

**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, killing Hope, Petitioner's mom, theft of \$200,000 under color of law, unlawful incarceration, denial of access to California courts by legally void Vexatious Litigant order signed by disqualified child trafficker and racketeer Stephen Lowney, targeted racketeering attack on Petitioner with unlawful arrests 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" Nahornyy and Ivan "Pedofile" Omelchenko, serial racketeers and leaders of the Ukrainian Mafia Cartel "Kodlo Gondona Nahorno" ("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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**Related Cases Under Federal Removal:**

B2402220 | 22DV000779 | 22FL003144 | 24CV441024

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

**CIVIL RICO COMPLAINT**

(18 U.S.C. §§ 1961-1968; 18 U.S.C. §§ 241, 242, 1341, 1343, rel. prov.)  
Filed under Federal Question Jurisdiction  
(28 U.S.C. §§ 1331, 1333, 1367, 1441, 1443, and 1455)

**ROYCE MARS,**  
Plaintiff,

v.

STATE OF CALIFORNIA; CALIFORNIA JUDICIAL MAFIA CARTEL;  
SANTA CLARA COUNTY SUPERIOR COURT; SANTA CLARA MAFIA CARTEL  
(BBMP - Bench, Bar, Media, Police Criminal Syndicate);  
GAVIN NEWSOM, JOE BIDEN, KAMALA HARRIS, ROB BONTA,  
TANIA SCHRAG, VERONIKA BARSEGUYAN, ESTHER FALLAS,  
JULIE EMEDE, BETH MCGOWEN, THEODORE ZAYNER, PATRICIA MANOUKIAN,  
STEPHEN LOWNEY, ANDREA FLINT, JAMES TOWERY,  
THOMAS KUHNLE, BENJAMIN WILLIAMS, MICHAEL CLARK,  
STEVEN DINNEEN, NANCY ROBERTS, JESSICA TENORIO, JILLIAN LAXTON,  
OFFICERS MARTIN (BADGE #17209) AND MUTIN FROM SUNNYVALE PD,  
MARY ROLISON, JESUS SANTOS, DYLAN SMITH, ESTHER TAYLOR,  
UKRAINIAN MAFIA CARTEL "KODLO GONDONA NAHORNOGO" ("SI TRANS GROUP"),  
SIR GAY "GONDON" NAHORNYY (SERHII "GONDON" NAHORNYY),  
IVAN "PEDOFILE" OMELCHENKO, HANNA "GNYDA" NAHORNA (HANNA "GNYDA" MARS),  
and all related officials and agents acting under color of law,

Defendants / Respondents.

Civil Action No. \_\_\_\_\_

## **I. INTRODUCTION**

1. Plaintiff Royce Mars brings this civil action for damages and equitable relief under the **Racketeer Influenced and Corrupt Organizations Act ("RICO")**, 18 U.S.C. § 1962(a)-(d), and related civil-rights statutes.

2. The Complaint concerns a **coordinated pattern of racketeering activity between 2022 and 2025 carried out under color of California state authority** by members of the Santa Clara County judicial network known as **Santa Clara Mafia Cartel (BBMP - Bench, Bar, Media and Police criminal syndicate)** and their private associates, resulting in:

- Kidnapping and unlawful detention of Plaintiff's son Max Mars,
- Extortion of passport, green card, all documents of Petitioner's kidnapped son Max Mars,
- Killing Hope, Petitioner's mom, 95 years old senior woman with disabilities,
- Unlawful seizure of Petitioner's assets and property, including Petitioner's 401(k), car VW Tiguan, \$200,000 seized through unlawful wages garnishment, fraud on court and extortion orders;
- Unlawful arrest and incarceration of Petitioner,
- Fabricated criminal and civil charges, arrest warrants,
- Obstruction of federal constitutional rights to due process and access to court.

## **II. JURISDICTION AND VENUE**

3. This Court has subject-matter jurisdiction under 28 U.S.C. § 1331 (federal question) and 18 U.S.C. § 1964(c) (civil RICO).

4. Supplemental jurisdiction exists under 28 U.S.C. § 1337 for related state-law claims.

5. Venue is proper in the Western District of Texas because Plaintiff resides in Austin, Texas, and substantial effects of Defendants' racketeering conduct continue to harm Plaintiff here.

### III. THE CRIMINAL ENTERPRISE

6. Defendants formed and participated in an **association-in-fact enterprise (the California Judicial Mafia Cartel, Santa Clara Mafia Cartel, known as BBMP - Bench, Bar, Media and Police criminal syndicate)**, consisting of certain California judges, including **homosexual presiding judges (Julie Emede, Beth McGowen, Theodore Zayner) biased in favor of homosexual pedofiles kidnappers**, disqualified family court judges (Stephen Lowney, Andrea Flint, James Towery), criminal court judges racketeers (Thomas Kuhnle, Benjamin Williams, Michael Clark), corrupt police officers racketeers (Martin and Mutin, Sunnyvale PD), attorneys (Steven Dinneen, Nancy Roberts), state officials (Governor Gavin Newsom, Attorney General Rob Bonta), and **foreign associates including organized criminal group of aggressive Ukrainian homosexual pedofiles Sir Gay "Gondon" Nahornyy (Serhii "Gondon" Nahornyy), Ivan "Pedofile" Omelchenko - leaders of Ukrainian Mafia Cartel "Kodlo Gondona Nahornogo" ("SI Trans Group")**, who have documented history of racketeering, child trafficking, money laundering, extortion, unlawful seizure of assets and property, hostile takeover of businesses from their partner Serhii Rybalko through fabricated arrest warrants and criminal charges, fabricated by corrupt Ukrainian and California judges and police officers.

7. **Purpose of the enterprise:** to extort money and property, traffic Petitioner's son Max Mars outside of the United States to Ukraine into custody of Sir Gay "Gondon" Nahornyy (Serhii "Gondon" Nahornyy), his criminal associate Ivan "Pedofile" Omelchenko and daughter of Gondon Nahornyy, Hanna "Gnyda" Nahorna (Hanna Mars), and to conceal judicial corruption by using California courts as weaponized racketeering instruments.

8. **Means and methods:** kidnapping, murder, extortion, coercion, unlawful arrests, threats of incarceration, fabrication of criminal records, bribery, fraud upon the court, fabrication of orders, targeted racketeering attacks, denial of access to California courts, and obstruction of federal proceedings.

#### **IV. PREDICATE ACTS OF RACKETEERING**

Each of the following constitutes a predicate act under 18 U.S.C. § 1961(1):

1. **Bribery & Extortion (18 U.S.C. §§ 1951, 201):** Judge Stephen Lowney allegedly accepted bribes from aggressive Ukrainian homosexual pedofiles Sir Gay "Gondon" Nahornyy (Serhii "Gondon" Nahornyy) and Ivan "Pedofile" Omelchenko, and during the 2/7/2024 hearing was using threats of unlawful incarceration to extort from Plaintiff Royce Mars his son's Max Mars passport, green card, and identity documents to facilitate **child trafficking schema of international abduction of Max Mars outside of the United States to Ukraine** into custody of Sir Gay "Gondon" Nahornyy, Ivan "Pedofile" Omelchenko and daughter of Gondon Nahornyy, Hanna "Gnyda" Nahorna (Hanna Mars).
2. **Obstruction of Justice (18 U.S.C. § 1503):** Disqualified judges Stephen Lowney, Andrea Flint, and James Towery continued adjudicating case 22FL003144 after lawful disqualifications of them; while presiding judge Beth McGowen concealed their disqualifications and refused to remove Lowney, Flint and Towery from the case 22FL003144 despite publicly exposed and undeniable conflict of interest, and direct threats of malicious prosecution from Stephen Lowney and Andrea Flint reported to Beth McGowen.
3. **Kidnapping & Child Trafficking (18 U.S.C. § 1201):** Defendants jointly facilitated kidnapping of Petitioner's son Max Mars, are unlawfully holding Max Mars hostage without right for a contact or access to phone and internet, blocked all parental contact under legally void restraining orders, with the purpose of coercion to surrender custody rights and facilitation of international child trafficking of Max Mars outside of the United States to Ukraine into custody of aggressive Ukrainian homosexual pedophile Sir Gay "Gondon" Nahornyy, Ivan "Pedofile" Omelchenko and daughter of Gondon Nahornyy, Hanna "Gnyda" Nahorna (Hanna Mars).
4. **Wire Fraud (18 U.S.C. § 1343):** Transmission of falsified financial documents by attorney Nancy Roberts to support unlawful extortion orders, and wage-garnishment by DCSS.

5. **Mail Fraud (18 U.S.C. § 1341):** Use of postal mail to deliver fraudulent court orders and wage-garnishment notices across state lines.
6. **Money Laundering (18 U.S.C. § 1956):** Transfer of funds extorted through DCSS to private accounts connected with the enterprise.
7. **Retaliation Against Witness (18 U.S.C. § 1513):** Unlawful arrests, issuance of arrest and bench warrants after Plaintiff filed federal complaints and judicial-disqualification statements.

These acts form a **continuous pattern of racketeering spanning multiple years and entities.**

## V. INJURY TO PLAINTIFF

1. **Loss of custody** and companionship of minor child Max Mars.
2. **Unlawful seizure of approximately \$200,000 in assets** (401(k), wages garnishment, vehicle VW Tiguan, theft by Steven Dinneen, Mary Rolison, and paid supervisors).
3. **Destruction of employment and professional reputation.**
4. **Severe emotional distress and physical-security risks** due to unlawful arrests and ongoing unlawful arrest warrants.

## **VI. CAUSES OF ACTION**

### **Count I - RICO § 1962(c): Conduct of Enterprise Through Pattern of Racketeering**

Defendants, through their positions in the enterprise, conducted or participated in the affairs of the enterprise through the predicate acts listed above.

### **Count II - RICO § 1962(d): Conspiracy**

Each Defendant conspired to further the racketeering enterprise by agreeing to its objectives and committing overt acts in furtherance of it.

### **Count III - Deprivation of Civil Rights (42 U.S.C. § 1983)**

Defendants acting under color of state law deprived Plaintiff of constitutional rights to due process, equal protection, and access to court.

### **Count IV - Obstruction of Justice (18 U.S.C. § 1503 et seq.)**

Defendants interfered with Plaintiff's access to federal review and concealed judicial disqualifications to obstruct justice.

## **VII. PRAYER FOR RELIEF**

Plaintiff respectfully requests that this Court:

1. **Enter judgment in favor of Plaintiff** and against all Defendants, jointly and severally;
2. **Award treble damages** under 18 U.S.C. § 1964(c);
3. **Order restitution of all unlawfully seized assets and property;**
4. **Declare void and enjoin enforcement of all orders issued by disqualified judges** in cases 22FL003144, 22DV000779, and B2402220;
5. **Order immediate release and restoration of custody of Petitioner's son Max Mars;**
6. **Refer evidence of criminal conduct to appropriate federal prosecutors;**
7. **Grant any further relief** the Court deems just and proper.

## **VIII. EXHIBIT INDEX (Attached Separately)**

Exhibit Sets 1 - 10 as listed in "Evidence Index for Civil RICO Complaint" (filed concurrently).

Respectfully submitted,

DATED: November 20, 2025



Royce Mars

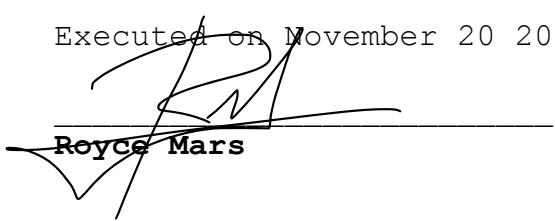
A handwritten signature in black ink, appearing to read "RM". Below the signature, the name "Royce Mars" is printed in a smaller, sans-serif font.

## **DECLARATION OF ROYCE MARS UNDER 28 U.S.C. § 1746**

I, Royce Mars, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am the Plaintiff in the foregoing Civil RICO Complaint.
2. I have personal knowledge of the facts stated therein except where based on information and belief, and as to those matters I believe them to be true.
3. All documents, recordings, transcripts, letters, and exhibits referenced in the accompanying Exhibit Index (Exhibits A through Q) are authentic copies of materials created, received, or filed by me, or obtained from official sources.
4. The statements regarding acts by Defendants—including bribery, aggravated kidnapping, child trafficking, extortion, racketeering, grand theft under color of law, systemic obstruction of justice, unlawful arrests and malicious prosecution, denial of access to court, and deprivation of constitutional rights — are based on direct participation, court records, witness statements, and contemporaneous recordings in my possession.
5. I submit this declaration in support of my Civil RICO Complaint and Notice of Removal to the United States District Court for the Western District of Texas, Austin Division.

Executed on November 20 2025, in Austin, Texas.



Royce Mars