

26-5778

No. _____

ORIGINAL

In The

Supreme Court of the United States

Supreme Court U.S.
FILED

JUN 25 2026

OFFICE OF THE CLERK

In re JAMES F. SMYTHE,

Petitioner.

PETITION FOR
AN EXTRAORDINARY
WRIT OF HABEAS CORPUS

JAMES F. SMYTHE
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Pro Se Petitioner

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Counsel for Respondents

QUESTIONS PRESENTED

I. Is the U.S. Government's Means of/to Detaining, Active Method(s) and Form(s) of Custody, Ongoing Surveillance, and Enhanced Interrogation of Petitioner a Violation of Petitioner's First and or Fourth Amendment Rights?

II. Is the U.S. Government's Means of/to Detaining, Active Method(s) and Form(s) of Custody, Ongoing Surveillance, and Enhanced Interrogation of Petitioner Cruel and Unusual Punishments Inflicted in Violation of Petitioner's Fifth, Sixth, and or Eighth Amendment Rights?

III. Is the U.S. Government's Custody and or Custodial Treatment a Violation of Petitioner's Statutory Rights (viz., 18 U.S.C. § 241; 18 U.S.C. § 1201, 18 U.S.C. § 2236; 18 U.S.C. §§ 2510-2521; 18 U.S.C. § 4001; 42 U.S.C. § 1983; 42 U.S.C. § 2000dd, &c.)?

IV. What Article I Legislative Act(s) of Congress, Article II Executive Act(s) of the President, and or Article III Order(s) of the Judiciary enabled, and are currently sustaining, Petitioner's Custody and Custodial Treatment?

V. What Article, Section, and Clause of the U.S. Constitution Grants Trial or Appellate Court Judges the Lawful Authority or Permissible Discretion to obstruct, preclude, or disclaim purview of the Privilege of the Writ of Habeas Corpus by personally defining, and thereby judicially declaring against the grain of alleged claims and available evidence, that a U.S. Citizen is not in U.S. Government Custody (i.e. only by the unchecked personal belief(s) and *ipse dixit(s)* of the Judge)?

1 VI. Did the U.S. District Court for the District of Columbia and or Court of
2 Appeals for the District of Columbia Circuit violate *stare decisis* and or
3 vexatiously burden Petitioner's Constitutional Right(s) by precluding his sole
4 pathway to resurrect his Civil Liberty(s) from Custody's bond?

5 VII. Under this Court's Doctrine of interpreting *Pro Se* pleadings with
6 benevolence, did the Court of Appeals itself have an independent Constitutional
7 or Lawful Duty to grant a Writ of Habeas Corpus or issue an Order to Show Cause
8 why the Writ should not be granted?

9 VIII. In what ways, and to what extent pursuant to each way named, if any,
10 does the Supreme Court acknowledge, assess, and or incorporate the applicable
11 and relevant letter and spirit of 29 U.S.C. §§ 701 et seq. and 42 U.S.C. §§ 12101
12 et seq. in defining, interpreting, and applying this Court's *Pro Se* Complaint
13 Doctrine?

14 IX. Is there Statutory Inadequacy in, or *stare decisis* deficiency regarding,
15 28 U.S.C. §§ 2254-2255—viz., “under sentence,” e.g.—that restrains or truncates
16 the necessary utility or plain meaning textual scope of 28 U.S.C. § 2241 such that,
17 in circumstances like those described herein, the Writ of Habeas Corpus, and
18 thereby that which it affords, are suspended too far from reason's reach?

19 X. In light of the Fifth Circuit granting Mandamus in *In re Google LLC*, Case
20 No. 25-40788 (5th Cir. 2026) to Control and Enforce Venue under 28 U.S.C. §§
21 1390-1413, did the District of Columbia Circuit create an impermissible or
22 untenable Circuit Split by denying Writ of Mandamus in Petitioner's case?

1 XI. Does the Supreme Court recognize any point or threshold at which a
2 Judicial Act or Decision—or its *ratio decidendi*—becomes so arbitrary, absurd,
3 incongruous, or unreasonable, or so disagreeable, foreign, offensive, or contrary
4 to Natural Justice and or Law's most Precious Principles that Absolute
5 Immunity—or the exigencies which require its sanctuary—becomes the greater
6 threat, offense, or harm to the Constitution than precisely that which Absolute
7 Immunity is declared to obviate, confront, or remedy?

8 XII. If all of the elements of judicial misconduct are established on behalf of
9 the two relevant lower courts (D.D.C. and D.C. Cir.) such that the nature, scale,
10 and or scope of bias and prejudice, and the substantial disadvantage(s) they
11 caused Petitioner, are irreversible and will necessarily infect any remanded
12 process with error of constitutional dimensions (i.e. remanding this matter to the
13 Federal District Court with jurisdiction precludes the possibility of fundamental
14 fairness), then does this Court create, *de facto* or *de jure*, a manifest miscarriage
15 of justice the District Court has no jurisdiction to surface and correct?

16 XIII. If the Supreme Court decides to hold an evidentiary hearing in the
17 above-named case, or appoints a Special Master to do so, then would Rule 28.8
18 bar and or prohibit Petitioner as a non-attorney proceeding *Pro Se* from necessary
19 oral argument and or hearing participation? If so, is this evidence and or proof
20 that Rule 28.8 omits and or lacks a necessary exemption clause for extraordinary
21 circumstances that are reasonably foreseeable (i.e. is Rule 28.8 inadequate and
22 or unconstitutional as it currently stands)?

1 **PARTIES, RULINGS, AND RELATED CASES**

2 Pursuant to Supreme Court Rules 12.6 and 14.1, *Pro Se* Petitioner, James
3 F. Smythe, submits the following certification:

4 **A. Parties**

5 Petitioner is **James F. Smythe**.

6 Respondents are Central Intelligence Agency (“CIA”), Defense
7 Advanced Research Projects Agency (“DARPA”), Department of Defense
8 (“DOD”), Department of Homeland Security (“DHS”), Federal Bureau of
9 Investigation (“FBI”), National Aeronautics and Space Administration
10 (“NASA”), and National Security Agency (“NSA”).

11 **B. Rulings and Related Cases**

12 **I.** The U.S. District Court for the District of Columbia’s (“D.D.C.”)—
13 Chief Judge James E. Boasberg presiding—*a priori* determinations
14 denying Mr. Smythe’s Motions/Petitions for a Writ of Habeas Corpus.

15 **II.** The U.S. Court of Appeals for the District of Columbia Circuit’s
16 (“D.C. Cir.”)—Judges Cornelia T.L. Pillard, Gregory G. Katsas, and
17 Bradley N. Garcia presiding—Denial of Mr. Smythe’s petition for Writ of
18 Mandamus requesting the enforcement, and or independent granting, of
19 a Petition for Writ of Habeas Corpus.

20 **III.** This case relates to D.C. Cir. Case Nos. **26-5302** and **26-5166**. This
21 case also relates to D.D.C. Case Nos. **25-cv-02778-JEB**, **25-cv-02780-**
22 **JEB**, and **25-cv-02781-JEB**.

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1 denial of his habeas petition, any such challenge must be
2 raised in an appeal from a final judgment in his case. It is
3 FURTHER ORDERED that the motion to expedite this
4 case be dismissed as moot. It is FURTHER ORDERED that
5 the motion to disqualify counsel be dismissed as moot. The
6 Department of Justice has not filed anything in this case.
7 Pursuant to D.C. Circuit Rule 36, this disposition will not
8 be published. Per Curiam. FOR THE COURT: Clifton B.
9 Cislak, Clerk. BY: Selena R. Gancasz, Deputy Clerk.”

10 On September 22, 2026, the U.S. Court of Appeals for the District of
11 Columbia Circuit—Judges Srinivasan, Henderson, Millett, Pillard, Wilkins,
12 Katsas, Rao, Walker, Childs, Pan, and Garcia presiding—denied Petitioner’s
13 Combined Petition for Rehearing *En Banc*. The full text of this Order is as follows:

14 “ORDER: Upon consideration of the petition for rehearing
15 en banc and the supplements thereto, and the absence of a
16 request by any member of the court for a vote, it is
17 ORDERED that the petition be denied. *Per Curiam*. FOR
18 THE COURT: Clifton B. Cislak, Clerk. BY: Daniel J. Reidy,
19 Deputy Clerk.”
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22

STATEMENT OF JURISDICTION

U.S. Const. Art. III, § 2, Cl. 1, states: "The judicial Power shall extend to all Cases, in Law and Equity, arising under this Constitution, the Laws of the United States, and Treaties made, or which shall be made, under their Authority." U.S. Const. Art. III, § 2, Cl. 2, states: "In all the other Cases before mentioned, the supreme Court shall have appellate Jurisdiction." U.S. Const. Art. I, § 9, Cl. 2, states: "The Privilege of the Writ of Habeas Corpus shall not be suspended." 28 U.S.C. § 2241 states: "Writs of habeas corpus may be granted by the Supreme Court." Accordingly, this Court has jurisdiction under U.S. Const. Art. I, § 9, Cl. 2, U.S. Const. Art. III, § 2, and 28 U.S.C. §§ 2241-2255. (see *Cohens v. Virginia*, 19 U.S. 264 (1821); *Ex parte Tobias Watkins*, 28 U.S. 193 (1830); *Ex parte Milligan*, 71 U.S. 2 (1866); *Ex parte Yerger*, 75 U.S. 85 (1869); *Frank v. Mangum*, 237 U.S. 309 (1915); *Bowen v. Johnston*, 306 U.S. 19 (1939); *United States v. Hayman*, 342 U.S. 205 (1952) *Baker v. Carr*, 369 U.S. 186 (1962); *Fay v. Noia*, 372 U.S. 391 (1963); *Felker v. Turpin*, 518 U.S. 651 (1996); *Boumediene v. Bush*, 553 U.S. 723 (2008)).

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22	Thomas Paine, <i>Common Sense</i> (W. & T. Bradford 1776)	39

1 **STATEMENT OF THE CASE AND RULE 20.4(a) DISCLOSURE**

2 Pursuant to 28 U.S.C. §§ 2241-2242, Respondents—by a collaboration,
3 manner, and virtue not knowable to Petitioner—currently have Petitioner in
4 Unconstitutional Custody subject to Cruel and Unusual Punishments Inflicted
5 in Violation of Petitioner's First, Fifth, Sixth, and or Eighth Amendment Rights.
6 Petitioner's custody is precisely a category or class of custody, exile, and or
7 deprivation the Writ of Habeas Corpus was originally intended, designed, and
8 enacted to remedy. (see *Ex parte Bollman and Swartwout*, 8 U.S. 75, 95 (1807);
9 *Ex parte Tobias Watkins*, 28 U.S. 193, 201 (1830)). Viz., a category or class of
10 custody, exile, and or deprivation this Court has already defined and recognized
11 as "not under the direction of the court," but "by a different and distinct
12 authority." (see *Ex parte Yerger*, 75 U.S. 85, 100 (1869)). Accordingly, Petitioner
13 "is entitled to his immediate release." (see *Fay v. Noia*, 372 U.S. 391, 402 (1963)).
14 (see also *Ex parte Milligan*, 71 U.S. 2 (1866)).

15 To clarify, petitioner is not an enemy combatant within the meaning of
16 Public Law 107-40, but resides in U.S. Government Custody at a distance that
17 incorporates, involves, and effectuates far more "probing into an individual's
18 private life and thoughts" relative to Yaser Esam Hamdi's "Government's
19 detention" in Guantanamo Bay. (see *Davis v. Mississippi*, 394 U.S. 721, 727
20 (1969); *Hamdi v. Rumsfeld*, 542 U.S. 507, 509 (2004)). (see also *Mapp v. Ohio*,
21 367 U.S. 643 (1961)). Petitioner presents no agentic risk of spreading
22 communicable disease(s) within the meaning of 42 U.S.C. § 264(b), but resides in

1 U.S. Government imposed isolation that far exceeds both the severity and
2 duration of Ellen Siegel's isolation. (see *United States v. Shinnick*, 219 F.Supp.
3 789, 790 (E.D.N.Y. 1963)). Petitioner is not an offender or threat within the
4 meaning of Public Law 109-248, but—in both form and effect—is subjected to
5 U.S. Government imposed conditions that supremely exceed the nature, scope,
6 and scale of Pietro Polizzi's "unconstitutional" conditions under 18 U.S.C. §
7 3142(c). (see *United States v. Polouizzi*, 697 F.Supp.2d 381, 386 (E.D.N.Y. 2010)).
8 Furthermore, Petitioner is not an Alien. Thereby, he is inherently incapable of
9 foreign aggression. Therefore, the U.S. Government has no power to exclude
10 Petitioner from the Privilege of the Writ of Habeas Corpus and or Suspend his
11 Access or Rights, "as a matter of course," thereto. (see Art. I, § 9, Cl. 2; *Ex parte*
12 *Milligan*, 71 U.S. 2, 131 (1866); *Kiyemba v. Obama*, 555 F.3d 1022 (D.C. Cir.
13 2009); *The Chinese Exclusion Case*, 130 U.S. 581 (1889)).

14 In attacking the custody, restraint of liberty, and deprivation of right
15 imposed on him by the U.S. Government, Petitioner plainly set forth a case
16 arising under the Constitution in the most appropriate and or natural venues
17 (i.e. D.D.C. and D.C. Cir.). Viz., Petitioner cogently plead his case under 18 U.S.C.
18 § 241; 18 U.S.C. § 1201, 18 U.S.C. § 2236; 18 U.S.C. §§ 2510-2521; 18 U.S.C. §
19 4001; 42 U.S.C. § 1983; 42 U.S.C. § 2000dd. Extending the above context, see also
20 "against the person's will and with a willful intent so to confine the victim,"
21 *Chatwin v. United States*, 326 U.S. 455, 460 (1946), and "Kidnapping in violation
22 of 18 U.S.C. § 1201(a)," *United States v. Walker*, 934 F.3d 375, 378 (4th Cir. 2019).

1 Pursuant to Rule 20.4(a), Petitioner made application for Habeas relief to
2 both D.D.C. (Chief Judge James E. Boasberg presiding) and D.C. Cir. (Judges
3 Cornelia T.L. Pillard, Gregory G. Katsas, and Bradley N. Garcia presiding). In
4 response, both Courts abandoned, disallowed, and or disclaimed responsibility
5 for Petitioner's application for Habeas Relief via *ipse dixits* that, without good
6 cause or necessary justification, completely precluded Petitioner's Constitutional
7 Right to Habeas and, thereby, his Access—as a matter of course—to Federal
8 Court “inquiry” that *stare decisis* commands. (see *Harris v. Nelson*, 394 U.S. 286,
9 292 (1969)).

10 To clarify, the District Court did not consider the law or “ascertain for
11 themselves if the petitioner is in custody.” (*Coleman v. Thompson*, 501 U.S. 722,
12 736 (1991)). Viz., Chief Judge Boasberg—not standing on any “procedural” bar or
13 ground, and patently failing to “make clear by a plain statement”—simply
14 declared via Minute Order that an evidentiary hearing was illogical and to no
15 purpose because Petitioner is not in custody. (*Harris v. Reed*, 489 U.S. 255 (1989);
16 *Michigan v. Long*, 463 U.S. 1032 (1983)). Subsequently, D.C. Cir. simply affirmed
17 the District Court's inappropriate exercise of power dehors jurisdictional limits—
18 and thereby endorsed a clear “miscarriage of justice”—by declining “exercise of
19 jurisdiction which is given.” (*Sunal v. Large*, 332 U.S. 174, 189 (1947); *Cohens v.*
20 *Virginia*, 19 U.S. 264, 404 (1821)). (see also *Davis v. United States*, 417 U.S. 333,
21 346-347 (1974); *Wainwright v. Sykes*, 433 U.S. 72, 91 (1977); *McQuiggin v.*
22 *Perkins*, 569 U.S. 383, 1926 (2013)).

1 Accordingly, both D.D.C. and D.C. Cir. ignored *Stare Decisis's* mandate for
2 "a more searching investigation" to the effect of an inferior Court foreclosure on/of
3 precisely that which "must never be totally foreclosed." (*United States v.*
4 *Hayman*, 342 U.S. 205, 211 (1952); *Townsend v. Sain*, 372 U.S. 293, 312 (1963)).
5 This foreclosure is evidenced by (a) Petitioner's notice of Appeal before the
6 District Court (Case No. 25-cv-02781-JEB, ECF No. 31), now currently pending
7 before D.C. Cir. (Case No. 26-5302), and (b) Petitioner's Combined Rule 40
8 Petition For Rehearing & Rehearing En Banc (D.C. Cir. Case No. 26-5166., Doc.
9 #2184627). Therefore, pursuant to Rule 20.1 and 28 U.S.C. § 2242, adequate
10 relief cannot be obtained in any other form or from any other court.

11 In short, this petition is seeking "application of the maxim, *Ubi Jus Ibi*
12 *Remedium.*" Viz., operational affirmation from this Court that a "right of action
13 in the present instance is rendered irresistible by" the original intent, heritage,
14 and legacy of the Writ of Habeas Corpus. (see *Texas & Pacific R. Co. v. Rigsby*,
15 241 U.S. 33, 39-40 (1916)). To that aim, this petition is Petitioner's most
16 measured attempt to avert total foreclosure of Habeas, and that which it affords,
17 by rousing the original textual scope and tenacity of the Great Writ. (see *INS v.*
18 *St. Cyr*, 533 U.S. 289, 301 (2001)). (see also *Felker*, 518 U. S., at 663-664)).
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REASONS FOR GRANTING THE PETITION

Petitioner's above Jurisdiction Statement and Questions Presented are addressed, explained, and expanded upon below to demonstrate why the Supreme Court should grant this Petition. Of note, the below reasons and or justifications pertaining to the Questions Presented (i.e. below Part II) are, for the most part, provided *seriatim* and or in parallel respective to the order of the foundational queries from which they derive. Importantly, the below justifications develop and expand on the abuse of discretion constituted and or represented D.D.C. Judge James E. Boasberg declaring, and thereby holding adversely to Petitioner's case, that American Law does not recognize Epilepsy and Epileptic Seizures as disability under 29 U.S.C. §§ 701 et seq. and 42 U.S.C. §§ 12101 et seq. (i.e. effectuated prejudice with clear harm).

Part I. Jurisdiction and The Legacy of Habeas

As held in *Felker v. Turpin*, 518 U.S. 651, 658 (1996), this Court has sound "jurisdiction to entertain original habeas petitions" concerning or respecting restraint of liberty, detention, and custody as defined in § 14 of the Judiciary Act of 1789 and Ch. 28, § 1, of the Habeas Corpus Act of 1867. As stated in *Ex parte Yerger*, 75 U.S. 85, 100 (1869), "No objection was taken to the jurisdiction, though there, as here, it was evident that the actual imprisonment, at the time of the petition for the writ, was not under the direction of the court by whose order the prisoner was remanded, but by a different and distinct authority." Accordingly, neither the text of 28 U.S.C. §§ 2241-2255 nor American Court's interpretation of

1 them can interfere with, limit, or “deprive this Court of jurisdiction.” (see *Felker*
2 *v. Turpin*, 518 U.S. 651 (1996)).

3 Accordingly, because Petitioner’s Habeas “action in court”—within the
4 meaning of *Ex parte Milligan*, 71 U.S. 2 (1866)—arises “under the constitutional
5 and laws of the United States”—within the meaning of *Cohens v. Virginia*, 19
6 U.S. 264 (1821)—this Court has Jurisdiction to entertain this petition for Writ of
7 Habeas Corpus under U.S. Const. art. III, § 2, U.S. Const. art. I, § 9, cl. 2, and 28
8 U.S.C. §§ 2241-2255. (see “the writ of *habeas corpus* is the precious safeguard of
9 personal liberty and there is no higher duty than to maintain it unimpaired,”
10 *Bowen v. Johnston*, 306 U.S. 19, 26 (1939)).

11 In furtherance of this Jurisdiction claim, *Cohens v. Virginia*, at 404, states:

12 1) “It is most true that this Court will not take jurisdiction if it should not but it
13 is equally true, that it must take jurisdiction if it should,” 2) “We have no more
14 right to decline the exercise of jurisdiction which is given, than to usurp that
15 which is not given. The one or the other would be treason to the constitution,”
16 and 3) “We find this tribunal invested with appellate jurisdiction in all cases
17 arising under the constitution and laws of the United States. We find no exception
18 to this grant, and we cannot insert one.” (see also *Baker v. Carr*, 369 U.S. 186,
19 198-199 (1962)). Accordingly, if this Court disclaims Jurisdiction, then this Court
20 thereby admits or surrenders to an unprecedented diminution of its jurisdiction.

1 **Part II. Questions Presented**

2 Let's first consider Justice Brandeis's dissenting opinion in *Olmstead v.*
3 *United States*, 277 U.S. 438, 485 (1928):

4 "Decency, security and liberty alike demand that
5 government officials shall be subjected to the same rules of
6 conduct that are commands to the citizen. In a government
7 of laws, existence of the government will be imperilled if it
8 fails to observe the law scrupulously. Our Government is
9 the potent, the omnipresent teacher. For good or for ill, it
10 teaches the whole people by its example."; and

11 "Crime is contagious. If the Government becomes a
12 lawbreaker, it breeds contempt for law; it invites every
13 man to become a law unto himself; it invites anarchy."

14 Next, let this Court consider the following hypothetical as it presents a
15 scenario that is not all that different from, or foreign to, Petitioner's
16 circumstances (sans the geographical placement and resource supply dynamics
17 being parallel):

18 "A small assortment or group of Federal Agents, Officers,
19 or Officials from the CIA, DARPA, DOD, DHS, FBI, and or
20 NSA go rogue Under Color of Law and take a U.S. Citizen
21 Hostage. Viz., places the Citizen in the basement of one of
22 their personal homes or in a secured building at an
undisclosed location on one of their personal properties.
Then, after securing Custody, initiates a psychological
warfare and enhanced interrogation regimen under color of
law in violation of 42 U.S.C. § 2000dd and Citizen's Fourth,
Fifth, and Eighth Amendment Rights to accomplish what
Bodily Humiliation and Waterboarding cannot. (see
Chandler v. United States, 171 F.2d 921, 926 (1st Cir.
1948); *Rasul v. Bush*, 542 U.S. 466 (2004); *Hamdan v.*
Rumsfeld, 548 U.S. 557 (2006); *American Civil Liberties*
Union v. Dept. of Justice, 681 F.3d 61 (2nd Cir. 2012).

1 Then, after successfully acquiring the information desired
2 and or sought, gives said Citizen a computer with Microsoft
3 Word, a PACER account, and access to Cornell Law
4 School's Legal Information Institute (i.e. publication of
5 Federal Rules of Civil Procedure, Federal Rules of
6 Appellate Procedure, and Rules of the Supreme Court).
7 Finally, after providing and or supplying the requisite
8 information and tools, gives said Citizen the following
9 command: "Now, as an unreleased Hostage, and without
any outside assistance, Free yourself from Custody (i.e.
Constitutional Crisis) by using your own individual
knowledge, education, and talents to Convince the Federal
Courts of this Country to take your Petition for a Writ of
Habeas Corpus seriously."

10 In this above hypothetical case, i.e. in a case like Petitioner's, **does this**
11 **Court faithfully or convincingly believe the Great Writ of a Habeas**
12 **Corpus should have no application, reach, utility, or relevance?** If this
13 Court does, does it also faithfully or convincingly believe the Founding Fathers
14 would themselves faithfully or convincingly believe the Great Writ of a Habeas
15 Corpus should be meaningless or irrelevant in this case? Accordingly, this
16 Petition, to Petitioner's knowledge, presents and highlights an unresolved and
17 never before adjudicated intersection and or collision between 18 U.S.C. § 241, 18
18 U.S.C. § 1201, 18 U.S.C. § 2236, 18 U.S.C. §§ 2510-2521, 18 U.S.C. § 4001, 28
19 U.S.C. §§ 2671-2680 (i.e. Federal Tort Claims Act), 42 U.S.C. § 1983, 42 U.S.C. §
20 2000dd, the Writ of Habeas Corpus, and *stare decisis* in the following cases:
21 *Marbury v. Madison*, 5 US 137 (1803); *Cohens v. Virginia*, 19 U.S. 264 (1821); *Ex*
22 *parte Tobias Watkins*, 28 U.S. 193 (1830); *Frank v. Mangum*, 237 U.S. 309 (1915);

1 *United States v. Hayman*, 342 U.S. 205 (1952); *Fay v. Noia*, 372 U.S. 391 (1963);
2 *Katz v. United States*, 389 U.S. 347 (1967); *Bivens v. Six Unknown Fed. Narcotics*
3 *Agents*, 403 U.S. 388 (1971); *Preiser v. Rodriguez*, 411 U.S. 475 (1973); *Heck v.*
4 *Humphrey*, 512 U.S. 477 (1994); *Felker v. Turpin*, 518 U.S. 651 (1996); *Kyllo v.*
5 *United States*, 533 U.S. 27 (2001); *INS v. St. Cyr*, 533 U.S. 289 (2001); *Hamdi v.*
6 *Rumsfeld*, 542 U.S. 507 (2004); *Rasul v. Bush*, 542 U.S. 466 (2004); *Rumsfeld v.*
7 *Padilla*, 542 U.S. 426 (2004); *Klayman v. Obama*, 142 F.Supp.3d 172 (D.D.C.
8 2015); *Boumediene v. Bush*, 553 U.S. 723 (2008); *United States v. Jones*, 565 U.S.
9 (2012); *United States v. Hasbajrami*, 945 F.3d 641 (2nd Cir. 2019)). Accordingly,
10 if this Court denies this petition, then this Court is thereby demonstrating, i.e.
11 silently holding, that 9/11 conspirators (i.e. those seeking America's Descent)
12 have greater Habeas Privileges than U.S. Citizens Faithfully defending their
13 Individual Rights, Our Constitution, and or Our National Cause (i.e. those
14 seeking America's Ascent).

15 In other words, given that the U.S. Constitution was designed to always
16 keep pace with, and never fall behind, the Industrial and Technological
17 Advancements of this Country, and given that the forces of tyranny forever lurk,
18 always lying in opportunistic wait, the Supreme Court should Grant this Petition
19 to demonstrate the application, reach, utility, and or relevance of the Writ of
20 Habeas Corpus and Suspension Clause of the U.S. Constitution have not been
21 narrowed and or been abandoned by the Judiciary. Viz., to show that the Writ of
22 Habeas Corpus and Suspension Clause have not lost ground vis-à-vis the

1 extraordinary Industrial and Technological Advancements that have only
2 expanded the modes, types, or forms of Unconstitutional Custody—and thereby
3 potential modes, types, or forms of cruel and unusual punishments—that can be
4 effectuated.

5 Accordingly, Petitioner's case presents this Court with a prime opportunity
6 to clarify if the language "under sentence" as used in 28 U.S.C. §§ 2254-2255
7 causes or compels impermissible truncation of 28 U.S.C. § 2241 or untenable
8 statutory deviation from the letter and spirit of § 14 of the Judiciary Act of 1789
9 (1 Stat. 73) and its sister document and clause, England's Magna Carta (1215),
10 Cl. 39 (viz., enables or endorses select types or forms of Unconstitutional
11 Custody). In furtherance of the above claim, England's *Magna Carta* (1215), cl.
12 39, states: "No free man shall be seized or imprisoned, or stripped of his rights or
13 possessions, or outlawed or exiled, or deprived of his standing in any way."

14 In interpreting the original intent of the Writ of Habeas Corpus with § 14 of
15 the Judiciary Act of 1789 as its lens, this Court stated: "No doubt exists respecting
16 the power" ... "for the purpose of inquiring into the cause of commitment" and
17 "No law of the United States prescribes the cases in which this great writ shall
18 be issued, nor the power of the court over the party brought up by it." (*Ex parte*
19 *Tobias Watkins*, 28 U.S. 193, 201 (1830)). (internal quotation marks omitted). In
20 corroborating and confirming that the original intent and purpose of the Writ of
21 Habeas Corpus must apply broadly and or universally to any/all Custody (i.e. not
22 just custody via a Court Order or Under Sentence), the Habeas Corpus Act of

1 1867, Ch. 28, § 1, states: "courts" ... "shall have power to grant writs of habeas
2 corpus in all cases where any person may be restrained of his or her liberty in
3 violation of the constitution, or of any treaty or law of the United States."

4 For example, as stated in *Ex parte Bollman and Swartwout*, 8 U.S. 75 (1807):

5 "Acting under the immediate influence of this injunction,
6 they must have felt, with peculiar force, the obligation of
7 providing efficient means by which this great
8 constitutional privilege should receive life and activity; for
9 if the means be not in existence, the privilege itself would
10 be lost, although no law for its suspension should be
11 enacted. Under the impression of this obligation, they give,
12 to all the courts, the power of awarding writs of habeas
13 corpus." (at 95); and

14 "The decision that the individual shall be imprisoned must
15 always precede the application for a writ of habeas corpus,
16 and this writ must always be for the purpose of revising
17 that decision, and therefore appellate in its nature." (at
18 101).

19 Importantly, this Court has already acknowledged that 28 U.S.C. §§ 2254-
20 2255 arbitrarily, and confusingly so, deviate from the original definition, intent,
21 and scope of the Writ of Habeas Corpus. For example, in *Davis v. United States*,
22 417 U.S. 333, 343 (1974), this Court held, "this microscopic analysis of § 2255
surely shows that the statutory language is somewhat lacking in precision."
Accordingly, the scope of the Supreme Court's Jurisdiction, willingness to hear,
and ability to Grant Habeas Relief under 28 U.S.C. § 2241 cannot be defined or
governed by the language, or plain text interpretation of, 28 U.S.C. §§ 2254-2255.
Yet, if this Court holds the plain text of 28 U.S.C. § 2241 governs or overrides the
right to action and or collateral attack terminology of 28 U.S.C. §§ 2254-2255,

1 then why do 28 U.S.C. § 2254 and 28 U.S.C. § 2254 (viz., would this not
2 demonstrate a Multiplicity of Statutes and or Statutory Duplicity)?

3 To illustrate, 28 U.S.C. § 2254 as a vehicle to collaterally attack custody
4 requires “custody pursuant to the judgment of a State court.” 28 U.S.C. § 2255 as
5 a vehicle to collaterally attack custody requires custody “under sentence of a court
6 established by Act of Congress.” However, what Statue explicitly commits
7 providing a petitioner with the proper vehicle to collaterally attack custody by
8 the U.S. Government effectuated under color of law in violation of unambiguous
9 controlling statutes like 18 U.S.C. § 4001, &c.? Accordingly, 28 U.S.C. § 2254 and
10 28 U.S.C. § 2255—i.e. the only two vehicles to collaterally attack unconstitutional
11 custody in the United States Code—do not make any “textual commitment” to
12 collateral attack regarding unconstitutional custody effectuated in violation of 18
13 U.S.C. § 4001. Thus, pleading from the perspective of devil’s advocate, does
14 petitioning the Supreme Court for a Writ of Habeas Corpus in a case like
15 Petitioner’s require him to demonstrate that Congress does in fact “hide
16 elephants in mouseholes”? (*Whitman v. American Trucking Assns., Inc.*, 531 U.S.
17 457, 468 (2001)).

18 If so, then the Court must wrestle with a significant consequence of holding
19 that pleading requirement. Viz., if Americans were detained and held hostage by
20 rogue U.S. Government Actors under color of law on U.S. Soil akin to how
21 Americans were detained and held hostage in Iran on November 4, 1979, this
22 Court would effectively be holding that 28 U.S.C §§ 2254-2255 are not proper

1 vehicles to attack custody and, therefore, the Privilege of the Writ of Habeas
2 Corpus does not exist for Americans in a Hostage Crisis on U.S. Soil when the
3 Hostage-taker is the U.S. Government. In other words, to keep the Suspension
4 Clause intact without transgression, it appears this Court is required to clarify
5 and or define what the true or proper statutory vehicle is for petitioner's like Mr.
6 Smythe (e.g. 28 U.S.C. § 2241 serves as an anchor to establish jurisdiction, but it
7 must also enable a right to collaterally attack U.S. Government-imposed
8 custody). But what then for the need or adequacy of 28 U.S.C §§ 2254-2255?

9 Incorporating Justice Scalia's opinions and *obiter dictum* in *MCI*
10 *Telecommunications Corp. v. American Telephone & Telegraph Co.*, 512 U.S. 218
11 (1994) and *Christensen v. Harris County*, 529 U.S. 576 (2000) here, and mutually
12 considering them with the opinions—including their *rationes decidendi*—of Chief
13 Justice Roberts, Justice Gorsuch, and Justice Kagan in *Loper Bright Enterprises*
14 *v. Raimondo*, 144 S.Ct. 2244 (2024), three (3) significant reasons why this Court
15 should grant this Petition can be coherently derived. First, this Court has a duty
16 to decide if Congress “has directly spoken to the precise question at issue.”
17 (*Chevron USA Inc. v. Natural Resources Defense Council, Inc.*, 467 U.S. 837, 842
18 (1984)). Second, pursuant to major questions doctrine, this Court has a duty to
19 independently identify the “clear congressional authorization for the authority”
20 Respondents exercised to harness Petitioner. (*West Virginia v. EPA*, 597 U.S. 697,
21 2595 (2022)). (internal citations omitted). Third, under the Administrative
22 Procedures Act—viz., 5 U.S.C. § 706—this Court has a duty pursuant to

1 determine if Congress “meant to confer such authority” and “to police the outer
2 statutory boundaries of those delegations”—especially in the context of U.S.
3 Government Custody dehors 18 U.S.C. § 4001 and the First, Fourth, and Eighth
4 Amendments (*West Virginia v. EPA*, 597 U.S. 697, 2595 (2022); *Loper Bright*
5 *Enterprises v. Raimondo*, 144 S.Ct. 2244, 2252 (2024)). (see also *Mapp v. Ohio*,
6 367 U.S. 643 (1961)).

7 Extending the above line of reasoning with a thought experiment to
8 demonstrate why the textual and functional scope of Habeas must apply as
9 broadly as possible, consider a case where a U.S. Citizen is in so cryptic a fashion
10 placed in Unconstitutional Custody by the U.S. Government under color of law,
11 and the U.S. Government denies all allegations of custody in response to the
12 Supreme Court granting the Great Writ in response to this Court’s inquiry (and
13 or refuses to comply or cooperate during the Habeas proceeding). In this potential
14 case, if the Supreme Court does not have access to the technical capability(s) and
15 or subject-matter expertise needed to determine in good faith if Custody as
16 alleged by Petitioner is corporal or veridical within the meaning of 18 U.S.C. §
17 4001—and neither its coercive power under 5 U.S.C. § 706(1) nor its Mandamus
18 power under 28 U.S.C. § 1361 are adequate or sufficient—then is the Supreme
19 Court forced to impermissibly “delegate a decision of such economic and political
20 significance to an agency” (i.e. a default to Chevron-like deference) due to want
21 of sufficient force or instrumentality? (*FDA v. Brown & Williamson Tobacco*
22 *Corp.*, 529 US 120, 160 (2000)).

1 While the above-described hypothetical may seem implausible, consider this
2 Court's now 140 year old wisdom as espoused in *Boyd v. United States*, 116 U.S.
3 616, 635 (1886): 1) "It may be that it is the obnoxious thing in its mildest and
4 least repulsive form; but illegitimate and unconstitutional practices get their first
5 footing in that way, namely, by silent approaches and slight deviations from legal
6 modes of procedure," and 2) "It is the duty of courts to be watchful for the
7 constitutional rights of the citizen, and against any stealthy encroachments
8 thereon. Their motto should be *obsta principiis*." Now, hand-in-hand, consider
9 the following excerpt from President John F. Kennedy's September 12, 1962 *We*
10 *choose to go to the Moon* speech, "we shall send to the moon, 240,000 miles away
11 from the control station in Houston, a giant rocket more than 300 feet tall, the
12 length of this football field, made of new metal alloys, some of which have not yet
13 been invented, capable of standing heat and stresses several times more than
14 have ever been experienced, fitted together with a precision better than the finest
15 watch, carrying all the equipment needed for propulsion, guidance, control,
16 communications, food and survival, on an untried mission, to an unknown
17 celestial body, and then return it safely to Earth, re-entering the atmosphere at
18 speeds of over 25,000 miles per hour, causing heat about half that of the
19 temperature of the sun." Of note, roughly 147 years separate Thomas Edison's
20 October 21, 1879 incandescent light bulb and America's footsteps on the Moon,
21 and roughly 57 years have elapsed since Buzz Aldrin and Neil Armstrong left
22 those magical prints on the moon. Point being? The Honorable Justices of

1 America's Highest Court need not vexatiously burden their imaginations to
2 appreciate that reinforced concrete walls and stainless steel bars owned and
3 operated by the Federal Bureau of Prisons (BOP) are not *sine qua nons* of
4 Unconstitutional Custody that, in accordance with the legal maxim *Ubi Jus Ibi*
5 *Remedium*, requires the American Judiciary's Jaws of Life.

6 Furthermore, Petitioner's case also highlights an Extraordinary Circuit
7 Split. Viz., the District of Columbia Circuit denied Petitioner's Mandamus
8 Petition to Control and Enforce Habeas Corpus Process (under 28 U.S.C. §§ 2241-
9 2255 and Suspension Clause of the U.S. Constitution) vis-à-vis the Fifth Circuit
10 granting a Mandamus Petition to Control and Enforce Venue under 28 U.S.C. §§
11 1390-1413. (see *In re Google, LLC*, 172 F.4th 450 (5th Cir. 2026)). In this regard,
12 this Court has recognized a Writ of Mandamus is "warranted to 'confine a court
13 to a lawful exercise of its prescribed jurisdiction' and to preserve the integrity of
14 the judicial process. *Cheney v. U.S. Dist. Court*, 542 U.S. 367, 380-81 (2004); *Ex*
15 *parte Peru*, 318 U.S. 578, 583 (1943)." (*In re Daniel E. Hall*, Supreme Court Case
16 No. 25-5715)).

17 On this note, Chief Justice John Marshall held, "It is emphatically the
18 province and duty of the judicial department to say what the law is. Those who
19 apply the rule to particular cases, must of necessity expound and interpret that
20 rule. If two laws conflict with each other, the courts must decide on the operation
21 of each." (*Marbury v. Madison*, 5 US 137, 177 (1803)). Based upon Petitioner's
22 interpretation and understanding of this quote, this Court has a duty to expound

1 and interpret if it is a correct rule or judicial operation that, concurrently,
2 Mandamus **is warranted** to compel and preserve integrity under 28 U.S.C. §§
3 1390-1413 but **is not warranted** to the same effect under 28 U.S.C. §§ 2241-
4 2255 and U.S. Const. Art. I, § 9, Cl. 2. Why should Venue have greater access to
5 the Privilege of the Writ of Mandamus than Constitutional and Civil Rights?

6 Additionally, Petitioner's case presents this Court with a prime opportunity
7 to consider, review, and rule on the finer and or more nuanced details of its *Pro*
8 *Se* Interpretation Doctrine as set forth in *Haines v. Kerner*, 404 U.S. 519, 520-521
9 (1972). It does so in a case in which: 1) there is an egregious Deprivation of Rights
10 Under Color of Law, 2) a U.S. Citizen is in need of the function the Writ of Habeas
11 Corpus was specifically designed to perform, 3) a Chief District Court Judge—i.e.
12 D.D.C. Judge James E. Boasberg—asserted Epilepsy as a condition, and
13 Epileptic Seizures as a symptom, does not constitute or qualify as Disability
14 under American Law(s) or controlling legal precedents, and 4) Petitioner
15 Fingerprinted this Court's and Respondent's personnel as a last resort measure
16 to preserve and or enforce the integrity of Due Process (and or any semblance
17 thereof). (see *Sparrow v. United Air Lines, Inc.*, 216 F.3d 1111, 1113 (D.C. Cir.
18 2000); *Brown v. Whole Foods Mkt. Grp., Inc.*, 789 F.3d 146, 152 (D.C. Cir. 2015).

19 Viz., remedy "outrageous" judicial conduct by the District and Circuit Courts
20 that precluded the Writ of Habeas Corpus's "objects" from being "attained by
21 motion" and the process of "material facts" from being "ascertained" as the law
22 requires (as opposed to "discharging" as a result or product of a lawful hearing

1 and or process). (see *United States v. Russell*, 411 U.S. 423, 431-432 (1973);
2 *Wetmore v. Karrick*, 205 U.S. 141, 151 (1907); *Cuddy*, 131 U.S. 280, 283 (1889);
3 *In re Wight*, 134 U.S. 136, 137 (1890)). More, beyond impermissible preclusion of
4 right, Chief District Court Judge James E. Boasberg acted “categorically beyond”
5 his authority by (1) declaring Petitioner is not in custody based entirely on *ipse*
6 *dixit* instead of factual evidence, (2) distorting—i.e. throwing away—“the
7 evidence” of Petitioner’s Disability, (3) “opining” on Petitioner’s “character” and
8 the “ultimate issue.” (*United States v. Márquez-Pérez*, 835 F.3d 153 (1st Cir.
9 2016)). These actions self-evidently caused Petitioner prejudice. For these
10 reasons, all of the “elements” of “judicial misconduct” are established. (Ibid.). For
11 these same reasons, Due Process violations are demonstrated in accordance with
12 *Mayberry v. Pennsylvania*, 400 U.S. 455, 465 (1971), which states:

13 “The concern of due process is with the fair administration
14 of justice. At times a judge has not been the image of ‘the
15 impersonal authority of law’ but has become so ‘personally
embroiled’ with a lawyer in the trial as to make the judge
unfit to sit in judgment.” (internal citations omitted).

16 Accordingly, Petitioner believes this Court has a duty to expound and
17 interpret the applicability, relevance, and Constitutional meaning of a Petitioner
18 like Mr. Smythe being coerced and or pushed by the Judiciary’s lack of care and
19 concern, and or malice, to engage in the type of Forensic Analysis the FBI
20 performs to prove crimes and secure prosecution of felonies for the sole purpose
21 of proving deprivation and safeguarding his relevant Constitutional Rights.
22 Where else, or how else, should this abuse of discretion and or error by the lower

1 courts be corrected and or remedied? In furtherance of this claim, *Pickett's Heirs*
2 *v. Legerwood*, 32 U.S. 144, 148 (1833) states, "if the error be in the judgment
3 itself, and not in the process, a writ of error does not lie in the same court, but
4 must be brought in another and superior court." (internal citations omitted).

5 Further, in continuing to entertain Petitioner's monetary claims (i.e. Bivens,
6 common-law tort, and constitutional tort claims) after relegating his equity
7 claims to the wayside (i.e. precluding/suspending Habeas), D.D.C. and D.C. Cir.
8 appear to have abandoned, obstructed, or preemptively frustrated the procedural
9 requirements and or "relationship" mechanics described by Justice Scalia in *Heck*
10 *v. Humphrey*, 512 U.S. 477, 487 (1994). In other words, the Lower Courts
11 prevented Petitioner from doing what the Law says he must. Therefore, the Court
12 should grant this Petition, because it presents a novel "collision" "at the
13 intersection of habeas and § 1983" that requires this Court to interpret and
14 expound on Congressional intent (i.e. to elucidate what Civil Party and or
15 Petitioner Protocol(s) are proper or required when Custody is effectuated in
16 violation of 18 U.S.C § 4001). Viz., Custody not pursuant to an Act of Congress
17 and where "state forum" is irrelevant. (Ibid.).

18 As a final consideration, Petitioner represents a U.S. Citizen at the forefront
19 and or frontier of demonstrating the capabilities of a non-attorney *Pro Se* party.
20 Viz., an educated citizen with love for country rapidly teaching himself the law
21 *ad hoc* in pursuit of petitioning the Government for a redress of grievances under
22 the purview of the First Amendment. On this point, § 35 of the Judiciary Act of

1 1789 expressly states: "parties may plead and manage their own causes
2 personally." However, in the event this Court decides to hold an evidentiary
3 hearing, or appoints a Special Master to do so, it is Petitioner's understanding
4 that Supreme Court Rule 28.8's applicable categorical prohibition will preclude
5 his necessary oral participation. This appears to create an issue of constitutional
6 dimensions, because Petitioner also believes he has a Constitutional Right to
7 orally plead and manage his case in this event. Moreover, Petitioner understands
8 this belief to be overwhelmingly grounded in the letter and spirit of the Founding
9 Father's Revolutionary Ideas and Constitutional Expositions.

10 Furthermore, the literal translation and meaning of Habeas Corpus is "you
11 have the body." Viz., as American Law has forever recognized without qualm,
12 question, or repeal, the adjective modifiers *ad Subjiciendum*, *ad Testificandum*,
13 and *ad Prosequendum* define and instruct why and how the Court is furnished
14 with the physical "body." Therefore, in the above-define "event," would Rule 28.8
15 not necessarily violate the literal meaning of the term "Habeas Corpus" by
16 banning the body and its voice from producing and or being produced? (it is
17 important to consider here that Petitioner readily admits his understanding of
18 Rule 28.8's applicability or scope may be mistaken due to want of experience).

19 That being said, and completing the claim just in case Petitioner is not
20 mistaken, consider Justice Clark's opinion in *Mapp v. Ohio*, 367 U.S. 643 (1961):
21 "Nothing can destroy a government more quickly than its failure to observe its
22 own laws, or worse, its disregard of the charter of its own existence." As stated

1 by Justice Brennan in *Goldberg v. Kelly*, 397 U.S. 254, 267 (1970): 1) "The
2 fundamental requisite of due process of law is the opportunity to be heard", and
3 2) "The hearing must be at a meaningful time and in a meaningful manner.
4 (internal citations omitted). As also stated by Justice Brennan: 1) "written
5 submissions do not afford the flexibility of oral presentations; they do not permit
6 the recipient to mold his argument to the issues the decision maker appears to
7 regard as important," and 2) "Particularly where credibility and veracity are at
8 issue" ... "written submissions are a wholly unsatisfactory basis for decision" ...
9 "Therefore a recipient must be allowed to state his position orally." (Ibid. at 269).
10 As by Justice Scalia in *Hill v. Colorado*, 530 U.S. 703 (2000): 1) "Even a law that
11 has as its purpose something unrelated to the suppression of particular content
12 cannot irrationally single out that content for its prohibition" (at 746), and 2) "it
13 is the right of the speaker in the public forum to be free from government
14 interference" (at 752). As Justice Brandeis articulated in *Whitney v. California*,
15 274 U.S. 357, 377 (1927):

16 "If there be time to expose through discussion the falsehood
17 and fallacies, to avert the evil by the processes of education,
18 the remedy to be applied is more speech, not enforced
19 silence. Only an emergency can justify repression. Such
20 must be the rule if authority is to be reconciled with
21 freedom. Such, in my opinion, is the command of the
22 Constitution. It is therefore always open to Americans to
challenge a law abridging free speech and assembly by
showing that there was no emergency justifying it."

Accordingly, if Rule 28.8 does potentially preclude Petitioner's participation as described above, then what emergency justifies this Court's censorship, repression, and or prohibition of Speech pursuant to § 35 of the Judiciary Act of 1789? If no emergency exists in this event, then what clear and present danger and or threat would Petitioner represent justifying Rule 28.8's enforcement? Surely, as demonstrated herein, Petitioner can do legal, philosophical, and professional justice to Oral Argument and or Evidentiary Hearing Participation without endangering the welfare of this Court, can he not?

CONCLUSION

Petitioner, Sat in Darkness, Brought down by the Labors of Justice, and Bound in Affliction because he hath petitioned the Government to redress its Absence Without Leave, hereby Respectfully asks this Court to analogously embody the Spirit of its Gavelian Breaking of Chains as depicted in Cliff Rogerson's editorial cartoon displayed fore John Marshall's metamorphic line of sight thanks to this Court's Curator, Matthew D. Hofstedt. (*United States v. El du Pont de Nemours & Co.* (1957)). Viz., allowing the Great Writ to Shatter the Cruel and Unusual Chains of Custody Prohibiting Petitioner's Life, Liberty, and Faithful Flight. (see U.S. Const. Amends. I, IV, V, VIII; 16 U.S.C. § 668; 18 U.S.C. § 241; 18 U.S.C. § 1201, 18 U.S.C. § 2236; 18 U.S.C. §§ 2510-2521; 18 U.S.C. § 4001; 42 U.S.C. § 1983; 42 U.S.C. § 2000dd; 50 C.F.R. § 22.6).

AMENDMENT BEFORE REVIEW

In Case No. 25-cv-02780-JEB (ECF No. 34, 2:15-16), Petitioner stated: "Now, the meaning of Mr. Smythe's Purple Signature should be self-evident." Pursuant to Rule 29.6, within the meaning of FRCP 16(a), and to obviate the ability or potential for any misunderstanding, Petitioner hereby Amends the Record before Review as follows: The overarching and cardinal meaning of Petitioner's Purple Signature is a Chromatic Statement that he: 1) believes American's Highest Civic Duty is impartial compromise and equitable participation, and 2) holds in heart and embodies in action America's full Political Spectrum. Reflecting on the words of Thomas Paine's Introduction in *Common Sense* (as made available by Michael S. Hart and Project Gutenberg): "**The cause of America** is in a great measure the cause of all mankind. Many circumstances hath, and will arise, which are not local, but universal, and through which the principles of all **Lovers of Mankind** are affected, and in the Event of which, their Affections are interested. The laying a Country desolate **with Fire and Sword**, declaring War against the natural rights of all Mankind, and extirpating the Defenders thereof from the Face of the Earth, is the Concern of every Man to whom Nature hath given the Power of feeling; of which Class, regardless of Party Censure, is the author." Thus, "Who the Author of this Production is, is wholly unnecessary to the Public, as the Object for Attention is **the Doctrine itself**, not the Man. Yet it may not be unnecessary to say, That he is unconnected with any Party, and under no sort of Influence public or private, but the influence of reason and principle."

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