

No. 26A397

In The
Supreme Court of the United States

Ryan P. Givey,
Applicant

v.

Alicia A. Givey
Respondent

APPLICATION FOR AN EMERGENCY STAY OF
THE TEMPORARY EMERGENCY CUSTODY
ORDER ISSUED BY THE CHESTER COUNTY
COURT OF COMMON PLEAS

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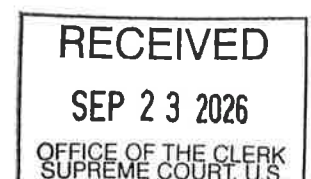


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PARTIES TO THE PROCEEDING

Petitioner

Ryan P. Givey, Applicant

Respondent

Alicia A. Givey, Respondent

RELATED PROCEEDINGS

United States Supreme Court:

Givey v Jennifer Arbiter Williams and the
Department of Justice, Case 23-7063,
Certiorari denied

Givey v Givey, Case 25-6035, Certiorari denied,
Rehearing Denied

In Re Ryan P. Givey, Case 25-6881,
Prohibition Denied, Rehearing Denied

Givey v Todd Blanche, Case 26-153

Chester County Court of Common Pleas:

Ryan P. Givey v Alicia A. Givey, No. 2015-
06444-CU (Jan. 3, 2025)

Ryan P. Givey v Alicia A. Givey, No. 2015-
06444-CU (May 15, 2025)

Superior Court of Pennsylvania:

Ryan P. Givey v Alicia A. Givey, No. 153 EDA 2025 (case remanded, application to strike denied, appellant's petition to appear remotely at oral argument denied) (Apr. 25, 2025)

Ryan P. Givey v Alicia A. Givey, No. 1318 EDA 2025 (appeal quashed, application to strike dismissed) (Jun. 23, 2025)

Ryan P. Givey v Alicia A. Givey, No. 347 EDA 2026 (appeal quashed, application to proceed pro se dismissed) (Mar. 6, 2026)

Supreme Court of Pennsylvania:

R.P.G. v A.A.G., No. 362 MAL 2025 (petition for allowance of appeal denied) (Aug. 19, 2025)

R.P.G. v A.A.G., No. 362 MAL 2025 (request for reconsideration denied) (Sep. 10, 2025)

Ryan P. Givey v Alicia A. Givey, No. 163 MAL 2025 (petition for allowance of appeal denied) (May 11, 2026)

Ryan P. Givey v Alicia A. Givey, No. 163 MAL
2025 (request for reconsideration denied) (Jul.
29, 2026)

To the Honorable Samuel Alito, as Circuit Justice for the United States Court of Appeals for the Third Circuit, including Appeals from the Pennsylvania Supreme Court for Case No. 163 MAL 2026:

Pursuant to Rule 23 of this Court and the All Writs Act, 28 U.S.C. 1651, Applicant Ryan Givey respectfully requests that this Court issue an emergency stay of the temporary emergency custody orders, issued by the Chester County Court of Common Pleas in case *Ryan P. Givey v Alicia A. Givey*, No. 2015- 06444-CU entered on Jan. 3, 2025 and May 15, 2025, pending appeal to the Supreme Court of the United States and pending appeal of any further proceedings in this case, until a full custody hearing is held and formal custody order of the court can be entered in this case. Applicant respectfully requests an immediate stay of the temporary emergency custody orders to prevent ongoing irreparable injury, while his appeal is pending. Applicant's application for emergency relief before the Pennsylvania Supreme Court was denied and appears at APPENDIX A. The emergency custody orders in question appear at APPENDIX B and APPENDIX C.

STATEMENT OF THE CASE

HISTORY OF THIS CASE

***The events are presented to the best of Applicant's recollection and belief and all parties named and unnamed should be presumed innocent.**

A custody case was filed against Applicant on 12/11/24 that was appealed to the US Supreme Court that Applicant believes was brought to interfere with Applicant's criminal complaints currently pending before the US Supreme Court case no. 25-153.

After Trump won the election in November 2024 Applicant stated he will be refiling his federal lawsuits demanding the DOJ take a criminal complaint.

On 12/11/24, Applicant had a lawsuit before the Pennsylvania Supreme Court requesting the Pennsylvania Attorney General take a criminal complaint, after his lawsuit was illegally dismissed, in an anonymous, per curiam order by the Pennsylvania Commonwealth Court, that was illegally entered into the court's filing system without a signature by the prothonotary, stating the Attorney General did not even have to respond to his lawsuit.

On 12/11/24, at 3:50 pm RESPONDENT filed a petition requesting emergency custody of their children. RESPONDENT was denied emergency custody at that time and requested a two-hour emergency hearing that was scheduled before Judge Sondergaard.

Between 3:50-4:30 pm on 12/11/24 the Court improperly transferred the case to Judge Royer and rescheduled the case for a full day hearing. (See US Supreme Court case 25-6881).

A typical emergency custody hearing lasts 30-60 minutes. Applicant was advised by the Court that it would be a federal crime for a litigant to choose their judge or switch a judge, in order to influence the conditions or outcome of a hearing.

So, on 12/11/24 RESPONDENT filed an emergency custody petition and was denied, then the court staff improperly transferred judges, illegally changed the hearing from a two-hour hearing to a full day hearing and rescheduled the hearing from 1/28/25 to 1/3/25, before Trump took office.

Applicant was threatened before the hearing on 1/3/25 that if he did not commit perjury and testify that he is mentally ill and no longer believes in the criminal allegations then he would never see his children again, then when he refused his children were illegally removed from his custody.

On 1/3/25 Judge Royer failed to disclose her relationship with the former District Attorney who endorsed her campaign for Judge and that her husband, as a former West Chester Borough Council member, created and supervised the rental inspection scheme that was used to illegally target Applicant's rental properties and Applicant presented evidence of misconduct by the District Attorney and West Chester Borough (See US Supreme Court case 25-6035, Petition for Rehearing, p.16-22).

On 1/3/26 RESPONDENT testified the "sole" reason she filed for emergency custody was because Applicant filed a court case demanding law enforcement take a criminal complaint and provide witness protection. (153 EDA 2025, Transcript p.37 Line 13-18) (Givey v DOJ, Case No. 23-7063).

On 1/3/25, RESPONDENT testified that Applicant had never harmed their children but made an outrageous claim that Applicant could potentially have a psychotic break and claimed the only time Applicant had a psychotic break was in 2014, while Applicant claims he was illegally drugged and Applicant believes that the evidence suggests that RESPONDENT had tampered with his food that day to illegally drug him.

In 2014, after Applicant was drugged, resulting in a car accident, RESPONDENT deceived Applicant's family preventing Applicant's family from getting him at the

hospital, during which time RESPONDENT requested Applicant be mentally evaluated, leading to Applicant being forced into a mental health facility without a hearing, in violation of the law, and Applicant was instantly told he was mentally ill, which was done by an unidentified doctor contrary to the DSM, which is the required criteria in the US to diagnose mental health conditions.

Judge Royer stated “There have been no reports or evidence of any violence or assaultive behavior by either of these parties towards each other or the Children.” (153 EDA 2025, Opinion Sur rule 1925(a), p.56).

Judge Royer gave a presentation on April 19, 2022 (APPENDIX D) on her expectations for Emergency Petitions for Special Relief, the notes available from meeting state that a plaintiff must prove “clear and present danger”, with “clear evidence of harm”. “To successfully secure an order, the petition must clearly show an immediate risk to the child's physical or mental well-being. Key elements include clear-cut evidence of active abuse, criminal charges, or an illegal attempt to relocate the child.” (APPENDIX E).

The trial court only has emergency jurisdiction under Title 23 Pa Code § 5424 to issue an emergency custody order if the children were abused or mistreated. A court needs proof, such as police, Child Protective Services or hospital reports that the children have been harmed. The potential that the children could possibly be harmed is not enough to grant the court emergency jurisdiction.

Judge Royer stated that she read Applicant’s allegations of misconduct against Tom Hogan’s District Attorney’s office and West Chester Borough and

RESPONDENT read aloud Applicant's allegations during direct testimony (Transcripts, Jan. 3, 2025, p.3; p.26-27).

Contrary to the evidence presented, Judge Royer called Applicant's allegations of misconduct, a "delusion" and a "conspiracy theory" and contrary to Judge Royer's own stated requirements to secure an emergency petition for special relief, stated on April 19, 2022, Judge Royer suspended Applicant's custody rights and ordered Applicant to undergo a psychological evaluation with a doctor chosen by RESPONDENT.

Judge Royer ordered Applicant to provide the doctor, chosen by RESPONDENT to perform the evaluation, copies of Exhibits M-3 and M-4 (his lawsuit, US Supreme Court, Givey v DOJ, 23-7063) to assess Applicant's allegations of misconduct concerning the District Attorney's office and West Chester Borough.

Judge Royer stated she wishes to make the forced psychological evaluation public, stating an "independent medical examiner will not be subject to the confidentiality requirements of 42 Pa C.S. § 5944 because he will have no treatment relationship with Father." (153 EDA 2025, Opinion Sur Rule 1925(a), p.51).

RESPONDENT and Judge Royer were unable to cite any precedent in any court to support the order to force Applicant against his will to undergo a psychological evaluation, which would clearly be a violation of Fourteenth Amendment's protections against unwarranted and forced mental health evaluations.

On January 9, 2025, a false criminal complaint was filed against Applicant and he was detained at the courthouse, as he attempted to deliver his Notice of Appeal, and Applicant was criminally investigated by the sheriff's department. On January

13, 2025 Judge Royer's law clerk emailed Applicant's attorney prompting Applicant's attorney to demand Applicant file a pro se agreement (See US Supreme Court case no. 25-6881, p.23; p.32).

Applicant's 15 year-old son stated that RESPONDENT told him, "Your father wanted to enter the witness protection program and take you away from me, so I took you away from him."; and he stated that when he asks his mother why she removed his father's custody, she repeatedly told him it is because Applicant requested to be in the witness protection program, telling him "Your father needs to stop asking to be in the witness protection program."

Judge Royer quoted RESPONDENT's attorney questioning Applicant in her opinion:

"Q. Did you advise your children of why she filed, what the underlying reasons were?

A. To my recollection, I think I said that she was for, what is it, I think that she was asking to have the custody changed.

Q. Did you happen to mention to them that you were trying to get into the witness protection program?" (p. 36)

Judge Royer wrote as her rationale for entering the 1/3/26 emergency custody order: "Defendant was advancing a complex and wide-ranging conspiracy theory in the State and Federal Courts specifically requesting, without Mother's knowledge or consent, that he and his children be admitted to the Federal Witness Protection Program, an outcome which would surely have had some detrimental effect of

Mother's ability to maintain a relationship with the Children"(p.46). "If Father's allegations are true the Children are not safe with him."(p.47)

Then Judge Royer cited statute 23 Pa C.S. § 5424 which states that emergency jurisdiction is only conferred if the children have been subjected to "mistreatment or abuse", further stating "Father is attempting to obtain admission into the Federal Witness Protection Program for himself and his children. Father's filings in the Federal Courts indicate that he has been poisoned, his home burglarized, his family and friends also poisoned and threatened, and himself constantly surveilled by government agents. If Father's allegations are true, Father has been subjected to or threatened with mistreatment and abuse within the meaning of 23 Pa C.S. § 5424, thus giving the court emergency jurisdiction to enter a custody order to protect the Children."(p.48). "Father's attempts to obtain admittance into the program for himself and the parties Children, if successful, would have a significant impact on the Children's well-being. It would completely alter their day-to-day lives, impair their ability to maintain their current relationships in the community, and place a significant barrier to their ability to maintain a normal relationship with Mother."(p.48).

"Father's unjustified actions in surreptitiously seeking admittance to the Federal Witness Protection Program for himself and his Children threatens and/or subjects the Children to maltreatment and abuse."(p.49) (153 EDA 2025, Opinion Sur rule 1925 (a)).

None of the evidence cited by Judge Royer meets her own stated requirements to prove “clear and present danger”, with “clear evidence of harm”. “To successfully secure an order, the petition must clearly show an immediate risk to the child's physical or mental well-being. Key elements include clear-cut evidence of active abuse, criminal charges, or an illegal attempt to relocate the child.”

Pursuant 23 Pa C.S. § 5424, there must be evidence the children are in imminent danger of physical harm, not the potential of psychological harm due to a hypothetical situation that never occurred. “(Philadelphia Entertainment and Development Partners, L.P v. City of Philadelphia, 937 A.2d 385 (Pa. 2007))(courts should not give answers to academic questions or render advisory opinions or make decisions based on assertions as to hypothetical events that might occur in the future)”. (Opinion Sur Rule 1925a p.5).

Judge Sondergaard presided over the pretrial hearing in July 2025. Then the custody case was assigned back to Judge Royer.

After Applicant alleged that Judge Royer was improperly assigned, she lacked jurisdiction and violated his rights, the Court again improperly switched the judges in this custody case, this time to Judge Cauley, without explanation. Judge Cauley is an expert in mental health litigation and Applicant finds it very unlikely he was randomly assigned.

While this custody case was on appeal before the US Supreme Court (25-6035) the Court scheduled the full custody hearing, with RESPONDENT requesting the court

to permanently remove Applicant's custody rights and the Court has repeatedly ignored Applicant's teenage children's requests to restore his custody rights.

Applicant requested to attend the custody hearing remotely and Judge Cauley denied that request giving rise to this present petition.

CURRENT ISSUE PENDING

On December 15, 2025 Judge Royer, who authored the Jan. 3, 2025 and May 15, 2025 emergency custody orders, received a Writ of Prohibition that Applicant filed with the United States Supreme Court, alleging that Judge Royer had a conflict in interest, was improperly assigned this custody case, lacked jurisdiction, that she exceeded her authority and violated Applicant's rights. The Writ of Prohibition was rejected by the US Supreme Court based on a defect in the filing on Dec. 30, 2025.

On December 30, 2025 Applicant received an email from the secretary of a lawyer who no longer represents Applicant informing him of a scheduled hearing on Feb. 2, 2026 (APPENDIX F) before Judge Cauley and Applicant was told that Judge Cauley would be presiding over a newly scheduled full custody hearing on March 9-10, 2026, while Applicant's Petition for Writ of Certiorari was still pending before the United States Supreme Court. Since the judges had been switched Applicant could not refile his Writ of Prohibition concerning Judge Royer.

The letter was dated December 12, 2025, three days before Judge Royer received Applicant's Writ of Prohibition and did not explain why the Chester County Court, once again, improperly switched the judges in this custody case. Switching the judge to Judge Cauley violated Chester County Court Local Rules of Civil Procedure 200 A,

that requires “when the case is commenced it shall be assigned for trial and pre-trial proceedings to a designated judge. The designated judge shall be responsible for the matter from the time of the initial filing until final disposition.”

Applicant believes the more likely scenario is that after receiving the Writ of Prohibition on Dec. 15, 2025, the Chester County Court realized the legal liability and potential criminal liability of this case. In response to the Writ of Prohibition the Chester County Court decided again to improperly switched the judges, to specifically select their judge, who is an expert in mental health litigation, to get involved with this case. Then they backdated a letter to Dec. 12, 2025 in an effort to make it appear the switching of judges was unrelated to the Writ of Prohibition served on Judge Royer, which would explain the reason that Applicant was not made aware of the letter until Dec. 30, 2025.

The Chester County Court scheduled a custody hearing in March 2026, while this custody case was on appeal before the US Supreme Court (25-6035). Applicant requested to appear remotely for the hearing and Judge Cauley denied that request on 1/20/26 leading to the current petition that was recently decided by Pennsylvania Supreme Court. Title II of ADA prohibits discrimination in state and local government services on the basis of a disability. (See *Mathews v Jefferson*, 29 F. Supp. 2d 525 (W.D. Ark. 1998)).

Twice before, the Court had granted Applicant the right to appear remotely for hearings in his custody case (Judge Royer on 4/7/25 and a Hearing Officer on 5/21/25). Judge Cauley wishes to relitigate an issue that has already been decided by the court,

that Applicant is a qualified person under ADA and entitled to the reasonable accommodation of a remote appearance.

Chester County Court does not permit audio or video recording of their hearings and Judge Royer stated at the emergency custody hearing on 1/3/25 immediately before Applicant testified “Mr. Givey, there is no recording that can take place in the courtroom”(Transcripts p.55, 1/3/25). Applicant has noted that a transcript was illegally altered in a prior hearing he attended within the Chester County Court.

At the hearing on 5/21/25 RESPONDENT’s lawyer, without any evidence, accused Applicant of recording the hearing, leading the hearing officer to threaten to have Applicant criminally investigated by the Sheriff’s office.

On 1/9/25 Applicant entered the Chester County Courthouse and was detained by court security on false allegations, criminally investigated by the Sheriff’s office, which they later claimed was a misunderstanding (See US Supreme Court case 25-6881).

Due to the tangible threats to Applicant’s liberty due to false allegations made against him at the courthouse and the stress and anxiety this caused, Applicant presented Judge Cauley with a doctor’s note from a treating psychologist requesting a reasonable accommodation, to appear remotely, for the hearings in this custody matter. Judge Cauley denied that request on 1/20/26.

On 1/29/26 Applicant entered the West Chester, Pennsylvania Post Office to mail his Notice of Appeal to Judge Cauley and Opposing Counsel, both of which are located a few blocks from the Post Office.

The Post Office Clerk put the incorrect address for the Courthouse into the electronic kiosk for Applicant to verify the address. Applicant requested that she correct the address and the Clerk refused, claiming that the address Applicant had on his package was incorrect.

Applicant called Phyllis Bronson from the Chester County Prothonotary Office and put his phone on speaker and the mail clerk repeatedly insisted the address was incorrect, while Bronson repeatedly told her that the address was correct and she receives mail every day at the Courthouse at that address. The mail Clerk refused to process Applicant's mail. Another clerk at the West Chester Post Office processed Applicant's mail.

The mail should have been delivered that same day to the locations a few blocks from the Post Office. The certified mail tracking shows that the mail to Opposing Counsel was not delivered (APPENDIX G) and Judge Cauley's mail (APPENDIX H) claims it was collected from a Post Office in a different town, 22 miles away, at 6:37 AM on 2/10/26 (12 days later), hours before the Post Office opens at 9:00 AM. Applicant hired a process server to timely deliver his Notices of Appeal on 2/11/26.

Applicant's Notice of Appeal stated the "errors complained of" from the 1/20/26 order, so Applicant was not required to file a separate Concise Statement of Errors.

Judge Cauley issued an order dated 2/4/26 requesting Applicant to submit a concise statement of errors “within 10 days of the date of his order” (APPENDIX I) and stated “upon consideration of Plaintiff’s Notice of Appeal filed on January 29, 2026”.

The stamp on the order states that it was “SENT” on 2/10/26 and the prothonotary stamped it on 2/6/26. Judge Cauley ordered Applicant to send the mail to a post office box, contrary to PaR.A.P. 1925(b)(1) which requires service through certified mail.

It is unclear how Judge Cauley’s order could have been written on 2/4/26 because Applicant’s Notice of Appeal, according to the mail tracking, shows it was collected from the Post Office on 2/10/26 and Applicant had the process server deliver the Notice of Appeal on 2/11/26. Applicant believes there is evidence that his court mail has been illegally interfered with and court staff have altered the timestamps on the order to interfere with his appeal.

It is also worth noting that Chester County Court requires original ink signatures on all documents submitted, which makes court filings incredibly difficult considering Applicant’s court mail has been repeatedly interfered with, Applicant is not comfortable entering the courthouse after false criminal allegations were made against him, the judges and court staff refuse to intervene when they are fully aware Applicant’s court mail is being interfered with and Applicant is required to hire a process server from Philadelphia to come all the way to West Chester to deliver all his court filings.

It is unclear who Judge Cauley sent his 2/4/26 order to. The Chester County Court has listed two lawyers as representing Applicant. The Court refuses to remove a lawyer, who no longer represents Applicant and the Court sometimes sends mail to his current lawyer and sometimes sends mail to a lawyer who no longer represents Applicant.

This appeal was filed pro se and Applicant received a copy of the order, mailed from the Court, that was time stamped as being sent on 3/2/26.

Applicant was made aware of the 2/4/26 order on 2/16/26 and responded the next day on 2/17/26. On 2/27/26 Judge Cauley's PaR.A.P. 1925(b)(2)(i) opinion claimed Applicant's response was untimely and should be dismissed.

However, PaR.A.P. 1925(b)(2)(i) states "The judge shall allow the appellant at least 21 days from the date of the order's entry on the docket for the filing and service of the Statement." Judge Cauley's order was not entered into the Pa Superior Court docket until March 2, 2026.

Judge Cauley also stated "this Court cannot determine whether Appellant qualifies for relief under ADA".

By 2/2/26, Applicant had the custody of children removed for 13 months and at the pre-trial hearing, held that day, Judge Cauley could have restored Applicant's custody rights and he chose not to do so.

Applicant has maintained that he is not mentally ill but suffers from severe stress and anxiety and is entitled to a reasonable accommodation requested by a treating doctor under ADA.

The court has already decided Applicant is a qualified person on those grounds and therefore this Court should agree with the consensus of the prior court decisions on this matter and find Applicant is entitled to the requested relief of a remote appearance for any future hearings on this custody matter.

The Pa Superior Court has issued three anonymous orders, in this appeal, which violated our laws and are not signed by the prothonotary, where the Pa Superior Court assigned a lawyer as representing Applicant who was not representing Applicant, then issued a Sua Sponte show cause order, illegally dismissed a motion to proceed pro se, issued an order to reject all of Applicant's filings and then dismissed his appeal, falsely claiming he did not respond (See US Supreme Court case 25-6881, Petition for Rehearing, p.9 & Appendix B, C, D). The Pa Supreme Court denied Applicant's petition for allowance of appeal and petition for special relief. The Pa Supreme Court also denied Applicant's petition for rehearing.

Applicant is currently working on his Petition for Writ of Certiorari for this case detailing several extraordinary Due Process violations within the local court and his state appeal.

**EVIDENCE OF A CONFLICT OF INTEREST BY JUDGE ROYER WHO
ISSUED THE EMERGENCY CUSTODY ORDERS FOR WHICH APPLICANT
IS REQUESTING AN EMERGENCY STAY**

1. Judge Allison Bell Royer comes from one of the most powerful political families in Pennsylvania. Judge Royer's grandfather Clarence D. Bell, served in Pennsylvania's Senate and House from 1954-2002.

Judge Royer's husband, Shannon Royer, is a local and state politician, he had served as Chief of Staff for Pa Senator Tom Killion and as a former West Chester Borough Council member, was personally involved with the creation and supervision of the West Chester Borough's rental inspection program, that was later used to target Applicant's rental property business. The same people Shannon Royer worked with and publicly praised during Borough Council meetings, were still employed at the Borough and their names appear in the evidence of misconduct reviewed by Judge Royer at the emergency custody hearing on 1/3/25.

See the attached document from the Director of Building and Housing, addressed to Shannon Royer (APPENDIX J) stating that in 1999, the Borough had 3,932 rental units and only inspected 1,118 rental units that year, in 1998 the Borough inspected 2,511 units and issued 4,023 violations to 496 units, resulting in 200 citations. By 2012, the Borough was making \$1 million a year on nuisance violations, with a 95% conviction rate, before the two local district judges, including Judge Knapp (Who will become relevant later).

The Director of Building and Housing, who sent that letter to Shannon Royer is the same man who approved the code violations that targeted Applicant's rental properties, threatened to obtain search warrants to enforce the Borough's unlawful

rental inspection scheme and his name and others appears in the evidence reviewed by Judge Royer at the emergency custody hearing on 1/3/25.

A lawsuit was initiated, during Shannon Royer's tenure on Borough Council, over the Borough's rental inspection program, alleging the rental license fee was an "unlawful tax" and that the Borough targeted specific properties and landlords for enforcement, by inspecting the same properties every year, while not ever conducting rental inspections of other half of the properties in the Borough (*Kappe v. West Chester Borough*, No. 1905 C.D. 2003 (Pa. Commw. Ct. May 11, 2004)).

By 2005, when Applicant purchased two apartment buildings, the Borough claimed they had a yearly rental inspection program, they inspected his property every year and between 2005-2010 and Applicant had never received any code violations.

Between 2010-2012, Applicant had received many fabricated violations and citations (none of which were substantiated in court) and discovered the court filings in **Kappe**, where the Borough argued that they do not inspect every rental property, every year (the stamped copies of the court filings were stolen from Applicant's house).

In response to an inspection letter sent in November 2012, Applicant requested the Borough perform a limited inspection, as required by the Fourth Amendment and the Director of Building and Housing (the same person who reported to Shannon Royer that the Borough only inspects 30-60% of rental properties per year) stated that he will limit the scope of the inspection to Chapter 66 of the Borough Code

(APPENDIX K), which adopted the International Property Maintenance Code, consisting of 8 chapters with 50 subchapters, he also threatened to obtain search warrants and deny Applicant a rental license. He wished to personally perform the rental inspection and refused to limit the scope of the inspection (APPENDIX L)

It is significant that the director wished to personally perform the inspection because, the previous year, the code enforcement officer inappropriately cited Applicant with building codes for new construction, that do not apply to existing buildings, and the officer was not properly certified from the state to enforce those building codes. The director did hold proper certifications from the state to enforce those building codes.

When Applicant argued about the scope of the inspection and questioned the frequency of the inspections, the Director claimed the frequency is “determined in accordance with the schedule adopted by the Department”. “My department has adopted a schedule whereby the dwelling units which are rented are inspected on an annual basis.”

Applicant hired the attorney that had represented **Kappe**, that he discovered through court filings, since the bar association would hang up on him and refused to recommend a lawyer.

The lawyer called the Director of Building and Housing, who insisted Applicant submit to the rental inspection in February, 2013. The lawyer then visited the Director, at his office, asked to see the rental inspection schedule and demanded proof that the Borough was inspecting every property, every year.

The lawyer claimed the Director said he would double check the schedule to see if Applicant's property was scheduled to be inspected this year and get back to him (The Borough did not contact Applicant until a year and 4 months later). The lawyer also claimed the Borough stated that they do not keep records of compliant inspections and only create a record when a violation is written, so there is no evidence to prove a property has actually been inspected.

In May 2013, Applicant was contacted by a tenant, who moved into one of his apartments in August 2013.

Applicant was rarely contacted by his tenants over the past 8 years for repairs and had never before had a tenant threaten to call code enforcement. Applicant's new tenant emailed him 30 times that year, with constant requests, almost weekly, for Applicant to perform a list of repairs or maintenance projects and frequently threatened to call Borough code inspectors, to inspect the property.

She would break things like antique door handles requiring Applicant to spend days searching antique shops for a replacement, she demanded Applicant replace all the windows, at a cost of thousands of dollars, because she claimed they were drafty. She demanded to renew her lease the following year and Applicant felt obligated, due to comments she made, fearing she would claim racial discrimination, if her lease was not renewed.

In July 2014, the Borough sent Applicant a letter requesting Applicant to schedule a rental inspection. A different tenant, who did frequent contract work for a friend of the director, and who had lived in Applicant's other apartment building,

without incident, for about 3 years called at this time, complaining that he had ants and immediately threatened to call the Borough code inspectors.

So, in February 2013, the Borough faced a tangible threat of a lawsuit, due to its rental inspection program and Applicant had evidence they were targeting specific properties with code enforcement, which they have been sued over in the past.

Then magically convenient for the Borough, a tenant moves into Applicant's property, that solves all of the Borough's problems, making outrageous claims of code violations and threatening to call the code inspectors, which compels Applicant to comply with the Borough's rental inspection program by July 2014.

The Borough did not provide a landlord with a record of a compliant inspection so there is no real proof that the Borough is conducting inspections; local, state and federal law enforcement refuse to take a criminal complaint, so there are no records of any criminal complaints against the Borough; the bar association has hung up repeatedly on Applicant, making it difficult to connect to a lawyer to obtain legal help; and the Borough is able to alter court transcripts to mitigate any liability.

So, Judge Royer's husband, as a West Chester Borough Council member, created a rental inspection program, that was sued, accusing the Borough of targeting specific landlords for code enforcement.

Applicant files a lawsuit demanding that law enforcement take a criminal complaint including, concerning the Borough's Code Enforcement scheme and Judge Royer called Applicant's allegations a "delusion" and "conspiracy theory", Judge Royer removes Applicant's custody of his children (contrary to her own statements on

issuing emergency custody orders) and orders Applicant to undergo a psychological evaluation to assess his allegations and she wants to make the psychological evaluation public.

If Judge Royer's husband, as a Borough Council member, created the rental inspection program and the Borough has been using the rental inspection program to target specific landlords for code enforcement, which is the long-running allegation made in court filings, then Judge Royer's husband and his friends, could potentially be subject to legal liability.

Judge Royer ignored ongoing crimes being committed against Applicant to interfere with the court case before her, in violation of the judicial code of conduct. It is worth noting that if Judge Royer initiates a criminal investigation into Applicant's allegations, her husband could potentially be implicated.

Applicant believes that Judge Royer was illegally assigned to his custody case and the emergency orders issued by Judge Royer were the product of extraordinary fraud on the court, in violation of Applicant's due process rights under the Fourteenth Amendment of the United States Constitution.

2. Judge Royer works for the Chester County Court of Common Pleas and her campaign for judge was endorsed by Tom Hogan's District Attorney office.

Judge Royer reviewed an email on 1/3/25 that proved that a Chester County Detective had requested a detective to be assigned to Applicant's case, to investigate Applicant's allegations concerning the Borough's code enforcement scheme. In the

email, Tom Hogan's Chief of Staff intervened, refused to assign a detective, refused to speak with Applicant or review any evidence. Contrary to the evidence presented, Judge Royer called Applicant's allegations a "delusion" and "conspiracy theory".

If the district attorney was illegally blocking victims from making a criminal complaint, this would create a legal liability for her employer, Chester County and implicate her political ally Tom Hogan.

3. Applicant attended University 1's doctoral program from 2001-2014. Applicant was a teacher at School District 1 in 2003. Around this time a politically connected Administrator 1 was hired, who claimed to be personal friends with the Pennsylvania Secretary of Education.

Administrator 1 was also friends with several of Applicant's professors at University 1's doctoral program. University 1 is a politically connected University who employed Joseph Biden as a professor for many years and houses the largest law school in the area. Judge Royer and RESPONDENT's attorney, Cheryl McCallin both attended University 1, at the same time and graduated from University 1's law school.

Administrator 1 hired several of her friends as teachers, who were not certified with proper teaching certificates, while hundreds of certified teachers were applying for every district teaching position. Applicant became embroiled in a professional dispute with one of Administrator 1's friends and following a complaint to Human

Resources, the school board eliminated the positions of Administrator 1 and her friend.

Applicant, stated in court documents reviewed by Judge Royer on 1/3/25, and believes, that Administrator 1, after being fired, reached out to her friends at University 1 and a network of graduates from University 1 have been used to attack him.

Around 2005, when Applicant had the employment dispute with Administrator 1, her friend, who was Applicant's professor at University 1 began telling a story the final day of every class. He told the story many times and would stare at Applicant as he told it, saying that there was a guy who was so horrible and terrible that all of friends turned against him and all of his family turned him against, so he had no one. He said to picture it as if the man were holding a balloon and it was sinking, the man was reaching out to his friends and family begging for someone to help him, as he lost his job, his wife divorced him, criminal charges were brought against him and it was as if his family and friends had pins and stabbed the balloon to watch him sink faster.

This is the same threat stated on video by U.S. Representative Brandon Williams in November 2023, "You fuck with my family, I will end every relationship you have. Every single friend. Do you understand me?"

Within a few years, all of Applicant's friends and family were being threatened and within about eleven years Applicant's wife divorced him, he had to sell all his rental properties, his employer was trying to fire him, he was illegally thrown into a

mental facility and there were repeated attempts to frame Applicant for crimes he did not commit.

In 2013, Applicant believed his progression in University 1's doctoral program was being arbitrarily interfered with and he changed dissertation advisors.

After being held back in the program for six years, Applicant was then scheduled to defend his dissertation proposal a few months later.

On, Nov. 8, 2013, Applicant received an email confirming he passed his dissertation proposal defense.

About a week later, Applicant's dissertation committee requested he drastically change his dissertation proposal, that was already approved, from a qualitative research study to a mixed-methods study, demanding he still complete his qualitative research and, in addition, also collect data from a survey they provided, do a quantitative analysis of that data, as well as add to the literature review chapter, to incorporate relevant research pertaining to the survey and quantitative analysis.

Applicant never agreed to these changes and filed a grievance with University in December 2013.

In February 2014, Applicant met with the university department head, who made him an offer to attend the university for free to complete his degree, which Applicant declined at that time, and threatened to sue the university.

On Feb. 12, 2014, a principal (who graduated from University 1), scheduled Applicant to work in his school computer lab. The windows had been left open all night and the school refused to turn off the air conditioner, requiring Applicant to

work 7 hours in freezing temperatures, without a winter jacket. Applicant's food that he ate for lunch that day was tampered with drugs and Applicant was followed home from work resulting in a car accident.

RESPONDENT deceived Applicant's sister, preventing her from getting Applicant from the hospital and RESPONDENT requested to have Applicant mentally evaluated, leading Applicant to be forced into a mental facility that night, without a hearing or judicial review, in violation of the law, and 8:00 am the following morning, Applicant was told he was mentally ill, by an unidentified doctor, contrary to the required criteria to diagnose mental illness, without speaking to Applicant, giving him any assessment, observing him or reviewing his mental health history and at that time Applicant had no mental health history.

Around the same time, Applicant's two best friends were also declared mentally ill. (See US Supreme Court case, 26-153 p.33-34). (See also Weir v University of Pittsburg; W.D. Pa 21-1206 (2022)) Weir, an African American doctoral student at the University of Pittsburg, accused the university of discrimination, then claimed he was being followed, stalked and harassed. Weir claimed he was forced to meet with a university psychiatrist after being threatened with termination from the doctoral program. Weir claimed the psychiatrist diagnosed him as psychotic with "no basis", after which Weir was terminated from the program. Weir's case was dismissed without a hearing.)

Applicant was released from the mental facility, nine days later, and later accepted University 1's offer to attend the school for free and complete his degree,

with Applicant graduating in December 2014. (Applicant's home has been broken into and his doctoral diploma and university transcripts have been stolen from his home. Applicant does have his dissertation with signatures of the dissertation committee, proving he did in fact graduate with his doctorate degree.)

When Applicant returned to work, the department head (who graduated from University 1) hired her friend's daughter to be Applicant's supervisor, and she immediately began attacking Applicant professionally and Applicant was later fired from his job.

So, the facts are: In February 2014 Applicant threatened to sue University 1 and, in an incredible stroke of luck for the university, days later Applicant found himself illegally drugged, followed on his way home from work, illegally forced into a mental facility, fraudulently declared mentally ill and his career threatened (by a graduate of University 1) leading Applicant to abandon the threatened lawsuit against the University and accept their offer to attend the university for free, where Applicant graduated with his doctorate degree in December 2014, after having his former dissertation committee argue that Applicant's same dissertation was "weak" and inadequate through the grievance process in February 2014.

If Judge Royer is connected to a network of graduates from University 1 attacking Applicant, she would have a motive to interfere with his criminal complaints.

Applicant believes that there is a connection between what happen to him at University 1 and the code enforcement actions taken against his rental property

business and Applicant believes it is worth noting that Judge Royer has a direct connection to both University 1 and the exact same West Chester Borough employees involved with the code enforcement scheme against Applicant.

4. Judge Sullivan is the Pa Superior Court judge who authored the opinion in appeal 153 EDA 2025, she remanded the case back to Judge Royer on the psychologist/psychiatrist patient privilege claim (that Judge Royer did not obey), she denied Applicant's application to strike the false statements RESPONDENT made to the court and illegally dismissed Applicant's claims on jurisdiction, compliance with TITLE 231 Pa. CODE RULE 1915.8 and Fourteenth Amendment claims (See US Supreme Court case 25-6035).

Judge Sullivan's judicial chambers are located a few blocks from the Chester County Courthouse and RESPONDENT's lawyers' law offices. Judge Sullivan worked for the Chester County District Attorney's office from 2002-2012 and from the Pennsylvania Attorney General's office from 2017-2021, years during which Applicant was illegally blocked from making a criminal complaint. A google search returns that Judge Sullivan , Judge Royer and Cheryl McCallin are all active in several of the same legal associations and very likely have known each other for decades.

So, the judge on this case, in the Chester County Courthouse, was switched to Judge Royer, who issued an order that does not comply the law and she fails to take

action when Applicant presents evidence that witnesses have been threatened and harmed.

If Judge Royer knew her order was illegal, she would have a motive to interfere with Applicant's appeal; for example: filing a false criminal complaint to create false evidence to justify her order (a false criminal complaint was filed against Applicant on January 9, 2025 at the courthouse); interfere with legal representation (Judge Royer's law clerk interfered with Applicant's legal representation on January 13, 2025); or interfere with Applicant's appeal (which was conveniently assigned to Judge Sullivan).

Applicant would like it to be investigated to determine if Judge Royer was involved in any misconduct with this case but Judge Royer already knows that Applicant has been blocked from even speaking to law enforcement for many years, the DOJ stated they will not review any evidence of any crimes committed against Applicant and they will not take a criminal complaint, so there will be no record anything ever happened.

So, in an amazing stroke of luck for Judge Royer, her illegal order is assigned, on appeal, to Pa Superior Court Judge Sullivan, who Judge Royer likely has known for decades, whose office is close by (due to proximity, they could potentially meet and coordinate, without there being any phone or email records) and the Chester County district attorney office and Pa Attorney General's office who Judge Sullivan previously worked for is directly implicated in Applicant's complaints.

Judge Sullivan also issues an illegal order that violates our laws and also ignores evidence of federal crimes committed against Applicant, in violation of the judicial code of conduct, with Applicant noting that if she initiates a criminal investigation, it could potentially implicate her own conduct.

If Judge Sullivan was involved with the misconduct at the Chester County District Attorney's office or Pa Attorney General's office, she would have a motive to interfere with Applicant's appeal and interfere with Applicant making a criminal complaint.

The other Pa Superior Court Judges involved with Applicant's initial appeal were Judge Stabile (who also previously worked for the Pa Attorney General's office) and Judge Dubow (a powerful judge who is appointed to the judicial conduct board. Applicant's complaint to the judicial conduct board, that would directly implicate Judge Dubow's own ruling, was dismissed without speaking to Applicant or reviewing the evidence).

After Applicant's first appeal to the Pa Superior Court, every subsequent filing with the Pa Superior Court was illegally dismissed (See US Supreme Court case 25-6881, Writ of Prohibition and Petition for Rehearing), in anonymous orders that were illegally entered into the court filing system without a signature of the prothonotary.

Applicant believes the panel of Judges were illegally assigned to his appeal before the Pa Superior and the opinion authored by Judge Sullivan and subsequent appeals, that were dismissed by the court, are the product of extraordinary fraud on

the court, in violation of Applicant's due process rights under the Fourteenth Amendment of the United States Constitution.

RESPONDENT'S ATTORNEY CHERYL MCCALLIN

A. Cheryl McCallin is RESPONDENT's attorney, McCallin was classmates with Judge Royer at University 1, McCallin and Judge Royer are active members of many of the same legal associations and likely have known each other for decades, McCallin is the section chair for family law matters for the Chester County Bar Association, McCallin previously worked for the Chester County Courthouse as Master and Staff Attorney for Domestic Relations, McCallin's son recently was the law clerk for Chester County Judge Rovito and McCallin's former law firm Goldberg, Meanix, Muth and McCallin was previously sued in federal court claiming they conspired with a judge to hide exculpatory evidence and have the Plaintiff imprisoned on false charges.

B. McCallin's former law partner Dawson Muth, who was a former Chester County Judge, and Judge Knapp were specifically sued in the federal lawsuit. Applicant knows them both.

In 2003, Applicant was driving home around midnight, stopped at a stop sign and a police officer pulled up behind him. Applicant made a right turn and the police officer pulled over Applicant for no reason. The police officer claimed Applicant failed a field sobriety test, which Applicant disputed and the police officer arrested Applicant and charged him with Driving Under the Influence. There was no breathalyzer or blood evidence that Applicant was over the legal alcohol limit.

Applicant hired Muth to represent him. The police report, for the arrest, claimed the officer pulled up behind Applicant and that road was the township boundary. The officer claimed that as Applicant turned, his car passed over the solid yellow lines in the middle of the intersection, giving him a reason to pursue Applicant over township lines and pull him over.

Applicant had just bought a digital camera (that took black and white pictures), he went back to the intersection and took pictures of the intersection, that clearly did not have solid yellow lines in the middle of the intersection.

Applicant met with Muth and Muth agreed that if the police report was false and the officer did not have probable cause to pull him over, that the charges should be dismissed but Muth told Applicant that the black and white digital pictures were poor quality, he told Applicant to delete them (which Applicant did in front of Muth) and he told Applicant to go back and take better quality color pictures.

A few days later, Applicant returned to the intersection and found that the township had illegally painted solid yellow double lines making a right turn at the intersection. A few days earlier there were no solid yellow lines, Applicant has never seen solid yellow lines in the middle of an intersection before, if someone were to make a left turn they would be passing over solid yellow lines and his lawyer had advised him to delete the only evidence he had.

Applicant has no verifiable proof of misconduct but he found the circumstances highly suspicious. Applicant then completed the ARD program, the township dropped

the charges upon completion of the program and the charges were expunged from Applicant's record.

C. Applicant also interacted with Judge Knapp, a local district judge. A West Chester Borough code enforcement officer alleged that Applicant had placed trash outside of a trash can, on bulk trash pickup day and issued Applicant a citation, without warning.

Before Judge Knapp Applicant argued that Pennsylvania Law supersedes the Borough Code, the citation did not remotely comply with Pennsylvania Law (Judge Knapp refused to look at the Pennsylvania Municipal Solicitor's Deskbook, issued by the Pa Governor's office that explains Pennsylvania Nuisance Law), the officer failed to provide proper notice before issuing a citation, her supervisor had previously forced the officer to withdraw illegal citations she wrote against Applicant in the past, the officer admitted that she was aware the neighboring apartment building had previously placed garbage outside Applicant's property so she could not prove Applicant's tenants placed the trash there and Judge Knapp refused to view a video Applicant recorded of the code enforcement officer issuing a dozen citations (none of which appeared to comply with Pennsylvania nuisance law) targeting specific properties, while ignoring the exact same conditions at other properties. Judge Knapp literally said, "I don't care. You are guilty."

Applicant appealed Judge Knapp's decision to the Chester County Court of Common Pleas, the Borough solicitor asked to be scheduled as the last hearing (therefore there were no other witnesses in the courtroom), after Applicant

questioned the code enforcement officer, the Judge read the Pennsylvania Municipal Solicitor's Deskbook chapter on nuisance violations and dismissed the citation.

The court reporter hung up the phone on Applicant repeatedly when he requested the hearing transcripts and when her supervisor required her to produce the transcripts, the transcripts were drastically altered in a way that mitigated liability for the Borough. (Two years ago Applicant's home was broken into and those transcripts were stolen).

D. In 2020 Applicant files a petition to modify the child support because Applicant and RESPONDENT had been equally sharing custody during Covid. A week later, McCallin on behalf of RESPONDENT, files an emergency petition for special relief, containing outrageous and provably false statements, to obtain an emergency hearing and emergency custody order and immediately prevent a reduction in child support (See below).

E. In 2022, Applicant files a federal lawsuit demanding the DOJ take a criminal complaint, including, concerning the actions of RESPONDENT and a network of graduates from University 1. The DOJ argues they do not have to speak with Applicant, review evidence or take a criminal complaint so there is no record of the complaint. Applicant argued his case to the US Supreme Court and Certiorari was denied in 2023.

F. Applicant had stated that if Donald Trump wins the election he would be re-refiling his federal lawsuit demanding the DOJ take a criminal complaint, which directly implicates RESPONDENT's and McCallin's own conduct.

Applicant believes, that the evidence suggests, that after Trump won the election on November 20, 2024, RESPONDENT knew that it was imminent that Applicant would be filing a new federal lawsuit and feared that law enforcement would take a criminal complaint.

Three weeks later, on December 11, 2024 around 3:50 pm, McCallin delivered RESPONDENT's emergency petition to the Chester County Courthouse, requesting emergency custody of their children and requesting the court to order Applicant to undergo a psychological evaluation, to assess his "outlandish conspiracy theories".

RESPONDENT's petition calls Applicant "paranoid" and "delusional" but fails to allege that Applicant has ever mistreated or harmed his children, she presents no "clear and present danger", with "clear evidence of harm" and produces no "clear-cut evidence of active abuse, criminal charges, or an illegal attempt to relocate the child" that Judge Royer requires to secure an emergency custody order.

The emergency petition was denied and McCallin requested a 2-hour hearing that was scheduled on January 28, 2025 before Judge Sondergaard, which means the court scheduled a hearing 6 weeks away and did not believe it was an actual emergency.

Within the next 40 minutes, the judges were switched to Judge Royer (McCallin's university classmate, who she has likely known for decades). The hearing was moved to January 3, 2025 (before Trump takes office) and illegally scheduled for a full-day hearing without the required motion to the court.

A typical emergency custody hearing is only 30-60 minutes because the Applicant is required to submit verifiable proof that the children have been harmed, such as a police report or hospital report and the defendant has a few minutes to respond.

Applicant believes that the fact a full day hearing was scheduled, suggests the purpose of the hearing was actually intended to discredit Applicant's criminal complaints, by questioning him under oath for hours, when Applicant had no time to prepare to testify. McCallin spent hours calling Applicant delusional, paranoid and mentally ill, questioning Applicant about the details of his criminal complaints, with Applicant repeatedly objecting and Judge Royer allowing this happen in her courtroom and overruling every objection by Applicant.

The one thing McCallin did not do and the only thing that actually matters in an emergency custody hearing, is ask Applicant if the children have been harmed. Judge Royer's presentation on Emergency Petitions presented on April 19, 2022, stated "presentations should avoid emotional mudslinging or hostile attacks against the other party. Instead, they must center entirely on concrete facts that impact the child." Judge Royer permitted McCallin to violate the rules she sets for her courtroom.

If McCallin believed that Applicant's criminal complaints could implicate her own conduct she would have a motive to interfere with Applicant's criminal complaints.

PRIOR INCIDENTS AND COURT ACTIONS BROUGHT BY RESPONDENT

THE TRUCK INCIDENT

In the summer of 2015, after RESPONDENT initiated divorce proceedings, RESPONDENT told Applicant that she called the police because there was a car parked outside their home the previous night, the police found people doing drugs and the police told her to report any future suspicious activity to the police department.

Not long later, that night, Applicant was reading his daughter stories at bedtime and RESPONDENT was next door with their son.

A black truck pulled into their driveway and began revving its engine loudly. Applicant went outside to the driveway to investigate and the truck had its high beam lights on and backed out of their driveway in reverse, so he could not see its license plate, then backed down their entire street in reverse and drove away.

When Applicant came back inside RESPONDENT was standing in the hallway and asked Applicant what happened. When Applicant told her what happened RESPONDENT insisted he call the police.

Applicant refused because no one was using drugs and Applicant found the incident very odd. Applicant asked RESPONDENT if she heard the truck or saw the headlights. RESPONDENT denied seeing or hearing the truck. The truck was so loud the neighbors would have heard it and the truck's lights would have been visible from their son's bedroom.

RESPONDENT repeatedly insisted that Applicant call the police to report the truck and argued with him. Applicant refused to call the police.

Applicant believes there is evidence that RESPONDENT wanted Applicant to call the police to report the truck incident and then she would deny seeing or hearing the truck, to create police report and falsely claim Applicant was experiencing delusions.

THE DAUGHTER INCIDENT

In the summer of 2015, after RESPONDENT initiated the divorce proceedings, RESPONDENT was still cooking Applicant dinner every night. For about a month, Applicant began falling asleep shortly after eating dinner each night around 7 pm and sleeping until 6 am the following day, which Applicant had never experienced before and has not experienced since.

At that time, RESPONDENT claimed that their two year-old daughter was waking up in the middle of the night, each night, and Applicant was sleeping through the night, claiming it presented a safety risk for their daughter and this was the reason RESPONDENT demanded Applicant live with his parents to supervise their children, as a condition of their custody agreement.

At this time, RESPONDENT was sleeping on the couch each night and Applicant witnessed RESPONDENT with their daughter on the couch each morning.

While this was happening, one night, Applicant did not fall asleep immediately after dinner. Applicant woke up around 11 pm, sitting in bed, for about 30 minutes, while the house was silent.

Applicant heard RESPONDENT's phone alarm and she got up from the couch, walked into their daughter's bedroom, woke up their daughter and carried their daughter to the couch in the living room.

Applicant asked RESPONDENT why she woke up their daughter, who was silent and sleeping. RESPONDENT told Applicant that he needed to get his ears checked because their daughter was crying.

Applicant believes there is evidence that RESPONDENT was surreptitiously putting sleeping medication in his food to make him pass out after dinner each night, that their daughter was not actually waking up each night and RESPONDENT fabricated claims of a safety issue to force Applicant to live with his parents and demand that his parents supervise his visits.

CONTEMPT HEARING 2016

In 2016, Applicant told RESPONDENT that his parents were going to Ocean City, NJ for Memorial Day and asked if he could bring their children to Ocean City at their family's beach house for the weekend. RESPONDENT verbally agreed.

After that weekend, RESPONDENT requested a contempt hearing, claiming she did not agree for Applicant and their children to stay the weekend in Ocean City with his parents and the requirement that Applicant stay at his parents' house, requires him to stay at their house, not to have Applicant's parents supervise the visits (APPENDIX M). Applicant was held in contempt and fined \$100.

At the emergency hearing on 1/3/25 RESPONDENT claimed that the requirement to have Applicant stay at his parents' house was because she wanted his

parents to supervise his visits, which is the opposite of what RESPONDENT told the court in 2016.

EMERGENCY PETITION FOR SPECIAL RELIEF 2020

As per their custody agreement, when the children attend school they stay with RESPONDENT on Wednesday and Thursday overnight, which entitles RESPONDENT to receive child support. When the children do not attend school they share custody equally.

In March 2020, their children began attending school virtually because of Covid and both agreed to share custody equally, since the children were not physically attending school.

In August 2020, Applicant filed a petition to modify child support, since they were sharing custody equally. RESPONDENT immediately demanded that Applicant return the children for Wednesday and Thursday overnights and Applicant refused, continuing to follow the schedule they agreed on since March, which entitles him to a reduction in child support.

A week later RESPONDENT files an emergency petition for special relief, falsely claiming Applicant is having mental health issues, falsely claiming Applicant recently had “several psychotic episodes”, falsely claiming that “[h]e has lost several jobs and was recently fired due to his mental health issues” and she falsely claimed Applicant was “withhold[ing] the Minor Children” (APPENDIX N).

Applicant never withheld the children, which means refusing all custody exchanges. Applicant produced a note from a psychiatrist, he had seen for four years,

stating Applicant never has had a psychotic break and Applicant was recently fired from a job that RESPONDENT knew he had held for over 10 years. (APPENDIX O). Applicant has a doctorate in education, was a teacher and worked in education for 20 years. Applicant had helped his children complete all their online assignments since March 2020 and always helped their children complete their homework assignments from school during his visits over the previous five years and their children have always received good grades.

If RESPONDENT had stated that the dispute was over the language of the custody schedule, she would have to wait 6 months for a hearing and Applicant would be entitled to a reimbursement of child support.

The court only has emergency jurisdiction to enter an emergency custody order if the children have been subjected to mistreatment or abuse and the court needs evidence.

The court should have dismissed her emergency petition because there was no actual emergency, RESPONDENT presented the hypothetical argument that the children could potentially fall behind in school, contrary to the available evidence since the previous school year the children completed all their virtual assignments with Applicant and received good grades; RESPONDENT claimed Applicant had "several psychotic episodes" and mental health issues and Applicant presented a psychiatrist note proving that allegation was false.

The court entered an order requiring Applicant to exchange custody of the children so RESPONDENT would have the children overnight on Wednesday and Thursdays, thus entitling RESPONDENT to continue receiving child support.

A WIDE-RANGING CONSPIRACY THEORY

RESPONDENT, Judge Royer, multiple federal judges have repeatedly ignored evidence of federal crimes presented to interfere with cases brought before them and called Applicant's assertions a "bizarre" or "outlandish" "wide-ranging conspiracy theory".

Federal District Judge Alejandro Quinones, who twice dismissed Applicant's federal petitions, stated, "[I]t is difficult to discern from Petitioner's allegations... how the conspiracy functioned". Then Judge Alejandro Quinones dismissed the petition without a hearing or review of evidence to determine "how the conspiracy functioned".

(It is worth noting that Judge Alejandro Quinones was appointed by President Obama alongside Judge Restrepo of the Third Circuit and Judge Schmehl of EDPA. Judge Restrepo, in pending US Supreme Court case 26-153, twice dismissed Applicant's requests for witness protection, thus hiding Judge Alejandro Quinones' misconduct in the case and Judge Schmehl in the EDPA dismissed a similar case to Applicant's [See *Martinez v United States of America, et al.* EDPA 19-cv-3708 (2020); Martinez claimed he was followed, his home was repeatedly broken into, property damaged, surveillance, interference with his phone and mail and his children illegally removed from his custody, with the court citing many similar cases that have been dismissed by federal courts and calling his petition frivolous]). (Removing parental

custody is commonly reported in these complaints, with claims of retaliation for exposing corruption.) So, the federal district court for the Eastern District of Pennsylvania is presiding over dozens of cases all claiming the exact same crimes are being committed against them, with law enforcement refusing to take a criminal complaint, so there are no records of these crimes, and federal judges are dismissing all of these lawsuits calling them frivolous.

Judge Alejandro Quinones cited precedent, in other cases, that pro se litigants are entitled to amend their petitions (See *Greene v Graaf*; EDPA 2:19-cv-04734-NIQA, (2019) [Document 4], where Greene alleged his home was illegally entered 75 times, his property stolen, his phone was hacked, he was stalked and harassed. Judge Alejandro Quinones requested he amend his petition.)

So, court staff are assigning multiple lawsuits to Judge Alejandro Quinones' and Judge Schmehl and the lawsuits are telling them the exact same thing, that whistleblowers are having their homes broken into, phones hacked, they are being followed, property stolen and damaged and law enforcement refuse to take a criminal complaint, so there are no records of these crimes, and Judge Alexandro Quinones and Judge Schmehl dismiss these complaints without a hearing or discovery.

A review of hundreds of federal lawsuits from around the country utilizing the search term "wide-ranging conspiracy theory" Applicant noted that in every civil lawsuit reviewed, where the litigant presented evidence that a series of crimes was committed against them, their families and friends by multiple actors in retaliation for whistleblowing, political speech or attempting to file a criminal complaint or

lawsuit, federal courts dismissed the lawsuit calling it a “wide-ranging conspiracy theory” and citing the exact same precedents, usually *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544 (2007); and *Ashcroft v. Iqbal*, 556 U.S. 662 (2009) claiming the lawsuit is frivolous and implausible.

Many of the very same judges’ names kept appearing over and over dismissing these lawsuits. Two notable judges who dismissed similar cases are Judge Boasberg (*Mischler v Pence D.D.C. 1:20-cv-01863 (UNA)*, (2020); dismissed as a “wide-ranging conspiracy” and Judge Chutkan (*Wilson-Bey v Dept. of Justice D.D.C. 1:21-cv-03397 (UNA)*, (2022); dismissed as a “wide-ranging conspiracy.” These federal judges are taking out whistleblowers like “hitmen for the mob”.

Many of these lawsuits have common themes, the petitioner claims to be retaliated against for 1. whistleblowing, political speech, attempting to file a criminal complaint or threatening a lawsuit 2. They claim they were illegally retaliated against 3. Law enforcement refused to speak to them, review evidence or to take a criminal complaint, so there is no record of these crimes. 4. Then petitioner was further retaliated against with escalating crimes against them and their families to discourage them from pursuing their criminal complaints or lawsuit, with their phone being hacked so they cannot post on social media, share evidence or inform other people about what is happening to them. 4. The victim files a federal lawsuit and the judge dismisses their lawsuit claiming it is a “wide-ranging conspiracy theory”, suggesting the victim is mentally ill and stating it is “frivolous”.

See Sawicki's claims in US Supreme Court case 26-181 (Sawicki v Wilson et al): Sawicki a civil rights lawyer, agreed to represent a retired teacher who owned a cat sanctuary. Her client was transporting cats in her van when she was stopped and arrested leaving the cats unattended in the van and several cats died. The client was then charged with animal cruelty.

While incarcerated, the township demolished her home without notice. Sawicki questioned township officials about the demolition of her client's property, without Due Process of law, threatening a civil lawsuit.

Sawicki represented her client at her criminal trial and the judge and another attorney, present at that trial, filed bar complaints against Sawicki claiming Sawicki was erratic, suggesting she was mentally ill and Sawicki's law license was suspended preventing Sawicki from filing a civil lawsuit against the township.

Sawicki claimed that the township realized the financial liability of the threatened civil lawsuit, retaliated against her, by having a judge make false allegations against her to remove her law license, with the intent to interfere with the pending civil lawsuit.

Sawicki's federal lawsuit was dismissed with prejudice stating her claims of a "wide-ranging conspiracy" and "her implausible and conclusory assertions fail to state claims upon which relief can be granted." Judge Bibas, of the Third Circuit, in his opinion described Sawicki as having "mental impairments". (Judges Bibas, Porter and Montgomery-Reeves, also authored an outrageous opinion in Givey v DOJ (US

Supreme Court case 23-7063) fabricating claims, which made Givey's allegations appear unbelievable.

It is worth noting that many lawyers who represented the victims of Jeffery Epstein had bar complaints filed against them (Attorneys Brad Edwards, David Boies, Sigurd McCawley) and the use of retaliatory bar complaints as “sword and shield” litigation is a well-documented pressure tactic in high-stakes legal battles, in an effort to end the lawsuit. (See also *Richard Silverberg v Dupont De Nemours Inc.* (3d Cir. 2026) Silverberg, a lawyer, claimed he was writing a book exposing corruption in the City of Philadelphia, when the City improperly initiated a tax judgement against him, his lawyer sabotaged his case, the judge improperly sanctioned him, leading to the loss of his law license and the Third Circuit described his claims as a “vast conspiracy” and affirmed the lower court’s judgement dismissing his case.)

The federal judges dismissing these lawsuits are the very same judges disqualifying US Attorneys so they can appoint their own US Attorneys in six DOJ offices, DNJ., EDVA, DNEV, NDNY, SDCAL and CDCAL.

Applicant does not wish to end up in the situation described by Sawicki, in a courtroom, with false allegations made against him.

In hundreds of federal lawsuits Applicant reviewed, where the appellants alleged the same fact pattern of a conspiracy, described above, the federal courts dismissed the lawsuits without a hearing, discovery or witness testimony, including many cases before the federal court EDPA and the Third Circuit, hiding the details of the crimes committed.

In contrast, when the government initiated proceedings before the very same judges alleging a wide-ranging civil or criminal conspiracy against multiple defendants those very same judges issued subpoenas, allowed discovery, allowed witnesses to testify because that is the only way that a conspiracy can actually be proven.

Federal courts are ignoring evidence of federal crimes in hundreds of whistleblower lawsuits and holding them to an impossible standard, preemptively dismissing petitions, then claiming the victim cannot prove the conspiracy.

A victim only has to show evidence that any crime has occurred to make a criminal complaint with law enforcement.

Applicant provided evidence his home was broken into repeatedly to threaten him to abandon his criminal complaints and his food was tampered with drugs. Applicant produced pictures of his damaged bedroom door (APPENDIX P) and the drugs found in his coffee mug (APPENDIX Q). Applicant produced evidence his court mail has repeatedly been illegally interfered with, his phone and email has been tampered with and a false criminal complaint was filed against Applicant. Like hundreds of other lawsuits, Applicant's cases have been dismissed, allowing dozens of ongoing, federal crimes to continue unobstructed by federal law enforcement.

After former FBI Director Mueller effectively shut down the FBI's organized crime task forces across the country in 2002¹ and the DOJ shut down their organized

¹ <https://www.rollingstone.com/culture/features/is-the-american-mafia-on-the-rise-w451888>

crime task forces in 2008², over 1,000 whistleblowers have reported law enforcement refused to investigate serious crimes, Jeffrey Epstein (254 victims over 10 years), Pennsylvania Kid for Cash scandal (over 400 alleged victims over 10 years), Jerry Sandusky (52 alleged victims over 15 years), Larry Nassar (265 alleged victims over 18 years), Harvey Weinstein (over 100 alleged victims over 10 years), Mike Jeffries (dozens of alleged victims over 20 years).

Law enforcement confirmed over a hundred of these victims were illegally surveilled after attempting file a criminal complaint with law enforcement (New Yorker article, Harvey Weinstein Army of Spies)³, (CNN, “Jeffrey Epstein allegedly hired private investigators and engaged in a campaign of intimidation against accusers”)⁴ and Mike Jeffries⁵ (allegedly hired a security company to monitor and threaten his victims for twenty years)⁵.

Yet, federal judges have dismissed hundreds of cases of whistleblowers reporting that law enforcement refused to take a criminal complaint and the victim reports being retaliated against, with the judges calling it an implausible, wide-ranging conspiracy theory and sometimes fabricating claims to make the victim appear crazy, thus hiding any evidence of these crimes.

²Anastasia, George. 2008, Sept. 16. Organized Crime Strike Force Being Combined. Philadelphia Inquirer.

³ <https://www.newyorker.com/news/news-desk/harvey-weinsteins-army-of-spies#:~:text=Two%20private%20investigators%20from%20Black,least%20four%20meetings%20with%20McGowan.>

⁴ <https://www.cnn.com/2019/07/12/us/jeffery-epstein-witness-intimidation/index.html>

⁵ <https://www.nbcnews.com/news/us-news/former-abercrombie-fitch-ceo-charged-sex-trafficking-dementia-lawyers-rcna185353>

Before the FBI targeted organized crime, in the 1950's and 1960's, organized crime heavily infiltrated political organizations allowing them to hand-pick local and state judges, prosecutors and police chiefs. Once installed, these hand-picked officials ensured that the criminal enterprise operated with near-total immunity. Police Chiefs directed officers away from criminal operations, prosecutors declined to file charges, and corrupt judges dismissed cases. "Corrupt judges and district attorneys, far from crusaders for truth, were often little more than legal hitmen for the mob."⁶

A notoriously corrupt Judge Martin T. Manton, who served on the US Court of Appeals for the Second Circuit in New York City, from 1918-1939, received \$17 million in kickbacks, he used third-parties to hire an insurance broker "to funnel kickbacks to Manton's sister and niece", and he would release mobsters on bail, "whereupon, they promptly began assassinating witnesses against them."⁷

Today, after the FBI and DOJ effectively shut down their organized crime task forces, there is evidence that organize crime is, once again, operating in the United States with impunity and without any interference from federal law enforcement, whistleblowers are blocked from making a criminal complaint, so there are no records of the crimes, then threatening and harming victims and their families.

WEST CHESTER BOROUGH

⁶ <https://medium.com/@cfmarciano/black-rob-and-blood-money-the-mafias-hold-over-the-courts-in-1950s-60s-new-jersey-and-new-york-23aa184e011e>

⁷ <https://time.com/6297365/lessons-corrupt-judge-us-history-essay/>

Shannon Royer, Judge Royer's husband, was a West Chester Borough Council member from 1994-2001. Applicant attended West Chester University from 1994-1998.

Between the years of 1994-1996 Applicant attended many college parties. The police often came to the parties, were friendly, they usually issued the person who held the party a \$100 fine for a noise violation and told everyone else to go home without any consequences.

Between the years of 1997-1998 the police began setting up aggressive undercover sting operations to infiltrate college basement parties and arrest hundreds of people in attendance, who were underage drinking and charge the party hosts with felonies.

But the police would not target fraternities or sororities and this was written about in the newspaper at the time. Applicant many times witnessed the police observing underage drinking occurring at fraternity parties, openly in the backyard of their fraternity houses, with hundreds of underage drinkers in attendance and the police took no action. The question Applicant asked was; "Why would the police go through all the trouble of setting up undercover sting operations to bust smaller basement parties, while ignoring fraternities openly engaging in underage drinking at larger backyard parties?"

There are about 2,150 people at West Chester University who are members of fraternities and sororities. The mayor of West Chester was elected in 2021 with about 2,103 votes and after a term as mayor where she gained control of the police

department she was reelected with 4,044 votes (92% of the votes) in 2025 and Borough Council members were elected with many less votes. The mayor in West Chester supervises the police chief.

Therefore, if a local politician could obtain the 2,150 votes from the fraternities and sororities they could win any local election. They do not need everyone to vote for them, they only need more votes than the opposing candidate. So, how do you get 2,150 college students in fraternities and sororities to vote for you?

The mayor is the police chief's supervisor and could order the police to target underage drinking. If the police were to allow underage drinking to occur at fraternities and sororities in exchange for votes they could win every local election. The incentive for fraternities and sororities to vote for them would only exist if the police targeted underage drinking at other parties, while ignoring underage drinking at fraternity parties.

At the same time, while Shannon Royer was on Borough Council, the Borough creates a rental inspection scheme and code enforcement scheme. In 1999, the Borough had 3,932 rental units and only inspected 1,118 rental units and the Borough was sued with allegations they were targeting specific landlords and rental properties with code enforcement. In 2010-2014 Applicant observed the Borough code enforcement officers target specific rental properties and ignore similar conditions at other properties, raising the questions: 1) Why; 2) Who are they targeting?; 3) Who are they not targeting?

If the Borough had an avenue to win local elections, the mayor and Borough Council would supervise department heads at the Borough, who hire the code enforcement officers. They would need more votes to elect their choice of County District Attorney, County Judges, the Prothonotary and school board members. West Chester Borough is the county seat for the wealthiest county in Pennsylvania and the center for many associations, social groups and fraternal organizations with about 30% of the population belonging to these organizations.

If someone could offer these organizations and their associated businesses immunity from code enforcement in exchange for votes, they would then have enough votes to elect the District Attorney, County Judges and school board members.

In Chester County there are 12 school districts, which offer some of the highest salaries in the country. For example, the West Chester Area School District, where RESPONDENT was hired after graduation from college, has 1,100 teachers, a top teacher salary of \$110,000 and receives 750 applications for every open teaching position. Applicant worked as a teacher in Chester County and witnessed school administrators hire uncertified and unqualified teachers, when they were receiving hundreds of applications from certified teachers. If someone could offer a teaching job in exchange for votes, they would have thousands of votes. If this is taking place it would completely undermine our elections.

So, Shannon Royer, was a West Chester Borough Council member, at the time the police began selectively targeting underage drinking and at the time the Borough begins selectively enforcing a rental inspection and code enforcement scheme.

Applicant described a way these schemes could potentially be used to secure favorable elections outcomes and Shannon Royer's wife, Judge Royer, wins two elections as a Chester County judge.

Applicant files a federal lawsuit demanding law enforcement take a criminal complaint, including concerning the Borough's code enforcement scheme, RESPONDENT then initiates emergency custody proceedings against Applicant, the judge is immediately switched to Judge Royer, who issues an order that violates Pennsylvania law and is contrary to Judge Royer's own stated expectations on the requirements for securing an emergency petition.

APPLICANT'S FATHER

On December 18, 2025 Applicant files a motion to disqualify Assistant US Attorney Mark Sherer in federal district court EDPA, that is now currently pending before the US Supreme Court no. 25-153. Mark Sherer is required to refer that motion to disqualify to the DOJ Office of General Counsel as per DOJ policy (see U.S. Dep't of Just., Just. Manual § 3-1.140). Instead, Judge Alejandro Quinones allows Sherer to personally respond in violation of DOJ policy.

On December 29, 2025 Applicant's 83 year-old father texts him and says that he googled Applicant's name and discovered Applicant was involved with a federal court case. Applicant's father stated that if Applicant's federal lawsuit is dismissed, he thinks that Applicant should not appeal to the Third Circuit. Applicant texts his father that he will not discuss the case with him.

Applicant's father then calls Applicant and says "I just became recently aware, like I said, of all these filings you've been doing for some reason... And but now the last thing is you were asking people to be disqualified. And the group of that you want to help you out. So that's kind not, I guess, but, you know, it seems like a reverse, uh, uh reasoning anyway, on that, that they, how can they, how can you disqualify him if you're asking them and that part of the government to help you out?" (APPENDIX R).

Judge Alejandro Quinones dismissed Applicant's case the very next day on 12/30/25.

Applicant has told local, state and federal judges that he and his family have been threatened and harmed for years and Applicant's request for witness protection has been ignored by the courts for years. (Hundreds of federal lawsuits have made the same claims).

The day before Applicant's case is dismissed, his father claims he googled Applicant's name and discovered Applicant's court filings and his father is obviously not telling the truth because he can't just google Applicant's name and read Applicant's recently submitted motion to disqualify.

So, Applicant's father claims he just read Applicant's court filings and discovered Applicant's home has been repeatedly broken into, his food tampered with drugs and he just discovered that Applicant's children have been illegally removed from his custody for a year. And Applicant's father's biggest concerns are: 1) that if the case gets dismissed he does not want Applicant to appeal to the Third Circuit; and 2) he

does not think Applicant should have filed a motion to disqualify Assistant US Attorney Mark Sherer. This is so incredibly convenient, that Applicant's father is such a fervent advocate for Sherer, that Applicant finds it unbelievable and does believe his father was threatened to interfere with his federal lawsuit, in which Applicant demands the DOJ to take a criminal complaint.

SUMMER 2015

In the summer of 2015, RESPONDENT had threatened to divorce Applicant and demanded he participate in family outings every weekend with her, her mother (who is a psychiatric nurse) and their children, going to the park, orchard or Longwood Gardens as RESPONDENT's father remained at Applicant's and RESPONDENT's home.

While at the outing every weekend Applicant would be followed and video recorded the entire time. The person following Applicant would show him their phone was recording video, then they would follow him for the next few hours recording him, while RESPONDENT and her mother pretended not to notice.

(RESPONDENT did the exact same thing to their son. Applicant's son had gone food shopping with Applicant for a year in 2024 and observed that every time Applicant went food shopping, every week, a person would show them they were recording video of them on their phone and then follow them throughout the store the entire time recording them.

By 2025 RESPONDENT had already removed Applicant's custody rights, their son was 14 years old and had not gone food shopping with his mother for years.

RESPONDENT began demanding their son accompany her food shopping every week, where their son described that a person would follow them through the store, recording video of them the entire time, with RESPONDENT pretending not to notice.

RESPONDENT would ask their son if he was ok or comment that he looked very concerned, with their son refusing to tell her about the person following them because he believed she was gaslighting him, since she could clearly see the person following them.

At this time, RESPONDENT repeatedly requested their son to undergo a psychological evaluation for the custody proceedings. Their son refused to participate in a psychological evaluation and Applicant believes RESPONDENT wished to have their son psychologically evaluated as a backdoor way to have a psychologist claim Applicant was having delusions and claim those “delusions” were psychologically harming their son because now their son believed he was being followed also.

After their son refused to participate in the psychological evaluation, RESPONDENT stopped demanding he accompany her food shopping every week and their son has reported that he has not been followed for the past year.

Due to RESPONDENT's gaslighting, which is psychological abuse, her repeated requests to have him psychologically evaluated and the fact she unjustly removed the custody of his father Applicant's 15 year-old son has told him that he no longer wishes to live with his mother and wants to be emancipated, so the court will no longer have jurisdiction over him and he can live with Applicant.)

In the summer of 2015, while Applicant and RESPONDENT were on the weekend family outings, RESPONDENT's father would remain at their house for hours. During this time Applicant observed the physical copies of the Borough Code Violations and copies of his dissertation edits from University 1 were stolen from his home and digital copies were deleted from his computer and hard drives. When Applicant questioned RESPONDENT about the missing and deleted files she stated that Applicant was not mentally well and he must have misplaced them.

Applicant did not witness RESPONDENT's father delete any of the files or remove any physical evidence but he did observe her father do some strange things, such as connect his laptop to their internet router with an ethernet cable for 15 minutes, claiming he was having trouble connecting to their wireless, but he would not let Applicant see his laptop to help with the wireless connection. When RESPONDENT claimed she was having issues with her iPhone in 2015, Applicant told her the iPhone was still covered by warranty but she wanted her father to examine it first and her father asked for Applicant's iPhone sim card and Applicant believes he may have cloned his sim card, which would have enabled him to view all Applicant's text messages and give him access to all of Applicant's iPhone passwords, such as for email.

RESPONDENT's father was a director for the federal Department of Labor. He spent years during president Obama's presidential administration reorganizing the federal field offices for the state of Texas and Maryland. He was also an assistant director in New Jersey and ended his career as a director, of the most powerful office

in the country, located in New York City. While he was director of the field office in Maryland, he hosted a convention for the Department of Labor with every director across the country participating. Therefore, he personally knew every director for the Department of Labor across the entire country and Applicant believes a phone call from RESPONDENT's father could initiate or shut down a Department of Labor investigation across the entire country.

Applicant described how local law enforcement were selectively enforcing laws and believes they do so to interfere with the fair administration of the local, county and state elections. If RESPONDENT's father organized the federal Department of Labor field offices in Texas, Maryland, New Jersey and New York City to selectively enforce federal labor laws, with the purpose of interfering with our fair elections, it would be a national crisis that would require the government to postpone the midterm elections scheduled for November 2026. But amazingly convenient for RESPONDENT's father, Assistant US Attorney Mark Sherer from the DOJ has blocked Applicant from making a criminal complaint for years, refusing to speak to Applicant, review evidence or create any record of Applicant's complaints.

When Applicant told his sister in 2015 that he was being followed and his phone was wiretapped and tracked, she responded, "That would take government resources right?" Applicant agreed and she responded, "And who in your family has those government resources?" She sounded scared and immediately hung up the phone call. RESPONDENT's father being the only family member with those type of

government resources. Later that year, Applicant's sister came to him crying and telling him and she and other family members were being threatened.

When RESPONDENT's brother divorced, his ex-wife was immediately fired from her job, received no child support or alimony, her best friend was also jobless and recently divorced and both were destitute, sharing a two-bedroom apartment, with their six children. So, just like when Applicant and RESPONDENT got divorced, his whole life fell apart, his career, his friends (Applicant's two best friends were declared mentally ill) and his finances.

ARGUMENT

Under Rule 23 of this Court and the All Writs Act, 28 U.S.C. 1651, to obtain a stay pending review by this court, an applicant must show the likelihood of success, reasonable probability of obtaining a writ of certiorari and likelihood of irreparable harm. It is worth noting that any federal judge, including Justices of the United States Supreme Court, are required to act under Code of Conduct for United States Judges, if a crime is committed to interfere with a case before them, they must act to maintain the integrity of the courts.

A. APPLICANT IS LIKELY TO SUCCEED ON THE MERITS BECAUSE THE TEMPORARY EMERGENCY CUSTODY ORDER WAS ISSUED UNLAWFULLY AND APPLICANT'S CONSTITUTIONAL RIGHTS HAVE BEEN VIOLATED AND APPLICANT IS ENTITLED TO THE RELIEF REQUESTED UNDER AMERICAN WITH DISABILITIES ACT

Applicant is likely to succeed on the merits of his petition for Writ of Certiorari before the Supreme Court of the United States. The emergency custody orders for which Applicant requests an emergency stay were procured through extraordinary fraud on the court.

While RESPONDENT initiated this case as an emergency custody petition Applicant believes the true purpose of these proceedings are to interfere with his criminal complaints, currently pending before this Court in US Supreme Court case 26-153.

In US Supreme Court case 26-153 Applicant believes that someone intercepted service of his petition to the United States Solicitor General and fraudulently submitted a waiver of response at 11:54 pm, Friday night on 8/7/26 and his petition was not reviewed by the Solicitor General of the United States.

Applicant is entitled to the requested relief under ADA and the Constitutional Due Process violations present in this case are unprecedented and extraordinary, which warrants review by this Court.

B. THE REMAINING FACTORS FAVOR A STAY

In considering whether to grant emergency relief, this Court further considers whether the underlying issues warrant review and applicant likely faces irreparable harm. Those factors heavily favor of a stay.

1. The issues present in this case are of national importance and warrant review by this Court. While RESPONDENT claims this is a custody case, Applicant believes this case truly concerns a wide-ranging conspiracy of local, state and federal

corruption by politicians, judges and law enforcement, in an effort to undermine our democratic safeguards and interfere with fair elections.

Applicant believes this is of national importance and the midterm elections scheduled for November 2026 should be postponed, until a thorough investigation into the allegations of misconduct and election interference is fully investigated.

2. Applicant has had the custody of children removed since Jan. 3, 2025 and applicant and his children have already suffered irreparable harm.

CONCLUSION

This Court should issue an immediate emergency stay of the temporary emergency custody orders issued by the Chester County Court of Common Pleas, pending appeal to the Supreme Court of the United States and pending appeal of any further proceedings in this case, until a full custody hearing is held and formal custody order of the court can be entered in this case.

Respectfully Submitted,

/s/Ryan P. Givey
Ryan P. Givey, APPLICANT
610.348.5720
Rpg2609@aol.com
428 Hannum Ave.,
West Chester, Pa 19380

Date: 9/21/26

APPENDIX

APPENDIX A
IN THE SUPREME COURT OF PENNSYLVANIA
MIDDLE DISTRICT

RYAN P. GIVEY,

Petitioner

v.

ALICIA A. GIVEY,

Respondent

: No. 163 MAL 2026
:
:
:
: Petition for Allowance of Appeal
: from the Order of the Superior
: Court
:
:
:
:
:

ORDER

PER CURIAM

AND NOW, this 11th day of May, 2026, the Application for Emergency Relief and the Petition for Allowance of Appeal are **DENIED**.

A True Copy Elizabeth E. Zisk
As Of 05/11/2026

Attest: 
Chief Clerk
Supreme Court of Pennsylvania

**Additional material
from this filing is
available in the
Clerk's Office.**