No. 26-81

IN THE

SUPREME COURT OF THE UNITED STATES

DENNIS DEPPE,

Petitioner,

v.

SANDRA SOVINSKI ET AL.,

Respondents.

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

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

The judges of the U.S. District Court of the Middle District of Florida (FLMD) have been caught in organized crime with attorneys from the U.S. Department of Justice (DOJ) that has come from the military and links to employees from the Central Intelligence Agency (CIA) that served under the Obama/Biden Whitehouse administration. The Petitioner was stalked, assaulted, and battered in three different episodes by the U.S. military and his own DOJ trying to end cases. One of the episodes of stalking, assaults, and batteries was in the district court proceeding of this case, in which the FLMD judges Julie Sneed and Embry Kidd (now on the Eleventh Circuit) participated.

The FLMD judges are violating the district court's Local Rule 1.05(a) to become improperly assigned to cases for DOJ attorneys, without proper jurisdiction. Once the FLMD judge takes improper control of the case, they use their judicial positions and the DOJ protection to commit the crimes explained in this petition, in this case as part of the military bribery scheme. The organized crime includes the chief judge of the FLMD, Marcia Howard, who oversees the random judicial assignment set by the district court's Local Rule 1.05(a). One of the DOJ attorneys engaged with the FLMD judges in the court fraud is Randy Harwell in the Tampa, FL office.

The questions presented are:

1. Does a federal judge who knowingly violates and circumvents a district court's local rules, in this case Local Rule 1.05(a), to take improper

control of a case, have lawful jurisdiction of the case to which they took control through the violation?

2. Is an attorney employed by the state of Florida entitled to qualified immunity for commission of perjury in the U.S. Patent and Trademark Office, because of her state employment?

3. What steps do supreme court justices take when presented with evidence that organized government crime coming from the DOJ and military are coordinating with district court judges to engage in the stalking, assaults, and batteries of one of the parties in the case?

PARTIES TO THE PROCEEDING AND RELATED PROCEEDINGS

The parties to the proceeding below are as follows:

The Petitioner, and plaintiff-appellant, is Dennis G. Deppe, for himself.

The Respondents, and defendants-appellees, are Sandra Sovinski and Svetlana Shtrom.

Directly related proceedings to this case are:

1. 11th Circuit, Dennis Deppe v. Sandra Sovinski et al., Case No. 25-10646-C, filed February 28, 2025.

2. U.S. District Court of the Middle District of Florida, Dennis G. Deppe v. Sandra M. Sovinski and Svetlana Strom, Case No. 6:23-cv-1484-JSS-UAM, filed August 2, 2023.

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PETITION FOR WRIT OF CERTIORARI

Dennis G. Deppe respectively petitions for a writ of certiorari to review the judgement and opinion of the United States Court of Appeals for the Eleventh Circuit in this case.

OPINIONS BELOW

The Eleventh Circuit order denying the petition for rehearing en banc is attached at Appendix 1a. Related to the first question is the Eleventh Circuit unpublished opinion supporting its denial of the appeal, attached at Appendix 3a. Related to the second and third questions are the district court judgement attached at Appendix 10a, and dismissal order attached at Appendix 12a.

JURISDICTION

The Eleventh Circuit issued its opinion on December 18, 2025 (Appendix 3a), and issued its order denying rehearing en banc on February 6, 2026. (Appendix 1a.) This Petition was express U.S. mailed and postmarked to the clerk on May 7, 2026, and timely filed pursuant to Supreme Court Rules 13.3, 29.2 and 30.1. This Court has jurisdiction under 28 U.S.C. §1254(1).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The federal codes and Florida statutes at issue include: 42 U.S.C. §1983; 42 U.S.C. §1985; 42 U.S.C. §1986; 18 U.S.C. §1512; 18 U.S.C. §1513; 18 U.S.C. §1621; 18 U.S.C. §1623; 28 U.S.C. §1746, Fl. St. §837; Fl. St. §914.

INTRODUCTION

This is a case in which the Petitioner was targeted with organized government crime in U.S. District Court of the Middle District of Florida (FLMD) and U.S. Department of Justice (DOJ), that came from the U.S. military. The Petitioner was stalked, assaulted, and battered during the district court proceeding as part of this case. It was the third episode in which the Petitioner has been stalked, assaulted, and battered by attorneys working with the military, DOJ, and Florida judges involving an intellectual property theft and take-over of the Petitioner's company. The district court proceeding has so far departed from the accepted and usual course of judicial proceedings due to organized government crime operating in the FLMD and DOJ involving judges and attorneys, as to call for the exercise of this Court's supervisory power.

The court records show that the DOJ is able to preselect those FLMD judges for their cases who then engage in white-collar crimes and the assaults used in extortion attempts of attorneys working with the DOJ and military. The selected judges violate the district court's Local Rule 1.05(a) that governs random judicial assignments, and take control of the case without proper jurisdiction. The selected FLMD judges then participate in both white-collar crimes and the stalking, assaults, and batteries with the attorneys working with the DOJ and military, trying to cover up the crimes committed as part of the organized government crime involving the DOJ and military.

The stalking, assaults, and batteries occurred during the district court proceeding of this case. It was the third such episode involving the military, attorneys working with the military and DOJ, including Jeffrey Weiss, the opposing counsel, and Florida judges. The judges from the FLMD involved in the crimes are the chief judge, Marcia Howard, Wendy Berger, Embry Kidd (now on the 11th Circuit), and Julie Sneed. The opposing counsel, Jeffrey Weiss, was part of a prior Florida state case in which Weiss worked with the military research program monitors and DOJ employees attempting to use the stalking, assaults, batteries, confinement, and poisoning, to extort the Petitioner to sign fraudulent settlement agreements involving the military.

The case against the two defendants is for damages caused to the Petitioner due to their contract breaches and perjury in the USPTO as part of their participation with the military and DOJ in organized government crime. The stalking, assaults, and batteries using military tactics and RF technologies during the district court proceeding was to cover-up the contract breaches and crimes of perjury they committed in the USPTO.

The judges were part of an expansive bribery scheme from the military and their efforts were to cover up the contract breaches. This is a difficult task because records cannot be purged from the USPTO and the contract breaches and perjury are in the UPSTO records as shown. The judges of both court systems were working for the military and DOJ and used pretext to try to cover-up the contract breaches, and refused to rule on the perjury in the USPTO.

The attorney Sovinski committed many acts of perjury in the USPTO and attempted to recant statements that were already proven false, filed new false declarations into the USPTO under the penalty of perjury with changed statements, and violated federal and Florida perjury laws against improper recantation.

Once the contract breaches are identified and shown, the district court order and appellate judges' opinion can be seen as largely pretextual in attempts to cover up the breaches and to obscure the crimes of perjury committed by the two defendants in the USPTO. The judges know the Florida Supreme Court has consistently ruled that state actors are not entitled to qualified immunity, which is why the judges have tried to cover up the breach of contracts, and claimed the defendants have qualified immunity to commit perjury, asserting that perjury in the USPTO is within their discretionary authorities.

The arguments from the district court dismissal order and appellate judges' unpublished opinion fall apart in the light of the contract breaches also evidence in the USPTO patent records. This Petition instead provides this Court the necessary information to understand how the illicit enterprises from the military and DOJ are able to use the FLMD and Eleventh Circuit judges to commit crimes, and what they have done in proceeding, and shows the contract breaches and perjury in the USPTO are obvious.

The court records show that the DOJ has been able to place organized government crime into the Eleventh Circuit through the appointment of judges, and is actively doing so. The former FLMD judge Embry Kidd participated in the organized crime with the military and DOJ and when he was confirmed for the position on the Eleventh Circuit in November, 2024. The facts provide evidence the DOJ and military are using bribery to buy the judges' participation, and advancement up the judicial ladder in what appears effectively to be extortion for the judge's participation in the crimes and public corruption.

The Second Amended Complaint (SAC), RA 17-182,[1] show how the Petitioner and his research and development company were targeted in one of the military bribery schemes using multiple university technology licensing offices controlled by military and bribery schemes. The organized government crime involving the military, DOJ, and university technology licensing offices has a nexus to the Central Intelligence Agency (CIA) of the Obama/Biden Whitehouse administration.

The military research program monitors are using university attorneys and administrators to steal scientific results and early-stage technologies from the university

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[1] RA refers to Record on Appeal.

technology licensing offices that they then use in international influence peddling and bribery of U.S. and foreign government officials. As the Navy program monitor Deborah Van Vechten explained to the Petitioner in Q4 2020 while she and other military program monitors participated with the FBI and attorneys in stalking, assaulting, battering, confining, and poisoning the Petitioner, it's just the way they do business.

One of the military employees reported by her own military program monitor to be involved is Catherine Marsh, a former CIA employee under the Obama/Biden administration. Marsh was assigned as a director of a military research agency, the Intelligence Advanced Research Projects Agency (IARPA), during which the Petitioner was attacked in Q4 2020 during a Florida state case. Foreign countries are involved in the scheme using university technology licensing offices with the military to steal science and early-stage technologies from the U.S. One of those is Israel. Karen Carlisle of the Army's Ft. Belvoir office is also involved, and admitted to the Petitioner she knew he had been stalked, assaulted, and battered using the military's compact and high-pulse power RF transmitters that can be used covertly to shoot and injure people.

The Petitioner's company was developing new types of laser inventions and had valuations from potential investors of $25M. The military was angered by the Petitioner because his laser inventions contradicted military claims by military program monitors who were funding different types of lasers, that had no scientific basis. The military and CIA set up a "pump and dump" scheme that promised large government contracts to quickly boost the perceived value of the company to over $100M. Equity positions to military research program monitors and attorneys to participate, bringing them in like farm animals to a feeding trough. The $100M appears to hit a threshold that brought the Florida federal and state judges, attorneys, defense contractors, and government officials into the bribery scheme with the military.

Three universities are involved with the military research program monitors, the University of Illinois, The University of Texas at Austin, and the University of Central Florida (UCF). Information and records show military program monitors "sold" their scheme, which involved a take-over of sdPhotonics, into the high government levels of the Obama/Biden administration that involved the employees of the CIA.

The military used two university attorneys who committed white-collar crimes as part of the military take-over attempts. One is Kyle Zumberger employed by The University of Texas at Austin who committed identity theft and tax fraud in the Petitioner's tax records with the Internal Revenue Service (IRS).[2]

In September, 2023, the IRS issued its determination from an internal investigation that tax documents Zumberge filed into the Petitioner's tax records without Petitioner's knowledge in 2018 constitute tax fraud and identity theft.[2] The identify theft and tax fraud were part of military intellectual property theft scheme involving the Petitioner's laser inventions and patents that begun at The University of Texas in 2017.

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[2] Zumberger made admissions in emails to having filed tax documents into the Petitioner's tax records for the 2017 tax year as part of the military scheme that IRS investigation has determined were fraudulent and identity theft, with IRS finding in Second Amended Complaint.

The second university attorney involved in the military's organized government crime scheme is, Sandra Sovinski, employed by UCF. Beginning in late Summer 2019, Sovinski breached contracts, UCF patent rules and regulations, and committed perjury in the USPTO on patents owned by the Petitioner's company to damage the company. Sovinski began breaching contracts and committing perjury in the USPTO in late Summer 2019, after learning eight months prior in December, 2018, that the Petitioner would move his company from space it had leased with the UCF technology incubator.

This FLMD case was filed on August 2, 2023. Discovery was not allowed by the judges during the sixteen-month proceeding, as the Petitioner was stalked, assaulted, and battered as part of the district court proceeding. When these failed, on February 18, 2025, the district judge Julie Sneed falsified contract terms in a dismissal order to cover up the defendants' breach of contracts. Appendix 12a. Sneed claimed that Sovinski had qualified immunity through state employment to commit perjury USPTO, and declined to rule on the issue of perjury.

Sneed falsified the contract terms in her February 18, 2025 dismissal order that contradict the SAC and its attachments. By February 18, 2025 when Sneed issued the dismissal order, Embry Kidd had already joined the Eleventh Circuit. When the appellate court saw what the district judge Sneed had done with falsified the terms of the 2014 IP Agreement in her district court dismissal order, they refused to perform the *de novo* review required by U.S. Supreme Court case law.

Sneed did not question whether the two defendants are entitled to qualified immunity for breach of contract. Sneed also did not question whether breach of contract would cross the "bright-line" threshold set by Supreme

Court case law, since the two defendants oversee the UCF technology licensing office that relies on UCF-2.029 and issued the contract they breached, and Defendant Sovinski is an attorney at UCF. Both Sovinski and Shtrom are experts on the UCF-2.029.

Instead, on February 18, 2025, Sneed issued a surprise dismissal order falsely asserting for the first time in the sixteen-month proceeding that the 2014 IP Agreement is independent of UCF-2.029. Appendix 12a. The Sneed assertion that the 2014 IP Agreement is independent of UCF-2.029 contradicts the government records attached to the SAC. Sneed falsified the terms of the 2014 IP Agreement are fully pursuant to the UCF-2.029, and committed her own crimes now on the FLMD docket. She and the other judges have the same problems as the two defendants, as due the judges with the Local Rule 1.05(a) violations. They have no means to remove the evidence of their crimes on the dockets.

Sneed also asserted that the Petitioner thought signing an employment agreement was outside the ministerial duties of the defendants. This is a false argument. The Petitioner said violating UCF-2.029 was outside the defendants' ministerial duties, and that the 2014 IP Agreement is pursuant to UCF-2.029.

The Petitioner's appeal briefs filed to the Eleventh Circuit were filled with information showing that the 2014 IP Agreement is pursuant UCF-2.029, and that defendants violated UCF-2.029 and the 2014 IP Agreement. A word search of the appellate opinion issued December 19, 2025 shows that "UCF-2.029," or combinations of the regulation, are not contained in the appellate opinion. Appendix 3a. The three appellate judges assert they performed the *de novo* review but they did not. The Petitioner pasted the 2014 IP Agreement in the appellate brief along with clauses from UCF-2.029.

Instead, the appellate judges withheld all government records attached to the SAC showing contract breaches from their unpublished opinion because the breach of the 2014 IP Agreement is obvious from the government records. The three appellate judges then issued a pretextual opinion that falsified the §1983 code itself. As the basis for their judgement, the appellate judges asserted that "*acting under color of state statute, ordinance, regulation, custom, or usage*" entitles a state actor to qualified immunity, the opposite of the §1983 code.

The three appellate judges acknowledged that the UCF attorney Sovinski may have committed perjury in the USPTO, but asserted she was entitled to qualified immunity to do so because she acted under color of state law. Appendix 3a. It's clear that Sneed and the Eleventh Circuit judges already known the Florida Supreme Court has consistently ruled that state actors are **not** entitled to qualified immunity for breach of contract, which is why Sneed falsified the contract terms in her February 18, 2025 order.

Therefore, pursuant to Rule 10 of the U.S. Supreme Court Rules, the appellate court has decided an important federal question in a way that conflicts with all other appellate courts in the U.S. and decisions of this Court, and in conflict with the Florida Supreme Court, and with the legal definitions of the elements of a claim pursuant to §1983 used by other appellate courts and the U.S. Supreme Court.

STATEMENT OF THE CASE

A. Contract breaches and perjury in the USPTO; Stalking, assaults, and batteries by military, attorneys, and DOJ during Florida court proceedings.

In December, 2018, Sovinski learned the Petitioner would start a move of his company from the UCF technology incubator and resign his position. The move had already been set up with the UCF director of the incubator, Gordon Hogan, and scheduled for 18 months to continue the company's research and development contracts and move its extensive research equipment. RA 40-41, ¶¶ 114-122.

Email records show that when Sovinski learned of the move in December 11, 2018, she took immediate action and contacted Svetlana Shtrom to learn about the Petitioner's patents. RA 147. The Petitioner and Shtrom had worked for the prior five years on patents covering the Petitioner's laser inventions being developed by his company in the UCF technology incubator.

In January, 2019 Sovinski tried to terminate a newly signed lease, demanded immediate eviction of the company, and demanded the Petitioner's resignation. Why she made the demands remained unclear, and Sovinski' attempted eviction partially failed. The company moved from the space at the end of June, 2019, and the Petitioner resigned from any employment with UCF at the start of August, 2019.

By mid-August, 2019, again with no explanation as to why, Sovinski began breaching contracts between UCF and the Petitioner, and violating UCF-2.029, breaching the 2014 IP Agreement and UCF Collective Bargaining Agreement. As part of this, Sovinski began committing perjury in the USPTO by filing false declarations on patents between sdPhotonics and UCF that had either just issued with the USPTO.

The facts would later make clear that Sovinski, who is an attorney at UCF, was part of an illicit criminal government enterprise that came from the military, involving military research program monitors, who had been contracting with sdPhotonics, and instead had set up fraud schemes trying to take-over sdPhotonics.

Sovinski filed her false USPTO declarations under the penalty of perjury, and falsified the terms of the agreement she attached, a 2014 IP Agreement that is fully pursuant to UCF-2.029, and UCF-2.029 was also in fact the UCF rule she was violating by filing any assertions of ownership rights at that stage.

To cover her actions, Sovinski omitted any mention of UCF-2.029 in her USPTO declarations, and claimed the 2014 IP Agreement granted UCF "any and all" rights to the Petitioner's inventions. Such an agreement is unheard of in U.S. universities, and in fact the 2014 IP Agreement is fully pursuant to UCF Regulations UCF-2.029 that govern employees' rights to their inventions, and the UCF regulations she violated. RA 116.

The first term of the 2014 IP Agreement is shown below from the actual 2014 IP Agreement. It clearly states that all terms of the Agreement are defined pursuant to UCF-2.029. RA 116.

1. I have received and reviewed University Regulation UCF-2.029, entitled "Patents, Trademarks, and Trade Secrets." All terms in this Agreement are defined pursuant to UCF-2.029.

Sovinski omitted any mention of UCF-2.029, and asserts the 2014 IP Agreement in the declarations she filed into the USPTO. The Florida Statute 1001.72 is pretext, and simply states UCF is a state institution. Sovinski's false assertion omitting any mention of UCF-2.029 and falsely asserting the 2014 IP Agreement she attached to the declarations instead grants "any and all" rights is shown below copied directly from the Sovinski USPTO declaration Exhibit of the SAC (RA 149-152):

On August 13, 2014, in recognition of his employment obligations, **Dennis Deppe executed an assignment of any and all rights to UCF** for all inventions conceived or invented during his employment. This assignment document is presented for recordation herewith. In accordance with Florida Statute 1001.72,

Sovinski committed additional counts of perjury in violations of 18 U.S.C. §§1621, 1623 and Fl. St. §837 in each of the USPTO declarations she filed under the penalty of perjury, trying to claim that the Petitioner had somehow played a trick to make the patent applications joint applications between sdPhotonics and UCF. She would later find out her statements were proven false by prior patent records in the USPTO and tried to correct them, creating dispositive proof of her perjury.

On December 12, 2019, the Petitioner filed suit in Florida state court for damages caused to him and his company involving the contract breaches and perjury in the USPTO. However, once the complaint for that lawsuit was filed, the attorneys the Petitioner hired to litigate the case refused to litigate the case. Sovinski learned in the Florida state case. This is when statements in her USPTO declarations were proven false by prior USPTO records, and she tried to correct the false statements with a new round of altered declarations.

In April, 2020, Sovinski tried to remove the statements that falsely blamed the Petitioner for the joint applications, by filing new declarations that placed strike-throughs in some of the statements proven false by prior patent records. The statements are shown below, dated 4/7/2020 and initialed "SMS" (See RA 162-166):

> Previously Recorded Document is erroneous. Dennis Deppe filed Provisional application no. 62/459,078, *pro se*, contrary to UCF regulations and policies~~, and improperly designated his own company,~~ SMS
> ~~sdPhotonics, LLC, as a co-applicant~~. ~~UCF's prosecution counsel carried on the improper co applicant~~ 4/7/2020
> ~~designation during the non-provisional phase.~~ UCF's prosecution counsel also did not record any assignment documents for the application, also contrary to UCF policies.

The strikethroughs by Sovinski violate 18 U.S.C. § 1621, 1623 and Fl. St. §837, and still did not remove all the false statements in the above paragraph. The UCF prosecution counsel did file the assignment documents showing the assignments were joint. Below is the section of the assignment documents filed by UCF's prosecution counsel for the application showing that Applicant 1 is also Assignee 1, and is the University of Central Florida Research Foundation. RA 137-143.

Applicant 1			[Remove]
If the applicant is the inventor (or the remaining joint inventor or inventors under 37 CFR 1.45), this section should not be completed. The information to be provided in this section is the name and address of the legal representative who is the applicant under 37 CFR 1.43; or the name and address of the assignee, person to whom the inventor is under an obligation to assign the invention, or person who otherwise shows sufficient proprietary interest in the matter who is the applicant under 37 CFR 1.46. If the applicant is an applicant under 37 CFR 1.46 (assignee, person to whom the inventor is obligated to assign, or person who otherwise shows sufficient proprietary interest) together with one or more joint inventors, then the joint inventor or inventors who are also the applicant should be identified in this section. [Clear]			
● Assignee	Legal Representative under 35 U.S.C. 117		Joint Inventor
Person to whom the inventor is obligated to assign.		Person who shows sufficient proprietary interest	
If applicant is the legal representative, indicate the authority to file the patent application, the inventor is:			
[▾]			
Name of the Deceased or Legally Incapacitated Inventor :			
If the Applicant is an Organization check here. ☒			
Organization Name	University of Central Florida Research Foundation, Inc.		
Mailing Address Information For Applicant:			
Address 1	12201 Research Parkway, Suite 501		
Address 2			
City	Orlando	State/Province	FL
Country	US	Postal Code	32826-3246
Phone Number		Fax Number	
Email Address			
Additional Applicant Data may be generated within this form by selecting the Add button. [Add]			

This is followed by the next section in the assignment documents that show that sdPhotonics is Applicant 2, and that sdPhotonics is also Assignee 2. (RA 137-143).

Applicant 2			Remove
If the applicant is the inventor (or the remaining joint inventor or inventors under 37 CFR 1.45), this section should not be completed. The information to be provided in this section is the name and address of the legal representative who is the applicant under 37 CFR 1.43; or the name and address of the assignee, person to whom the inventor is under an obligation to assign the invention, or person who otherwise shows sufficient proprietary interest in the matter who is the applicant under 37 CFR 1.46. If the applicant is an applicant under 37 CFR 1.46 (assignee, person to whom the inventor is obligated to assign, or person who otherwise shows sufficient proprietary interest) together with one or more joint inventors, then the joint inventor or inventors who are also the applicant should be identified in this section.			Clear
(◉) Assignee	Legal Representative under 35 U.S.C. 117	Joint Inventor	
Person to whom the inventor is obligated to assign.	Person who shows sufficient proprietary interest		
If applicant is the legal representative, indicate the authority to file the patent application, the inventor is:			
Name of the Deceased or Legally Incapacitated Inventor :			

If the Applicant is an Organization check here. ☒			
Organization Name	sdPhotonics, LLC		
Mailing Address Information For Applicant:			
Address 1	450 South Lake Jessup Avenue		
Address 2			
City	Oviedo	State/Province	FL
Country	US	Postal Code	32765
Phone Number		Fax Number	
Email Address			
Additional Applicant Data may be generated within this form by selecting the Add button.			Add

Below is the UCF prosecution counsel's signature showing that he filed the patent assignment documents dated July 12, 2017, as Sovinski also knew when she filed her declarations into the USPTO. RA 137-143.

Signature: Remove

NOTE: This form must be signed in accordance with 37 CFR 1.33. See 37 CFR 1.4 for signature requirements and certifications.					
Signature	/Neil R. Jetter/			Date (YYYY-MM-DD)	2017-07-12
First Name	Neil	Last Name	Jetter	Registration Number	46803
Additional Signature may be generated within this form by selecting the Add button.					Add

Below is the clause UCF-2.029(4)(d) that Sovinski and Shtrom violated by retroactively trying to assert new ownership rights with the USPTO declarations. UCF-2029(4)(d) states that the University gets only one event to assert rights in an employee invention, and in that event the University must have paid all costs and expenses of patenting, and for developing the invention. Defendant Shtrom's office is who was invoicing the Petitioner for the costs, and both she and Sovinski are experts on the UCF-2.029 and that Shtrom's office set up the invoicing and joint ownership because of prior development of the inventions by the Petitioner's company, sdPhotonics, RA 113, 118:

(d) In the event the University asserts its rights in the Invention, all costs and expense of patenting, developing, and marketing the Invention and related activities, including those which may lead to active licensing of the Invention, shall be paid by the University.

The Petitioner's company paid for the research and development of the laser inventions while leasing space from the UCF incubator, and Defendant Shtrom's UCF technology licensing office had been invoicing the company since 2012 for the patent filing on the laser invention. RA 120-125.

The event in which UCF asserted its rights with the Petitioner's company occured when the patent applications were filed, in the case above on July 12, 2017. The two defendants therefore breached the 2014 IP Agreement they attached to their USPTO declarations, as well as the Petitioner's collective bargaining employment agreement that contains the same clause as UCF-2.029(4)(d).

In May, 2020, after Sovinski filed the changed declarations, Jeffrey Weiss and the Petitioner's own attorneys presented the Petitioner with a fraudulent settlement agreement that involved the military. The patent filings by Sovinski did not involve the military, and the military had already secured government rights in the invention. The Petitioner then fired his attorneys and hired John Bustamate who recommended filing a federal complaint in the FLMD court.

It was Bustamante who, in July, 2020, first tried to intimidate the Petitioner, and informed the Petitioner that Bustamante had information that the FLMD judge

Wendy Berger was part of organized crime and would be assigned to the case. Bustamante then filed the federal complaint in August, 2020, and Wendy Berger was assigned to the case. However, Bustamante filed an improper complaint for the federal court that brought suit against UCF, and UCF has sovereign immunity. The Petitioner then instructed Bustamante to dismiss the case without prejudice because of the improper federal complaint.

In October, 2020, the Petitioner was presented a second fraudulent complaint that had been prepared by Bustamante, Sovinski, Jeffrey Weiss, and others, again involving the military. This time when the Petitioner refused, he was threatened by one of the attorneys involved, John Vetter. The Florida lawsuit was a whistleblower lawsuit, and Vetter demanded and threatened the Petitioner to sign the agreement, or the Petitioner would "find out what happens to a whistleblower in Florida."

In Q4 2020, the Petitioner did find out, and he was extorted with the threats, and then stalked, assaulted, battered, confined, and poisoned, by the military research program monitors and attorneys working with the military and DOJ trying to complete the take-over. The attorneys involved with the military include the opposing counsel, Jeffrey Weiss and his law firm, Bustamante, Vetter, and others, and agents of the Federal Bureau of Investigation (FBI), and unknown stalkers.

The Petitioner knows names of the attorneys, military program monitors involved, because they used a barrage of threatening and harassing phone calls to the Petitioner as he was being stalked, assaulted, and battered. They explained in taunts how they had been offered equity positions based on the laser inventions, and would have very enjoyable retirements because of the Petitioner's inventions. The Petitioner was subsequently confined and poisoned in Q4 2020 by the military program monitors carrying out the threats of the attorneys.

The Navy program monitor Deborah Van Vechten participated in the in Q4 2020 stalking, assaults, batteries, confinement, and poisoning during a Florida state proceeding. The opposing counsel of this case, Jeffrey Weiss, along with a number of other attorneys brought into the military scheme that promised the "$100M" payoff. A separate lawsuit has been filed on November 15, 2024 against Van Vechten, Weiss, Vetter, Bustamante, and others involved in the attacks on the Petitioner in Q4 2020 as part of the Florida state proceeding, and this is *Deppe v. Vetter et al.*, FLMD Case No, 6:24-cv-2098 filed November 15, 2024.

The military research program monitor, William Harrod of the Intelligence Advanced Research Projects Agency (IARPA), blamed his actions as part of the intellectual property theft as being ordered by his supervisor, Catherin Marsh. Marsh was an employee from the CIA employ under Obama/Biden Whitehouse administration, and was placed as director of IARPA.

The military program monitors blamed the stalking involving the FBI on then U.S. president Donald Trump, which was a scapegoat. The records by then showed the illicit enterprise was linked to the CIA of the Obama/Biden Whitehouse administration. RA 97.

All these facts are now the subject of the separate federal complaint based on what happened in the Florida whistleblower lawsuit, and is the case *Deppe v. Vetter et al.*, FLMD Case No. 6:24-cv-2098. The Third Amended Complaint of that case provides details and names of many of the government employees who participated with the military in the take-over scheme by the stalking, assaults, batteries, confinement poisoning, and additional fraud schemes.

In Q1 2021 the Petitioner began ending the contracts with the military program monitors, and contacted other attorneys, Kevin Keeling and Mark Solomon, in an attempt to correct the USPTO records. At the same time, he began working to dismiss the Florida state lawsuit. One of the attorneys involved, Robin Foret, admitted she knew the organized crime scheme had come out of the Biden administration, although the Petitioner had never mentioned Biden. The Petitioner wanted to file a complaint with the DOJ Inspector General (IG) Horowitz, which he did, informing Horowitz that FBI was involved. The Petitioner hired Kevin Keeling and Mark Solomon.

By October, 2021, he began finding information that identity theft had taken place in his IRS tax records. The identity theft was by an attorney from The University of Texas at Austin as part of the military organized government crime scheme to take-over Petitioner's inventions.

By May, 2022, Keeling and Solomon also had refused to take action on the perjury in the USPTO. They finally informed the Petitioner independently that they knew from others that the FLMD judges were part of the military corruption, and they did not want to take legal action. The Petitioner fired Keeling and Solomon and began to prepare his own corrections to file in the USPTO.

In September, 2022 the military and UCF learned the Petitioner intended to take his own separate action to correct the assignments of the patents. This triggered the second stalking episode described in the Second Amended

Complaint. The Petitioner was stalked so heavily with military tactics and military-style RF transmitters that by the end of December, 2022, the Petitioner was forced out of the U.S. and into Europe. The RF transmitters use modern electronics to fire what the military calls RF "bullets." At sufficiently high power, the RF bullets can knock a person out, which the military had learned from military technicians involved with high power radar as early as the 1960's.[3]

The Petitioner was initially stalked in Europe the first several weeks with the same food and water poisoning tactics, and the high-power pulsed RF transmitters that federal law enforcement and the military possess. The stalking, assaults, and batteries in Europe helped confirm that the stalking, assaults, and batteries were being set up by the CIA and FBI who have offices in Europe. The Petitioner filed a report to the DOD Inspector General and faxed information to offices of multiple U.S. senators. After a few weeks in Europe, the stalking, assaults, and batteries then began to subside.

The Petitioner stayed in Europe until mid-March, 2023, and returned to the U.S. after the stalking, assaults, and batteries had subsided in Europe. When the Petitioner returned to the U.S. and uncovered email, he found that one of the senators had sent the Petitioner's information separately to the DOD Inspector General. The Petitioner was contacted by an Army investigator in supposed response to the DOD report. The Army investigator reviewed the information, explained that it

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[3]https://mriquestions.com/uploads/3/4/5/7/34572113/auditory_frey_rf_hearing_jappl.1962.17.4.689.pdf; J.C. Lin, "The Microwave Auditory Effect," IEEE J. Electromagnetics, RF, and Microwaves in Medicine and Biology 6, pp. 16 – 28 (March, 2022); See also https://en.wikipedia.org/wiki/Microwave_auditory_effect

was public corruption, and should be turned over to the DOJ.

B. District court proceeding: Fraud upon the court, Local Rule 1.05(a) violations by Berger, Kidd, Howard; stalking, assaults, and batteries of petitioner during district court proceeding; Falsification of contract terms of 2014 IP Agreement by Sneed in dismissal order to cover up breach of contract.

The Petitioner filed the federal complaint of this case on August 2, 2023, seeking damages for the contract breaches and perjury in the USPTO. Wendy Berger was again assigned to the case. Jeffrey Weiss again represented the UCF defendants. RA 4, Doc. 1.

On the August 16, 2023, the Petitioner filed the Disclosure Statement Pursuant to Federal Rule of Civil Procedure 7.1 and Local Rule 3.03, of the potential conflict of interest for the FLMD judge Berger. RA 5, Doc. 8. The Petitioner reviewed his records carefully, and on October 24, 2023, filed the motion to disqualify Berger and explained the information Bustamante had given the Petitioner in the prior case to which the district judge Berger was assigned that caused the conflict of interest pursuant to 28 U.S.C. §455. RA 7, Doc. 36. Berger ignored the motion.

The Petitioner filed a second motion to disqualify the FLMD judge Berger on January 23, 2024 with additional information that attached an affidavit. (RA 10, Doc. 69). Berger still ignored the motion.

Then, in early March, 2024, the attacks with food and water poisoning and RF transmitters again began in Florida as part of the district court proceeding. The Petitioner was continually cyber-stalked, and the physical stalking, assaults, and batteries used the same tactics and RF transmitter technologies that had been used to drive the Petitioner from the U.S. at the end of December, 2022.

On March 18, 2024, after the stalking, assaults, and batteries had again begun, with no action by Berger in response to the motions to disqualify, the case was reassigned to the FLMD judge Julie Sneed without explanation. RA 10, Docs. 71,72. From the end of March, 2024 into May, 2024, the stalking, assaults, and batteries intensified. RA 11, Doc. 86.

The Petitioner made the decision not to leave the U.S. in this episode, and began filing the details of the attacks on the FLMD court's docket. These were filed on May 16, 2024. RA 12, Doc. 88, May 21, 2024, RA 12, Doc. 89, and on May 24, 2024, RA 12, Doc. 91. On May 28, 2024, the magistrate judge Embry Kidd issued the order informing the Petitioner that the filings about the stalking were improper, and to cease such filings or face sanctions. RA 12, Doc. 92.

A few weeks later, on June 20, 2024 the magistrate judge denied the Defendants' motion for qualified immunity and to dismiss, denied the stay of discovery, and issued the order for the Petitioner to file the SAC. RA 13, Doc. 95. The Petitioner filed the SAC on July 1, 2024. RA 13, Doc. 96. On July 15, 2024, the Defendants again filed a motion to stay discovery. RA 13, Doc. 97.

When the Petitioner tried to begin discovery seeking to depose Sovinski, opposing counsel refused, and instead filed a second motion on August 6, 2024 demanding the discovery be stayed along with a motion to dismiss based on bald assertions of qualified immunity. RA 13, Docs. 102, 103. On August 7, 2024, before the Petitioner could respond to the Defendants' motion to stay discovery, the magistrate judge Kidd issued the stay for the Defendants. RA 14, Doc. 104.

On November 15, 2024, the Petitioner filed the separate federal complaint in the FLMD, now the *Deppe v. Vetter*, FLMD Case No. 6:24-cv-2098, for civil rights violations due to the stalking, assaults, batteries, confinement, and poisoning in Q4 2020 during the Florida state case.

By then the Petitioner had also learned through court records that Florida's 9th Judicial Circuit Court had not assigned a judge to the Florida whistleblower case for more than eight months, as Jeffrey Weiss and the Petitioner's own attorneys were trying to obtain the first fraudulent settlement agreement with the military.

When the Petitioner filed the new complaint on November 15, 2024, Wendy Berger and Embry Kidd were reassigned. This occurred with Wendy Berger's full knowledge that Bustamante had already identified her as violating Local Rule 1.05(a) to become selectively assigned to cases, because of the earlier motions to disqualify in the separate case. Without realizing it, the FLMD judges confirmed what Bustamante what had said about Berger. The repeated violations involving Berger and Kidd of the Local Rule 1.05(a) in three cases produces a probability of violations that straightforwardly produces the probability >99.96%, beyond any reasonable doubt.

It appears that in the sixteen months Embry Kidd was magistrate judge on the case before joining the Eleventh Circuit, he could not bring himself to issue a magistrate report. Instead, on February 18, 2025, with Kidd no longer on the case, Sneed issued the surprise dismissal order granting qualified immunity. RA 15, Doc. 115. Sneed admitted in her dismissal order that the Defendants violated UCF-2.029 and refused to rule on the perjury in the USPTO. Instead, she falsified the terms of the 2014 IP Agreement to get around the breach of contract, omitted any mention of UCF-2.029, and claimed the 2014 IP Agreement granted all rights to UCF. Sneed's false assertion from her dismiss order is shown below, RA 15, Doc. 115, Appendix 14a:

> "Plaintiff concedes that as a condition of his employment with UCF, he executed an Intellectual Property Agreement that granted UCF title to inventions "in the field or discipline in which [he] [was] employed by [UCF]" or which were "made with the use of [UCF's] [s]upport."

Sneed used surprise and misleading conduct, and at no point during the sixteen months of the district court proceeding had the defendants asserted in court filings that the 2014 IP Agreement was not pursuant to UCF-2.029, something they knew the Petitioner would correct. The defendants relied only on the bald assertion that they were entitled to qualified immunity based on the fact that they were state actors and had acted under color of state law.

Sneed's dismissal order violates the tenets of contract law. By trying to issue her order to protect the defendants from their breach of contract, she argued in her dismissal order that though the Petitioner may have had employment rights to his inventions through UCF-2.029, he gave up those employment rights pursuant to UCF-2.029 in exchange for his employment. Sneed's argument is nonsensical because she wrote it for wrong purpose. She intentionally omitted information from her statement that the 2014 IP Agreement is pursuant to

UCF-2.029 to cause the statement to be misleading, and intentionally concealed the fact that the 2014 IP Agreement is fully pursuant to UCF-2.029.

Sneed's purpose was clearly intended to use the misleading conduct towards the Petitioner to induce the appellate judges to withhold the government records from their appellate proceeding.

C. Appellate court proceeding: Refusal by appellate judges to perform *de novo* review; Assertion by appellate judges that "acting under color of state statute, ordinance, regulation, custom, or usage" of §1983 code entitles a state actor to qualified immunity.

The Petitioner filed the notice of appeal on February 28, 2025. The Appellant Reply Brief was filed on June 20, 2025.

The Eleventh Circuit judges did not take action on the appeal until they were contacted by the Petitioner through motion on December 16, 2025, with information and records showing the FLMD judges are engaged in Local Rule 1.05(a) violations. Three days later on December 19, 2025, the appellate judges issued their unpublished opinion that refused to perform the de novo review, and asserted instead that acting "under color of state law" entitles the state actor to qualified immunity. The text from the opinion is below (underline added), Appendix 3a, pg. 6]:

> Here, the record demonstrates that the district court properly found that Sovinski and Shtrom had acted within their discretionary authority by making USPTO filings and canceling Deppe's company's lease of UCF lab space. Deppe's complaint conceded that Sovinski and Shtrom were state employees who acted at all relevant times under color of state law. The district court properly found that Sovinski had discretionary authority to make USPTO filings and terminate Deppe's lease on UCF's behalf based on her position as deputy general counsel of research. As director of the OTT, Shtrom similarly had discretionary authority to make USPTO filings. The USPTO filings attached to Deppe's complaint verify that they asserted UCF's ownership interests in the patents and signed filings under their position's titles.

A word search shows the appellate judges omitted any mention of UCF-2.029, and the 2014 IP Agreement about which the appeal centered. Note that the unpublished opinion by the appellate judges steers clear as to why the defendants would be entitled to qualified immunity for committing crimes of perjury in the USPTO in their attempt with the military to take-over the Petitioner's company, or how they have discretionary authority to commit perjury in the USPTO.

The appellate judges used bald assertions, because they could not address the actual 2014 IP Agreement, that its terms are pursuant to UCF-2.029, and because it shows evidence beyond any reasonable doubt that defendant Sovinski committed crimes of perjury in the USPTO.

REASONS FOR GRANTING THE WRIT

A. Rule 10 and the organized government crime involving the CIA, military, DOJ, Obama/Biden Whitehouse administration, and attorneys and FLMD and Eleventh Circuit judges using federal

court proceedings for that organized government crime.

The issues involving the organized government crime from the military that uses the DOJ and judges of the FLMD and Eleventh Circuit court systems directly read upon Rule 10 and the U.S. Supreme Court justices' roles in the maintenance of the U.S. court systems. These illicit enterprises operating through the military have historically involved members of secret societies that include the free masons and skull and bones. These secret societies are described briefly in the next sections and are forming illicit enterprises against their own governments psychopathic in nature. The secret societies inhabit the U.S. universities through past CIA programs, in this case stealing science and early-technologies using attorneys from the same university technology licensing offices.

What is coming into the Florida court systems and the Eleventh Circuit appellate judges in the form of organized government crime in the cases described in this Petition, and now the well-known involvement by DOJ attorneys in the Epstein crimes linked to the CIA counterpart Mossad in Israel, are directly in Rule 10 of the Supreme Court Rules 10(a) and 10 (c). Rule 10(a) states the compelling reasons for granting the writ relevant to the DOJ and judicial crimes and corruption given below:

> "A United States court of appeals has entered a decision in conflict with the decision of another United States court of appeals on the same important matter; ... or has so far departed from the accepted and usual course of judicial proceedings, or sanctioned such a departure by a lower court, as to call for the exercise of this Court's supervisory power..."

The Eleventh Circuit falsified the §1983 code, asserting that the element of the §1983 claim that states "Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State..." entitles that person to qualified immunity. The Eleventh Circuit furthermore has the same information as the Supreme Court justices in this Petition, and have been provided undeniable evidence of the Local Rule. 1.05(a) violations by FLMD judges in organized government crime, with the stalking, assaults, and batteries during the district court proceeding. The Eleventh Circuit appellate judges remained silent the Local Rule 1.05(a) violations and fraud upon the court by FLMD judges in multiple orders after learning the fraud had been discovered.

Rule 10(c) states the compelling reason for granting the writ is also as shown below, and describes the Eleventh Circuit opinion that uses the fraudulent misrepresentation of the §1983 code itself, and the refusal to perform the *de novo* appellate review. Rule 10(c) states:

> "... a United States court of appeals... has decided an important federal question in a way that conflicts with relevant decisions of this Court."

B. Secret societies in the U.S. and violations by FLMD judges of federal criminal codes 18 U.S.C. §§ 1512, 1513, and similar Florida criminal statutes in Fl. St. §§914.22, 914.23 through coordinated stalking, assaults, and batteries during district court proceeding.

The Petitioner was attacked by an illicit enterprise operating through the military and U.S. government with a nexus to the CIA from the Obama/Biden Whitehouse administration. Secret societies are not illegal, but can easily be taken over by psychopaths, and secret societies are heavily used to commit crimes against the secret society's own country to overthrow the existing government. To test and prepare the members to commit the crimes and support other members who commit crimes, the secret society uses a theatrically staged murder ritual while other members engage in chants, screaming, and other bizarre behavior as the staged murder is enacted. A video became available of the theatrically staged murder that is part of the initiation ritual for skull and bones at Yale.[4]

What may seem like a bizarre ritual has in fact historically been used to prepare members of secret societies to commit crimes against their own country for more than one thousand years, and overthrow a country's existing government. George Washington was a member of the free masons, along with many of his compatriots, and did just that. He and his compatriots overthrew the English government, at least partially, to win the U.S. war of independence.

However, the founding forefathers did not just split their spoils as they could have, and instead created the U.S. constitution with a government filled with checks and balances. It's very doubtful that George Washington possessed what modern science has identified as the psychopathic brain structure possessed by high-functioning psychopaths who form or take-over the secret societies that are then used to form illicit enterprises.[5]

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[4] https://www.youtube.com/watch?v=DD-JttocUzk; See also https://www.youtube.com/watch?v=XR_MLU8LcBs.

[5] See https://psychology-tools.com/test/pcl-22.

The U.S. history indicates that what is believed to be the best-known CIA psychopath, Allen Dulless,[6] worked with his CIA compatriots trying to take-over the U.S. citizens through mind control. The psychopathic brain structure can now be determined through modern brain imaging.[7]

While the CIA claimed that their intentions were to protect the U.S. using Mind Kontrol Ultra (MK Ultra), the Church commission found instead they distributed their MK Ultra through more than 80 U.S. universities in an effort to control the minds of the university students.[8] The CIA used MK Ultra to test every chemical and technique imaginable trying to exert mind control. When they came to believe their own CIA researchers may rat out what they were doing, they murdered them.[9] When the chemical and electroshock experiments failed, the CIA relied on what was already known for more than a thousand years from secret societies.

The seemingly bizarre ritual of the theatrically staged murder induces a post-traumatic stress in the new member's brain. The theatrical staging is important, because the members will spend their remaining lives pretending to care about their country while they assist

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[6] https://www.motherjones.com/media/2015/10/book-review-devils-chessboard-david-talbot/; https://en.wikipedia.org/wiki/Allen_Dulles.

[7] https://www.cambridge.org/core/journals/psychological-medicine/article/abs/contribution-of-brain-imaging-to-the-understanding-of-psychopathy/9838ADEE28AA45347BD8EF7F40CE7E6F

[8] https://cybertorture.com/2025/04/17/full-list-of-mkultra-institutions/; https://www.nytimes.com/1977/08/04/archives/80-institutions-used-in-cia-mind-studies-admiral-turner-tells.html.

[9] https://www.theguardian.com/us-news/2019/sep/06/from-mind-control-to-murder-how-a-deadly-fall-revealed-the-cias-darkest-secrets

in their agreement to watch and assist crimes be committed against their own country, such as murder, illegal wars, etc., and remain silent. They are aided by the suppression of their moral compass and social conscience due to the murder ritual and promises of members of the secret society to assist to achieve what they could not achieve otherwise, become president.

The skull and bones initiation ritual is known to have been used on George Bush senior, George Bush junior, and John Kerry, all presidents or possible presidents.[10] The CIA under George Bush allowed planes to fly into the Twin Towers on September 11, and George Bush lied to the U.S. citizens and claimed it was Iraq. When this did not work Bush lied about Iraq possessing weapons of mass destruction, and used Tony Blair of Great Britain to tell the same lies, and started the illegal war they sought.

King Charles III of Great Britain voiced his displeasure in his speech to the U.S. congress at what Tony Blair and had done.[11] He explained Great Britain had willingly helped the U.S. in war against Afghanistan, while refusing to mention or acknowledge Iraq or what Tony Blair had done with George Bush. King Charles' silence on Iraq spoke loudly.

These Local Rule 1.05(a) violations by the FLMD judges involving the DOJ are the work of illicit psychopathic enterprises with a nexus to the CIA with a design that damages the judicial system using similar

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[10] https://www.youtube.com/watch?v=xSGYJlR2qgc; https://www.independent.co.uk/news/world/americas/us-politics/george-hw-bush-skull-bones-yale-secret-society-us-president-dubya-kerry-a8340596.html.
[11] https://www.youtube.com/watch?v=tCUZWnX8JIM; https://apnews.com/article/king-charles-iii-us-congress-speech-9ff638ae63a41289dbd9ebfbb550e40e.

tactics to the initiation rituals of the free masons, skull and bones, etc. The DOJ is pulling and inducing attorneys who have become judges to secretly work for the DOJ, in exchange for being part of bribery schemes and obtaining DOJ protection to commit crimes. The cognitive dissonance is then used to train those "attorney-judges" for the DOJ on how to engage in white-collar crimes, and the stalking, assaults, and batteries in which the Petitioner was targeted, as they are used to cover up those crimes.

C. The FLMD judge Julie Sneed used fraudulent misrepresentation of 2014 IP Agreement in her FLMD district court dismissal order, and committed white-collar crimes in the order in violation of federal criminal code 18 U.S.C. §1512 and Fl. St. §914.22 using misleading conduct.

Below is the offending statement from the district court judge Julie Sneed in the dismissal order she issued February 18, 2025, Doc. 115, pg. 3, trying to cover up the contract breaches. This Court can see that Judge Sneed's statement about the 2014 IP Agreement is false. The only rights granted by the 2014 IP Agreement are those pursuant to UCF Regulations UCF-2.029. This is Sneed's assertion (Appendix 14a):

> "Plaintiff concedes that as a condition of his employment with UCF, he executed an Intellectual Property Agreement that granted UCF title to inventions "in the field or discipline in which [he] [was] employed by [UCF]" or which were "made with the use of [UCF's] [s]upport."

Sneed adds the false statement from the Sovinski declaration, that the assignment was for any and all rights. Appendix 14a.

"This agreement also "assigne[d] to [UCF]... any and all rights in such [i]nvnentions that [we]re invented and/or conceived at any time during."

The actual facts are that the Intellectual Property Agreement, which is the 2014 IP Agreement, grants the Petitioner title to his inventions and grants UCF title to his inventions pursuant to UCF-2.029. This is very different than what Sneed has above, and Sneed omits any mention that each term of what she calls the Intellectual Property Agreement is fully pursuant to UCF-2.029 as stated in term 1 shown below.

1. I have received and review University Regulation UCF-2.029, entitled "Patents, Trademarks, and Trade Secrets." All terms in this Agreement are defined pursuant to UCF-2.029.

Sneed used surprise in her dismissal order, making an assertion that the 2014 IP Agreement is not pursuant to UCF-2.029. The defendants never made assertions in court filings despite the large number of motions to dismiss they filed over the sixteen-month proceeding.

Sneed instead used misleading conduct towards the Petitioner, intentionally omitting information from her statement and thereby intentionally concealing the material fact that Intellectual Property Agreement (2014 IP Agreement) is fully pursuant to UCF-2.029 that Sovinski and Shtrom repeatedly violated.

The district court judge used the misleading conduct that Kidd had refused to use when he refused or failed to issue a magistrate report in the fourteen months he served on the case. Sneed's intent is clear, which is to conceal the contract breach of the 2014 IP Agreement, to cause or induce others, including appellate judges, to withhold the government records from her dismissal order that are attached to the SAC.

In doing so, Sneed relied on the DOJ protection and involvement in the military bribery scheme, and committed white-collar crimes that include Fl. St. §914.22(1)(a), and 18 U.S.C. §1512(b)(2)(A),(B) in her dismissal order she issued February 18, 2025, after the stalking, assaults, and batteries failed to deter the Petitioner from pursuing the damages caused by the military organized crime scheme involving the state actors from UCF. The stalking, assaults, and batteries violate 18 U.S.C §1512, 1513 and Fl. St. §914.

Sneed acknowledged in her dismissal order that she knew the Petitioner had been stalked, assaulted, and battered during the district court proceeding. Below is true:

> (*Id.* at 39–40.) Plaintiff asserts that he is being "assault[ed]" and "intensely stalked with . . . high-power RF [(radio frequency)] directed energy transmitters and other physical endangerments." (Dkt. 41-1 at 5.) Allegedly, he has been driven from his home due to the high-power RF being "beamed

Yet Sneed took no action, and Embry Kidd struck the affidavits the Petitioner filed, and Sneed pulled the information from the affidavits that Kidd struck and used it anyway. If Sneed or Kidd thought the Petitioner was providing false information, they could have had it investigated to determine the truth. Instead, each neglected to prevent the stalking, assaults, and batteries using the military and DOJ tactics and RF technologies. In doing so they violated 42 U.S.C. §1986 pursuant to 42 U.S.C. 1985.

D. Eleventh Circuit judges refused to perform the required *de novo* appellate review to determine qualified immunity because of the contract breaches, and instead used a false assertion that acts taken "under color of any statute, ordinance, regulation, custom, or usage" of the §1983 entitles a state actor to qualified immunity.

The appellate judges refused to perform the *de novo* review to be determine qualified immunity violates all other U.S. appellate courts, including the Eleventh Circuit, including. *Horton v. Reliance Standard Life Ins. Co.*, 141 F.3d 1038, 1040 (11th Cir. 1998); *Hardigree v. Lofton,* 992 F.3d 1216, 1223 (11th Cir. 2021). Furthermore, in performing the de novo review, the Eleventh Circuit rulings require the appellate judges to accept all allegations of the complaint as true and construes the facts in the light most favorable to the plaintiff. *Harry v. Hartop,* 237 F.3d 1315 (11th Cir. 2001).

Instead, the appellate judges were focused on protecting what they had already learned from the Petitioner involving the Local Rule 1.05(a) violations, and their own appellate judges, including Embry Kidd, who had engaged in the fraud upon the court with other FLMD judges.

The appellate judges withheld the government records that proved beyond reasonable doubt that the contract breaches of the 2014 IP Agreement and perjury in the USPTO, and refused to even mention UCF-2.029 or the 2014 IP Agreement.

Instead, they used the withholding of the government records and relied on pretext that falsely asserts that the defendants are entitled to qualified immunity because Deppe had conceded the Sovinski and Shtrom were state employees who acted "under color of state law," and this entitles them to qualified immunity. The assertion by the appellate judges is shown below from the appellate opinion (underline added), Appendix 3a:

> Here, the record demonstrates that the district court properly found that Sovinski and Shtrom had acted within their discretionary authority by making USPTO filings and canceling Deppe's company's lease of UCF lab space. Deppe's complaint conceded that Sovinski and Shtrom were state employees who acted at all relevant times under color of state law. The district court properly found that Sovinski had discretionary authority to make USPTO filings and terminate Deppe's lease on UCF's behalf based on her position as deputy general counsel of research. As director of the OTT, Shtrom similarly had discretionary authority to make USPTO filings. The USPTO filings attached to Deppe's complaint verify that they asserted UCF's ownership interests in the patents and signed filings under their position's titles.

As the appellate judges and justices already know, the phrase "Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State..." is an element of a claim pursuant to the §1983, not an entitlement to breach contracts and commit perjury in the USPTO.

Because the appellate judges of the Eleventh Circuit failed to perform the *de novo* review, and withheld information and facts from government records attached to the SAC, they contravened case law set by *Aschroft v. Iqbal*, 556 U.S. 662, 741 (2009), and *Anderson v. Creighton*, 483 U.S. 635, 640 (1987), that require the judges to treat the alleged facts as true and in a light most favorable to the Plaintiff, and perform *de novo* review of the Second Amended Complaint and its exhibits for qualified immunity. The appellate judges relied on only bald assertions that acting under color of state law entitles a state actor to qualified immunity, contravening *Espanola Way Corp. v. Meyerson*, 690 F.2d 827, 830 (11^{th} Cir. 1982).

CONCLUSION AND RELIEF REQUESTED

This Petition shows that organized government crime is operating in the FLMD court system, with the FLMD judges engaged in fraud upon the court with DOJ attorneys through violations of their Local Rule 1.05(a). The Petitioner was stalked, assaulted, and battered during the district court proceeding, and then subjected to white-collar crimes by the FLMD judges.

For the reasons in this Petition, this Court should grant the petition for writ of certiorari, and obtain the additional information and input on the contract breaches by the two defendants, and hear their arguments in a fair setting. The justices can see that the two defendants are not entitled to qualified immunity because they breached all contracts, and the terms of the 2014 IP Agreement have been falsified by Sneed in her dismissal order.

The Supreme Court justices also now have organized government crime beneath them in the FLMD and Eleventh Circuit, with the FLMD judges providing their own proof with > 99.9% probability, in addition to information from Bustamante, that the FLMD judges are running a systematic scheme of fraud upon the court with the DOJ using the Local Rule 1.05(a) violations. This corruption will only increase in its damage to the U.S. if not addressed by this Court.

Respectfully submitted,

/s/ Dennis G. Deppe

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APPENDIX