021 and 2023 in the context of petitioner's legal claims of 25,000,000 million dollars punitive damages according to the decisions

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[- Reason for granting The petition continued]

BEACON Theatres INC. v. Westover 359 U.S. 511 AND Lytle v. Household Mfg. Inc. v. Westover ~~494~~ U.S. At 585, Therefore petitioner has a clear and undisputable constitutional right under The 7th. Amend. to jury trial to determine the issue of liability for the 1,000 dollar and 1,500 dollar civil penalty debt in the context of petitioner legal claim for 25,000,000 million dollar punitive damages. According to the decision Pull v. US. 481 U.S. At 418 Petitioner U.S. Const. 7th. Amend. right to jury trial has been improperly denied by the U.S. District court Therefore the Supreme court should issue writ of mandamus to require a jury trial for jury to determine the issue of petitioner liability in the context of petitioner legal claim for 25,000,000 million dollars punitive damages, necessary and appropriate in aid of the U.S. Supreme court appellate jurisdiction pursuant to Article 3 sec. 2 AND Title 28 USC. 2106 AND The All Writs Act Title 28 USC. 1651(A) which the U.S. Supreme court has promised the right to issuance of writ of mandamus to require jury trial where it has been improperly denied. in BEACON Theatres INC. v. Westover 359 U.S. At 511.

2. petitioner has no other adequate means to obtain a jury trial, relief sought by writ of mandamus due to the U.S. District court jurisdictional bar on petitioner 42 USC. 1983 lawsuit and bar on Federal Appellate review

The U.S. Supreme court has promised the right to issuance of writ of mandamus to require jury trial where it has been improperly denied in BEACON Theatres INC. v. Westover 359 U.S. At 511

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[Reason For Granting The Petition continued]

Both The majority of The court AND The Dissent Agree That Issuance of Writ of Mandamus is a right where Jury Trial has Been improperly Denied. In Beacon Theatres Inc. v. Westover 359 U.S. At 511, Title 28 USC. 1331 secures to The U.S. District Court subject-matter jurisdiction over petitioner 42 USC. 1983 Law suit claims in The case 26-CV-00025 arising under The laws of The United States according to The U.S. Supreme Court Decision Arbaugh v. Y+H Corp 546 U.S. 500, 503-505 (2006), subject-matter jurisdiction, Because it involves A courts power to hear A case can never Be forfeited or waived according to The Decision, Arbaugh v. Y+H Corp 546 U.S. At 514 The Judiciary Act of 1789 sec. 11, (1 Stat. 78) conferred on The Federal courts jurisdiction over all suits in equity according to The U.S. Supreme Court Decision Trump v. CSA, Inc. 606 U.S. 831, 841 (2025), The equity jurisdiction of The Federal courts is The jurisdiction in equity exercised By The High Court of Chancery in England at The time of The adoption of The Constitution and The enactment of The original Judiciary Act 1789 (1 Stat 73) according to The U.S. Supreme Court Decision Trump v. CSA Inc 606 U.S. At 854-856, in Santos-Zacaria v. Earland 598 U.S. 411, 416 (2023), The U.S. Supreme Court hold That Because courts are not able to exceed limits on Their adjudicative Authority, They cannot grant equitable exceptions to jurisdictional rule, in Porter v. Warner Holding Co. 328 U.S. 395, 398 (1946) The U.S. Supreme Court hold That unless A statute in so many words, or By A necessary and inescapable inference, restricts The courts jurisdiction in equity, The full scope of That jurisdiction is to Be recognized and Applied, The great principles of equity, securing complete justice should Be yielded to light inferences, or doubtful consideration.

[Reason For granting The Petition continued]

IN SECURITIES AND EXCHANGE COMMISSION V. JARKESY 603 U.S. 109, 128 (2024), The U.S. Supreme Court Hold That IF A suit is in The Nature of AN ACTION AT common LAW, Then The matter presum- ptively concerns private rights AND ADJUDICATION By AN Article 3 court is MANDATORY, AND IN STERN V. MARSHALL 564 U.S. 462, 484 (2011), The U.S. Supreme Court Hold That, when A suit is made of The STUFF OF The TRADITIONAL ACTIONS AT common LAW Tried By The Courts At Westminster in 1789, AND is Brought WITHIN The BOUNDS OF Federal Jurisdiction, The responsibility For Deciding That suit rest with Article 3 Judges in Article 3 Courts, in petitioner case The Court Barred petitioner 42 USC. 1983 Legal Action For A jury To Determine petitioner LIABILITY For The 1,000 Dollar AND 6,500 Dollar Civil penalty in The context of petitioner legal claim For 25,000,000 million Dollars punitive Damages AND Barred Appellate review OF The order, LOOK AT APPENDIX B-C, Appellate Jurisdiction To review The U.S. District Court order is secured To The U.S. Supreme Court By Title 28 USC. 2106 AND Article 3 sec. 2 However This Jurisdiction is DeFeated, Usurped By The U.S. District Court Jurisdictional Bar ON Petitioner 42 USC. 1983 LAW suit AND The Bar ON Appellate review From The U.S. District Court order Dismissing The case LOOK AT APPENDIX B-C, Therefore petitioner Do Not Have Any other Adequate means To Obtain A jury Trial, relief sought By writ OF Mandamus, The U.S. Supreme Court has promised The right To Issuance OF writ OF Mandamus To require jury Trial where it has Been Improperly Denied, in BEACON THEATRES INC V. WESTOVER 359 U.S. At 511, petitioner 7th. Amend. right To jury Trial has Been Improperly Denied By The U.S. District Court refusal To comply with The Jurisdictional Obligation To Adjudicate petitioner 42 USC. 1983 LAW suit To Allow A jury To Determine The issue OF petitioner

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[REASON For granting The Petition continued]

LIABILITY for civil penalties in The Amount of 1,000 Dollars AND 4,500 Dollars in The context of petitioner Legal claim for 25,000,000 million Dollars in punitive Damages AND By The District Court Barring Appellate review of The Dismissal of The Case, Therefore writ of Mandamus to require Jury Trial for A Jury to Determine The Issue of Liability for civil penalties in The context of petitioner legal claim for 25,000,000 Dollars punitive Damages is Necessary AND Appropriate in Aid of The U.S. Supreme Court Jurisdiction AS promised By The U.S. Supreme Court in Beacon Theatres Inc. v. Westover 359 U.S. At 511

3. Writ of Mandamus to require Jury Trial is Necessary AND Appropriate in Aid of The U.S. Supreme Court Jurisdiction AS promised By The U.S. Supreme Court AS A right in Beacon Theatres Inc v. Westover 359 U.S. 500 (1959)

The U.S. Supreme Court has promised The right to issuance of writ of Mandamus to require Jury Trial where it has Been Improperly Denied in Beacon Theatres Inc. v. Westover 359 U.S. At 511. Both The majority of The Court AND Desent Agree That issuance of writ of Mandamus is A right where The right to Jury Trial has Been Improperly Denied. petitioner 7th. Amendo. right to Jury Trial Has Been Improperly Denied By The US District Court refusal to comply with The Jurisdictional obligation to Adjudicate petitioner 42 USC, 1983. Law suit to Allow A Jury to Determine The Issue of petitioner Liability for civil

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Supreme Court of The United States

[REASON FOR GRANTING THE WRIT CONTINUED]

penalties in the context of petitioner legal claim for 25,000,000 million dollars punitive damages ~~AND BY~~ barring appellate review of the dismissal of the case, therefore writ of mandamus to require jury trial for a jury to determine the issue of liability for civil penalties in the context of petitioner legal claim for 25,000,000 million dollar punitive damages is necessary and appropriate in aid of the US Supreme Court jurisdiction, as promised by the US Supreme Court in Beacon Theatres Inc. v. Westover 359 U.S. at 511.

[CONCLUSION]

petitioner petition for writ of mandamus should be granted to require a jury trial, because the U.S. Supreme Court has promised the right to issuance of writ of mandamus to require jury trial where it has been improperly denied in Beacon Theatres Inc. v. Westover 359 U.S. 500, 511 (1959), petitioner right to jury trial for a jury to determine the issue of petitioner liability for civil penalties in the amount of 4,000 dollars and 1,500 dollars in the context of petitioner legal claim for 25,000,000 million dollars punitive damages has been improperly denied, therefore writ of mandamus is necessary and appropriate in aid of the U.S. Supreme Court jurisdiction.

Signed This 16 Day of July 2026
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