

**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  
WESTERN DISTRICT OF TEXAS  
AUSTIN 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

**Plaintiff/Petitioner:**

Royce Mars

**To:**

The United States District Court  
for the Western District of Texas, Austin 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)

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

### **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" Nahornyy 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 2022-2025, Petitioner was subjected to a coordinated racketeering attack involving unlawful arrests, criminal 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 was 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 criminal charges and 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**

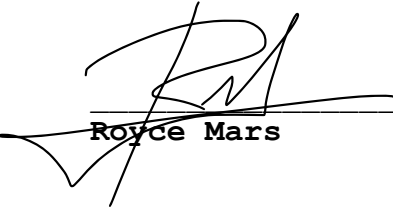
1. **Accept Removal** and assume jurisdiction over these cases under 28 U.S.C. §§ 1331, 1343, 1443, 1455.
2. **Consolidate All Matters** into a single federal action for review and adjudication.
3. **Immediate Stay of All California Enforcement Actions and Orders** pending federal review.
4. **Remote 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)**.

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

## 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

**EMERGENCY MOTION FOR TEMPORARY  
RESTRAINING ORDER (TRO)**

[Filed Pursuant to Fed. R. Civ. P. 65(b)]

**I. INTRODUCTION**

Petitioner Royce Mars respectfully moves this Court for an **Emergency Temporary Restraining Order** under **Federal Rule of Civil Procedure 65(b)** to immediately stay unlawful enforcement actions and irreparable harm pending federal review of Petitioner's Notice of Removal filed under 28 U.S.C. §§ 1331, 1343, 1441, 1443, and 1455.

Petitioner faces imminent and irreparable injury, including the threat of unlawful arrest and incarceration, deprivation of income and property, obstruction of due process, and continuing interference with parental rights arising from void and unconstitutional state-court orders issued by disqualified judicial officers of the Santa Clara County Superior Court.

Plaintiff further seeks emergency relief restoring custody and ordering immediate release of his son, Max Mars, from unlawful detention under void state orders, as documented in Exhibits Set I (Child Custody, Abduction & Danger to Life).

Immediate injunctive relief is required to preserve Plaintiff's constitutional rights, prevent further irreparable harm to Plaintiff and his son Max Mars, and maintain the status quo pending federal adjudication.



## II. FACTUAL BACKGROUND

The removed California cases include:

- B2402220 (Criminal)
- 22DV000779 (Domestic Violence)
- 22FL003144 (Family)
- 24CV441024 (Name Change)

These matters collectively involve violations of federal constitutional rights through acts of judicial racketeering, child trafficking, international child abduction, kidnapping, extortion, unlawful incarceration, denial access to court and obstruction of justice under color of law.

Between 2022 - 2025, a coordinated group of disqualified judges - **Stephen Lowney, Andrea Flint, and James Towery** issued void orders **transferring custody, blocking all contact, and extorting** the child's passport/green card to facilitate **international abduction of Max Mars outside of the United States to Ukraine, therefore executing international child trafficking schema.**

**Arrest** (06/14/2024) and **multiple arrest and bench warrants** were used to enforce the unlawful detention, **silence Petitioner and coerce compliance with legally void orders** issued for criminal purpose of **extortion of documents of Max Mars, coercion to surrender custody rights and to severely injury** Petitioner.

**Flint's** legally void **wage-garnishment orders** caused severe financial damages, and together with **seizure of 401(k), termination of employment, denial of EDD Unemployment benefits** and fabricated **arrest and bench warrants** impose direct threat to Petitioner's life, and directly confirm **weaponization of California courts by homosexual presiding judges Beth McGowen and Julie Emede, and their criminal associates disqualified judges Stephen Lowney, Andrea Flint, James Towery, Thomas Kuhnle, Benjamin Williams, Michael Clark** in implementation of child trafficking schema of international abduction of Petitioner's son Max Mars outside of the United States, and targeted racketeering attack on Petitioner Royce Mars.

### III. RELIEF REQUESTED

Plaintiff respectfully requests that this Court issue an immediate **Temporary Restraining Order staying, enjoining, and prohibiting** the following until full federal review is completed:

1. **All active warrants:**
  - **Arrest Warrant** No. 2400025644 (Oct 23 2024)
  - **Criminal Bench Warrant** No. 002400020658 (Aug 21 2024)
  - **Family Bench Warrant** (June 17 2024) in case 22FL003144
2. **All DVRO enforcement** issued by **disqualified judges Lowney, Flint, and Towery**, including DVRO orders dated
  - DVRO June 17, 2024;
  - DVRO Nov 28, 2023;
  - DVRO Sept 13, 2022;
3. **All enforcement of vexatious-litigant pre-filing order (March 11, 2024)**, issued by **disqualified judge Lowney**.
4. **DCSS wage-garnishment and arrears (Case 200000002626999) and any accruals under void orders in case 22FL003144** (incl. fabricated \$6,895.52 equalizing payment based on falsified bank statements; \$1,500 unsupported debt in Santa Clara County Court).
5. **401(k) freezes; authorize emergency withdrawal.**
6. **All enforcement of fabricated arrears (\$6,895.52 equalizing payment; \$1,500 unsupported debt) and related state enforcement actions.**
7. **Any California enforcement/collection/criminal actions related to these matters.**

#### IV. ADDITIONAL RELIEF REQUESTED

Pending further hearing, Plaintiff also requests that this Court:

1. **Dismiss/nullify all warrants** in cases B2402220 and 22FL003144 listed above.
2. **Stay/dismiss criminal case B2402220** as fabricated and legally defective.
3. **Mandate remote hearings with video recording**, media coverage, and federal oversight on all removed cases.
4. **Restore full custody to Plaintiff**; order immediate release of **Max Mars**; coordinate with USMS/FBI CACU/State Dept for enforcement and **safe transfer of Max Mars to Texas**.
5. **Dismiss coerced stipulations** (02/08/2023; 01/18/2023) and all legally void orders retroactively back to 09/13/2022.
6. **Vacate vexatious litigant order** (03/11/2024); remove Petitioner from California Vex. Lit. registry.
7. **Order EPAM Systems to immediately release Petitioner's 401(k) funds** for emergency hardship withdrawal.
8. **Dismiss all DCSS and Santa Clara County Court arrears** fabricated under void judicial acts, **stop wages garnishment**.
9. **Return VW Tiguan** (7ZND242) to Petitioner.
10. **Finalize divorce (22FL003144), issue divorce decree, and grant name changes for:**
  - Kostiantyn Mars to **Royce Mars** (24CV441024).
  - Maksym Mars to **Max Mars** (22FL003144)
  - Hanna Mars to **Hanna Nahorna** (22FL003144)
11. **Order issuance of new SSN for identity protection.**

## V. LEGAL BASIS

This Motion is supported by:

- Fed. R. Civ. P. 65(b) (TRO).
- 28 U.S.C. §§ 1331, 1343, 1443, 1455, 1651 (Federal civil rights and removal jurisdiction & All Writs).
- 42 U.S.C. § 1983 (Deprivation of rights under color of law)
- The Fourteenth Amendment to the U.S. Constitution (Due Process and Equal Protection)
- ICARA (22 U.S.C. § 9001 et seq.); PKPA (28 U.S.C. § 1738A); UCCJEA (Cal. Fam. Code § 3400 et seq.) - authority for immediate child-return and custody protection.

Petitioner demonstrates irreparable injury, a likelihood of success on the merits, and that the balance of equities and public interest favor immediate injunctive relief.

## **VI. CONCLUSION AND PRAYER FOR RELIEF**

For the foregoing reasons, Petitioner respectfully requests that this Honorable Court:

- GRANT this Emergency Temporary Restraining Order,
- STAY all California enforcement actions listed above,
- ORDER immediate release/return of Max Mars to Plaintiff's custody;
- AUTHORIZE immediate release of Petitioner's 401(k) funds for emergency use,
- ORDER immediate release of Petitioner's 401(k) funds for emergency use,
- SET this matter for preliminary injunction hearing within 14 days with remote appearances and video recording.

Respectfully submitted,

DATED: January 26, 2026

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

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**ROYCE MARS,**  
Plaintiff / Petitioner

v.

**STATE OF CALIFORNIA, et al.,**  
Defendants

Case No. \_\_\_\_\_

**[PROPOSED] ORDER ACCEPTING REMOVAL AND  
CONSOLIDATION**

Upon consideration of the Notice of Removal filed by Petitioner Royce Mars under 28 U.S.C. §§ 1331, 1343, 1367, 1441, 1443, 1455, and 1651, seeking removal of the referenced California cases, and for good cause appearing, IT IS HEREBY ORDERED THAT:

1. The Notice of Removal is ACCEPTED and the removed matters are docketed under the above case number.

2. The following California state cases are hereby removed and consolidated:

- B2402220 (Criminal)
- 22DV000779 (Domestic Violence)
- 22FL003144 (Family)
- 24CV441024 (Name Change)

3. All California enforcement actions, hearings, warrants, and orders relating to these cases are STAYED pending federal review.

4. The Court retains exclusive jurisdiction under 28 U.S.C. §§ 1331, 1343, and 1443 over all constitutional and civil rights claims.

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

5. The Clerk is directed to notify the Santa Clara County Superior Court of this removal and transmit a certified copy of this Order.

6. All future hearings on the consolidated matter shall be conducted remotely via video conference and recorded for the federal record.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_  
Austin, Texas

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**ROYCE MARS,**  
Plaintiff / Petitioner

v.

**STATE OF CALIFORNIA, et al.,**  
Defendants

Case No. \_\_\_\_\_

**[PROPOSED] TEMPORARY RESTRAINING ORDER (TRO)**

Upon consideration of Petitioner's Emergency Motion for Temporary Restraining Order under Fed. R. Civ. P. 65(b), and the Court finding immediate and irreparable harm will result if state enforcement continues before federal review, IT IS HEREBY ORDERED THAT:

1. The State of California, Santa Clara County Superior Court, DCSS, and all associated agents are TEMPORARILY RESTRAINED from enforcing any of the following pending federal review:

- Arrest warrant No. 2400025644 (10/23/2024)
- Criminal bench warrant No. 002400020658 (08/21/2024)
- Family bench warrant (06/17/2024)
- Domestic Violence restraining orders issued by disqualified judges Stephen Lowney, Andrea Flint, and James Towerly
- Vexatious litigant prefiling order (03/11/2024)
- DCSS wages garnishment Case No. 200000002626999
- Any enforcement actions, liens, or holds on Petitioner's 401(k) funds

2. The 401(k) provider shall immediately lift any freeze on Petitioner's account to allow emergency hardship withdrawal.

3. The minor child Max Mars shall be protected from unlawful detention or transfer pending hearing on custody restoration.

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



4. A hearing on preliminary injunction shall be held remotely with video recording within 14 days.

5. This TRO remains in effect until further order of the Court.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_  
Austin, Texas

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

ROYCE MARS,  
Plaintiff / Petitioner

v.

STATE OF CALIFORNIA, et al.,  
Defendants

Case No. \_\_\_\_\_

**[PROPOSED] ORDER FOR CLERK ACTIONS**

The Clerk of the Court is directed to:

1. Open this case as a federal removal matter under 28 U.S.C. §1443 and assign a civil docket number.
2. Transmit certified copies of this Order and Notice of Removal to:
  - Clerk, Santa Clara County Superior Court
  - Santa Clara County District Attorney Jeff Rosen
  - California Attorney General Rob Bonta
  - U.S. Attorney, Western District of Texas Justin Simmons
3. Ensure immediate docketing and routing to a federal magistrate judge for preliminary review under 28 U.S.C. § 1455(b)(4).

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_  
Austin, Texas

\_\_\_\_\_  
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 on this 26th day of January, 2026, in Austin, Texas.

DATED: January 26, 2026

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

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