

**ROYCE MARS**

*[Legal name: Kostiantyn Mars - Name change petition denied in California due to systemic obstruction of justice and denial of access to California courts after aggravated kidnapping of Petitioner's son Max Mars with purpose of extortion of money and documents, international abduction of Max Mars outside of the United States, killing Hope, Petitioner's mom, theft of \$200,000 by DCSS official Jessica Tenorio via unwarranted DCSS wages garnishment, unlawful incarceration of Petitioner, denial of access to California courts by void Vexatious Litigant order signed by child trafficker Stephen Lowney acting outside jurisdiction after his disqualification, targeted racketeering attack on Petitioner with unlawful arrests, bench warrants and denial of access to California courts by criminals from Gavin Newsom's Child Trafficking California Mafia Cartel and Beth McGowen / Julie Emede Homosexual Child Trafficking Santa Clara Mafia Cartel, acting together with criminal associates Sir Gay "Gondon" Nahorny (Serhii "Gondon" Nahorny) and Ivan "Pedofile" Omelchenko from Ukraine Cartel "Kodlo Gondona Nahornogo" ("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**

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

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

**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.

**GAVIN NEWSOM'S CHILD TRAFFICKING CALIFORNIA MAFIA CARTEL;  
BETH MCGOWEN & JULIE EMEDE CHILD TRAFFICKING SANTA CLARA MAFIA CARTEL  
(BBMP - Bench, Bar, Media, and Police Criminal Syndicate);  
STATE OF CALIFORNIA;  
SANTA CLARA COUNTY SUPERIOR COURT;  
HANNA MARS (Petitioner in Cases No. 22DV000779, 22FL003144, B2402220);  
and all related officials and agents acting under color of law,  
Defendants / Respondents.**

**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 - 2026, 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 20000002626999) 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: February 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.
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 Towery
- 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.

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