

**COVER LETTER - TO THE CLERK OF COURT**

United States District Court for the Northern District of  
California  
San Jose Division  
280 South First Street, Room 2112  
San Jose, CA 95113

**FILING OF NOTICE OF REMOVAL - FEDERAL JURISDICTION UNDER  
28 U.S.C. §§ 1331, 1343, 1443, 1455, AND 1651**

Dear Clerk of Court,

Please accept for filing the enclosed Notice of Removal relating to several actions previously pending in the Santa Clara County Superior Court. This filing is made pursuant to 28 U.S.C. § 1446(d) and is intended for jurisdictional notice and record purposes only.


This submission is not a new state-court action and does not seek relief within the jurisdiction of this Court. It simply provides formal notice that the referenced state matters have been removed to federal jurisdiction, with substantive proceedings to occur in the United States District Court for the Western District of Texas, Austin Division.

Please note that any prior "vexatious litigant" designation issued by the California state courts applies only within the state-court system and does not extend to filings in federal court. This filing is therefore not subject to any state prefiling order or screening requirement.

Kindly file and docket this Notice in accordance with 28 U.S.C. § 1446(d). A self-addressed stamped envelope is enclosed for return of a file-stamped copy.

Thank you for your attention and assistance.

Respectfully submitted,

**Royce Mars,**   
6001 W Parmer Ln Ste 370 448,  
Austin, TX 78727  
(202) 505-6444  
MarsJustice@pm.me

Dated: January 26, 2026

**Royce Mars**

*[Legal name: Kostiantyn Mars - Name change petition denied in California due to systemic obstruction of justice and denial of access to court during aggravated kidnapping of Petitioner's son Max Mars, international abduction of Max Mars outside of the United States, killing Hope, Petitioner's mom, theft of \$200,000 under color of law, unlawful incarceration of Petitioner, denial of access to California courts by legally void Vexatious Litigant order signed by disqualified child trafficker and racketeer Stephen Lowney, and targeted racketeering attack on Petitioner with unlawful arrests by organized criminals from Gavin Newsom's California Mafia Cartel led by homosexual presiding judge Beth McGowen, financed and coordinated by organized criminal group of aggressive Ukrainian homosexual pedofiles Sir Gay "Gordon" Nahorny and Ivan "Pedofile" Omelchenko, serial racketeers and criminal leaders of the Ukrainian Mafia Cartel "Kodlo Gondona Nahornoho" ("SI Trans Group").*

*Petitioner uses his actual name "Royce Mars" for clarity and consistency across all filings pending lawful recognition of the name change.]*

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

**NOTICE OF REMOVAL & EMERGENCY TRO PACKAGE**

***(Filed under 28 U.S.C. §§ 1331, 1343, 1367, 1441, 1443, 1455, 1651)***

**Related State Court Matters::**

B2402220 - Criminal (Santa Clara County, CA)  
22DV000779 - Domestic Violence (Santa Clara County, CA)  
22FL003144 - Family Law (Santa Clara County, CA)  
24CV441024 - Name Change (Santa Clara County, CA)

**ROYCE MARS,**

Plaintiff / Petitioner,

v.

**STATE OF CALIFORNIA;**

**GAVIN NEWSOM'S CALIFORNIA MAFIA CARTEL;**

**SANTA CLARA COUNTY SUPERIOR COURT;**

**SANTA CLARA MAFIA CARTEL (BBMP - Bench, Bar, Media, Police  
Criminal Syndicate);**

**HANNA MARS (Petitioner in 22DV000779, 22FL003144, B2402220);**

**and all related officials and agents acting under color of law,  
Defendants / Respondents.**

**Notice of Removal & Emergency TRO Package B2402220, 22DV000779,  
22FL003144, 24CV441024**

## NOTICE OF REMOVAL

### Plaintiff/Petitioner:

Royce Mars

### To:

The United States District Court  
for the Northern District of California, San Jose Division

## I. STATUTORY BASIS FOR REMOVAL

This Notice of Removal is filed pursuant to the following statutes:

- 28 U.S.C. § 1443 (Civil rights removal)
- 28 U.S.C. § 1331 (Federal question jurisdiction)
- 28 U.S.C. § 1343 (Civil rights and equal protection enforcement)
- 28 U.S.C. § 1455 (Criminal prosecutions removal procedure)
- 28 U.S.C. § 1367 (Supplemental jurisdiction)
- 28 U.S.C. § 1651 (All Writs Act)
- 28 U.S.C. § 1441 (General removal provision)

## II. CASES BEING REMOVED

Petitioner seeks removal of the following California state cases to this Court for federal review and consolidation:

- Santa Clara County Superior Court Case **B2402220** (Criminal)
- Santa Clara County Superior Court Case **22DV000779** (Domestic Violence Restraining Order)
- Santa Clara County Superior Court Case **22FL003144** (Family Law / Custody / Divorce)
- Santa Clara County Superior Court Case **24CV441024** (Name Change)

### **III. GROUNDS FOR REMOVAL**

Removal is sought on the basis of systemic obstruction of justice, denial of access to California courts, denial of constitutional rights, and organized racketeering activities under color of law, resulting in the deprivation of Petitioner's rights secured under the U.S. Constitution and federal civil rights statutes.

#### **Specifically:**

##### **1. Denial of Access to California Courts and Equal Protection**

Petitioner was denied meaningful access to the California courts and subjected to biased proceedings before disqualified judges (Stephen Lowney, Andrea Flint, James Towerly) and cooperating criminal court judges (Thomas Kuhnle, Benjamin Williams, Michael Clark), coordinated by homosexual presiding judge Beth McGowen biased in favor of aggressive Ukrainian homosexual pedofiles Sir Gay "Gordon" Nahorny and Ivan "Pedofile" Omelchenko (leads of Ukrainian Mafia Cartel "SI Trans Group") who kidnapped Petitioner's son Max Mars and are holding Max Mars hostage without right for a contact or a phone call.

##### **2. Pattern of Racketeering Activity (RICO-Related Conduct)**

From 2022 - 2026, Petitioner was subjected to a coordinated racketeering attack involving unlawful arrests, fabricated bench warrants, fabricated criminal charges, coercive custody stipulations, and legally void restraining orders (DVROs) issued by disqualified judges under color of law.

##### **3. Unlawful Seizure of Assets and Property, and Retaliation**

Unlawful wage garnishment via DCSS under a legally void order signed by disqualified judge Andrea Flint, assets seizures - including Petitioner's 401(k) seizure, seizure of property including car VW Tiguan (plate 7ZND242), employment loss during targeted racketeering attack.

##### **4. Kidnapping and Custody Interference**

Petitioner's son Max Mars is unlawfully kidnapped (removed from Petitioner's custody under unlawful legally void orders of disqualified judge James Towerly); is unlawfully detained in California without right for a contact or phone call, in violation of federal parental and constitutional protections; all contact with Max Mars is blocked; orders issued by disqualified judges Stephen Lowney, Andrea Flint

and James Towery are used to facilitate international abduction of Max Mars from the United States to Ukraine.

**5. Murder and Coercion under Color of Law**

Organized criminals from California Judicial Mafia Cartel killed Hope, Petitioner's mom, 95 years old senior woman with disabilities, using it as the unfair leverage to diverge Petitioner from legal battle - which preceded by threats to kill Petitioner's mom and kidnap his son Max Mars outside of the United States to Ukraine to coerce Petitioner to surrender custody rights and extort passport, green card and all documents of Petitioner's son Max Mars.

**6. Systemic State-Level Corruption and Oversight Failure:**

Oversight bodies, including the California Commission on Judicial Performance (CJP), California State Bar, and Attorney General's Office refused to intervene in child abduction and targeted racketeering attacks, thereby perpetuating the deprivation of rights.

**7. Interstate and International Conspiracy**

Obstruction of justice, denial of access to court, kidnapping of Petitioner's son Max Mars, extortion of money and documents of abducted child Max Mars, unlawful arrests and fabrication of bench warrants against Petitioner were executed by organized group of criminals from California Judicial Mafia Cartel led by homosexual presiding judge Beth McGowen, financed and coordinated by organized criminal group of aggressive Ukrainian homosexual pedofiles Sir Gay "Gondon" Nahorny (Serhii "Gondon" Nahorny) and Ivan "Pedofile" Omelchenko, leads of Ukrainian mafia cartel "Kodlo Gondona Nahornogo" ("SI Trans Group"), who have public record of serial racketeering, child trafficking, unlawful seizure of assets and property, and hostile takeover of businesses using targeted racketeering attacks implemented through fabricated criminal charges using corrupt judges and police officers in court system in both Ukraine and California.

#### **IV. RELIEF REQUESTED**

1. **Accept Removal** and assume jurisdiction over these cases under 28 U.S.C. §§ 1331, 1343, 1443, 1455.
2. **Consolidate All Matters** into a single federal action for review and adjudication.
3. **Immediate Stay of All California Enforcement Actions and Orders** pending federal review.
4. **Remote Proceedings and Video Recording** for all hearings to prevent further judicial fraud on court.
5. **Immediate Return of abducted Child and Release of Funds:**
  - Order the **immediate release and return of Max Mars** to Plaintiff's custody.
  - Authorize **emergency 401(k) withdrawal**.
6. **Dismiss Fabricated Criminal Proceedings & Expunge Records:**
  - **Criminal Case No. B2402220**
  - **Bench warrant** No. 002400020658 (08/21/2024)
  - **Arrest warrant** No. 2400025644 (10/23/2024)
  - **Family bench warrant** (06/17/2024) in case 22FL003144
7. **Vacate Void Orders & Records: 22FL003144 and 22DV000779**, all orders including coerced stipulations (02/08/2023; 01/18/2023), retroactive to 09/13/2022.
8. **Family Relief:** Issue **divorce decree** and **custody restoration** in case No. **22FL003144**.
9. **Return Property: VW Tiguan** (CA plate 7ZND242).
10. **Grant Name Change: 24CV441024**  
Kostiantyn Mars to **Royce Mars**.
11. **Grant Name Changes: 22FL003144**  
Maksym Mars to **Max Mars**,  
Hanna Mars to **Hanna Nahorna**.
12. **Issue Protective SSN/ID (identity-protection relief)**.

## V. CONCLUSION

State actions constitute civil rights deprivations, due process violations, obstruction of justice, denial of access to California courts, and targeted racketeering under color of law. Federal removal is necessary to preserve constitutional rights and provide effective relief.

DATED: January 26, 2026



Royce Mars

## **CIVIL COVER SHEET (JS-44 SUMMARY)**

### **United States District Court Western District of Texas - Austin Division**

#### **I. Jurisdiction:**

- Federal Question (28 U.S.C. §§ 1331, 1343, 1443) - Civil Rights and Constitutional Violations

#### **II. Nature of Suit (Select All That Apply):**

- 440 - Civil Rights: Other (Deprivation of rights under color of state law),
- 530 - Habeas Corpus (Detention/Unlawful Custody),
- 890 - Other Statutory Actions (Emergency federal review / all-writs jurisdiction)

#### **III. Origin:**

- 5 - Removed from State Court (Santa Clara County, CA))

#### **Related State Cases Removed:**

- Case No. B2402220 - Criminal
- Case No. 22DV000779 - Domestic Violence (DVRO)
- Case No. 22FL003144 - Family
- Case No. 24CV441024 - Name Change

#### **IV. Cause of Action:**

Removal under 28 U.S.C. §§ 1441, 1443, 1455, 1651 (systemic due-process/equal-protection denials; unlawful detention; parental rights deprivation by disqualified state actors under color of law).

#### **V. Requested Relief:**

Declaratory and injunctive relief; stay of void orders; immediate federal review and stay of enforcement of void state orders; restoration of custody and constitutional rights.

DATED: January 26, 2026

  
\_\_\_\_\_  
Royce Mars

Notice of Removal & Emergency TRO Package B2402220, 22DV000779,  
22FL003144, 24CV441024

## CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of January, 2026, a true and correct copy of the following documents:

- Notice of Removal,
- Emergency Motion for Temporary Restraining Order (TRO),
- Civil RICO Complaint, and
- Supporting Evidence Exhibits,

were served upon the parties listed below by Certified Mail, Return Receipt Requested, in accordance with Federal Rule of Civil Procedure 5(b)(2)(C) and the Local Rules of the United States District Court for the Western District of Texas.

**Served Parties:**

1. President Donald J. Trump
2. Governor Greg Abbott
3. Governor Gavin Newsom
4. U.S. Attorney General Pam Bondi
5. Deputy Attorney General Todd Blanche
6. Child Protection Division (OJJDP)
7. FBI Director Kash Patel
8. Deputy FBI Director Dan Bongino
9. FBI Crimes Against Children / CARD Unit
10. U.S. Attorney (Western District, TX) Justin Simmons
11. U.S. Attorney (Northern District, CA) Craig H. Missakian
12. Texas Attorney General Ken Paxton
13. California Attorney General Rob Bonta
14. California Chief Justice Patricia Guerrero
15. Chair Lisa B. Lench, CA Commission on Judicial Performance
16. Director Gregory Dresser, CA Commission on Judicial Perf.
17. District Attorney Jeff Rosen, Santa Clara County, CA
18. Presiding Judge Julie Emede, Santa Clara County, CA
19. Clerk of Court, Santa Clara Superior Court, CA
20. Director Kristen Erickson-Donadee, California DCSS
21. Director Ignacio J. Guerrero, Santa Clara DCSS
22. Santa Clara County DCSS, CA - Jessica Tenorio
23. Hanna Mars (Petitioner 22DV000779, 22FL003144, B2402220)
24. Nancy Roberts (Opposing Counsel)

Executed in Texas on January 26, 2026.

DATED: January 26, 2026

  
\_\_\_\_\_  
**Royce Mars**

Notice of Removal & Emergency TRO Package B2402220, 22DV000779,  
22FL003144, 24CV441024