
SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF NEW YORK

**JOMO M. WILLIAMS,
Plaintiff,**

-against-

**DONALD TRUMP, et al.,
Defendants.**

Index No.: 155472/2025

ORDER TO SHOW CAUSE

Upon the Affirmation of Jomo M. Williams, sworn to on September 19, 2025, and the Memorandum of Law in support thereof, it is hereby

ORDERED, that the defendants, Donald Trump, and all persons, agents, employees, and entities under his control, show cause before this Court, at the courthouse located at 60 Centre Street, New York, New York, on the [] day of [], 2025, at [] or as soon thereafter as counsel may be heard, why an Order should not be granted:

- 1. Granting leave to renew and reargue the Court's prior determination, dated [9/03/2025], pursuant to CPLR § 2221(e);**
- 2. Upon renewal and reargument, vacating and/or modifying said prior order in light of new facts and a significant change in law,**

including the U.S. Supreme Court's ruling in *Noem v. Vasquez Perdomo*, 606 U.S. __ (2025);

3. Declaring that the defendants' threats and actions—including threats of federal troop and agent deployments for politically motivated purposes—constitute violations of New York Election Law (ELN §§ 17-152, 17-212, 17-216), and the New York State Constitution, Article I, §§ 11 and 12;
4. Issuing preliminary and permanent injunctive relief prohibiting defendants from deploying federal troops or federal law enforcement agents, including but not limited to ICE, to New York State in furtherance of a policy of political persecution, voter intimidation, or selective enforcement;
5. Declaring that the threats of federal overreach and politically motivated selective enforcement constitute an “imminent Danger as will not admit of delay” under U.S. Constitution, Article I, Section 10, Clause 3, thereby justifying New York's entry into a multi-state compact to form a Department of Peace without congressional consent;
6. Recognizing and applying the Independent and Adequate State Grounds Doctrine, by which New York courts are empowered to interpret their Constitution as providing broader protections than the federal Constitution, thereby serving as a “slender shield” against federal overreach;
7. Declaring that under this doctrine, New York's Constitution expressly rejects certain federal doctrines, including the “open fields” doctrine (*People v. Scott*, 79 N.Y.2d 474 [1992]), and that state courts may interpret their constitutions to provide greater protections than the federal baseline (*Pruneyard Shopping Center v. Robins*, 447 U.S. 74 [1980]);

8. Declaring that selective federal enforcement based on political affiliation, race, ethnicity, or language constitutes an unconstitutional denial of due process, equal protection, and search and seizure protections under the New York State Constitution, which has consistently been interpreted to afford greater safeguards than the federal baseline (see *People v. P.J. Video*, 68 N.Y.2d 296 [1986]; *People v. Scott*, 79 N.Y.2d 474 [1992]; *People v. Weaver*, 12 N.Y.3d 433 [2009]). Such protections operate as a “slender shield” against federal overreach, and may not be diminished by reliance on federal doctrines or the permissive standards endorsed in *Noem v. Vasquez Perdomo*;
9. Ordering remedial measures, modeled after judicial remedies in *Floyd v. City of New York*, 959 F. Supp. 2d 540 (S.D.N.Y. 2013), including but not limited to:
 - court-appointed monitors to oversee compliance;
 - community-based remedial processes; and
 - pilot programs requiring body-worn cameras for federal law enforcement operating in New York, should any deployment occur;
10. Granting such other and further relief as this Court deems just and proper.

AND IT IS FURTHER ORDERED, that pending the hearing of this motion, the defendants are hereby **TEMPORARILY RESTRAINED** from deploying federal National Guard troops or federal law enforcement agencies, including ICE, to the State of New York in furtherance of a policy of politically motivated immigration enforcement or selective

law enforcement targeting New York City or its residents. This temporary restraining order is necessary to prevent immediate and irreparable harm to the elective franchise and to the rights of New York citizens.

AND IT IS FURTHER ORDERED, that service of this Order to Show Cause and the papers upon which it is granted shall be made by [EMAIL AND CPLR 2103(d) or as directed by the Court] on or before [____], 2025, upon the defendants' counsel of record, or, if none, upon the defendants themselves, and such service shall be deemed good and sufficient.

Dated: September ____, 2025
New York, New York

ENTER:

HON. CAROL SHARPE, J.S.C.

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

JOMO M WILLIAMS,

Plaintiff,

-against-

DONALD TRUMP, et al.,

Defendants.

ORDER TO SHOW CAUSE

Index No.: 155472/2025

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ORDERED, that the defendants, Donald Trump, and all persons, agents, employees, and entities under his control, show cause before this Court, at the courthouse located at 60 Centre Street, New York, New York, on the [] day of [], 2025, at [] or as soon thereafter as counsel may be heard, why an Order should not be granted:

1. Granting leave to renew and reargue the Court's prior determination, dated [9/03/23], pursuant to CPLR § 2221(e);
2. Upon renewal and reargument, vacating and/or modifying said prior order in light of a change in law and new facts;
3. Granting a declaratory judgment that the defendants' actions, including threats of federal troop and agent deployments for politically motivated purposes, constitute a violation of New York Consolidated Laws, Election Law - ELN § 17, and the New York State Constitution, Article I, §§ 11 and 12;

4. Issuing a preliminary and permanent injunction prohibiting defendants from deploying federal troops or law enforcement agents, including but not limited to ICE, to New York State in furtherance of a policy of political persecution or selective enforcement;
5. Declaring that the threats of federal overreach and politically motivated selective enforcement constitute an "imminent Danger as will not admit of delay," under U.S. Constitution, Article I, Section 10, Clause 3, thereby justifying New York's entry into a multi-state compact to form a Department of Peace without congressional consent; and
6. Granting such other and further relief as this Court deems just and proper.

AND IT IS FURTHER ORDERED, that pending the hearing of this motion, the defendants are hereby TEMPORARILY RESTRAINED from deploying federal National Guard troops or federal law enforcement agencies, including ICE, to the State of New York in furtherance of a policy of politically-motivated immigration enforcement or selective law enforcement targeting New York City or its residents. This temporary restraining order is necessary to prevent immediate and irreparable harm to the elective franchise and to the rights of New York citizens.

AND IT IS FURTHER ORDERED, that service of this Order to Show Cause and the papers upon which it is granted shall be made by [EMAIL AND CPLR 2103 (D) or as directed by the Court] on or before [____], 2025, upon the defendants' counsel of record, or, if none, upon the defendants themselves, and such service shall be deemed good and sufficient.

Dated: September _____, 2025
New York, New York
ENTER:

HON. CAROL SHARPE, J.S.C.

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK**

JOMO M WILLIAMS,

Plaintiff,

-against-

DONALD TRUMP, et al.,

Defendants.

AFFIRMATION IN SUPPORT OF ORDER TO SHOW CAUSE

Index No.: 155472/2025

JOMO M WILLIAMS, the Plaintiff in the above-entitled action, affirms and declares under the penalties of perjury that the following is true and correct:

1. I am the plaintiff in this action, a citizen and resident of the State of New York, and a registered candidate for New York City Council in the November 4, 2025 General Election. I am a person whose legal rights, including the right to a free and fair election, are directly affected by the events and policies at issue.
2. I make this affirmation in support of the annexed Order to Show Cause for leave to renew and reargue this Court's prior order dated [9/03/2025]. My original complaint was timely filed in this Court.
3. Commencing papers were duly served upon all defendants in accordance with this Court's initial order and the New York Civil Practice Law and Rules, thereby vesting this Court with personal jurisdiction over all named defendants.

4. **This motion is required due to new facts and a significant change in federal law that could not have been foreseen at the time of my original complaint or the Court's prior determination.**
5. Since the initial filing, the U.S. Supreme Court has issued an emergency ruling in *Noem v. Vasquez Perdomo*, 606 U.S. ____ (2025), which has been widely reported as granting federal agents the authority to use factors such as ethnicity and language in a "totality of the circumstances" inquiry for immigration enforcement.
6. Concurrently, in August and September 2025, President Donald Trump and his administration have made public statements threatening to deploy federal National Guard and ICE agents to New York City as part of a campaign of increased immigration enforcement in major U.S. cities. These threats have been directed specifically at Democrat-led locations and their residents.
7. No Where in the Noem decision, does it read that it could be utilized as a tool by a member and/or de facto leader of a Political Party, to selectively enforce, politically persecute, identify, and/or target opposing political parties, their Cities, or members.
8. Some news reports in relation to the current 2025 (yr) Political Persecutions, Selective enforcements, and Proofilings are:
 - "Trump is almost certain to face legal challenges if he...send National Guard troops from Republican-led states into Democratic strongholds." (Reuters.com; By Idrees Ali, Phil Stewart and Nandita Bose, September 2, 2025);
 - "Trump has signaled he may extend similar measures to other Democratic-led cities, naming Chicago, New York, Los Angeles, Philadelphia, and Baltimore as potential targets for federal deployments." (Newsweek.com; Aug 11, 2025, By Jason Lemon and Jesus Mesa);
 - "...he has spoken of deploying the Guard in other cities led by Democrats, including Chicago, Baltimore, San Francisco and New York." (NYTimes.com; By Chris Cameron, Reporting from Washington, Aug. 26, 2025)
9. These new facts are not just political rhetoric; they have been acted upon. In recent weeks, ICE raids have occurred in New York State,

and federal agents have been deployed to cities like Democrat Mayoral led Memphis, Tennessee, following similar threats.

10. New York City has already responded by filing its own lawsuit to stop ICE arrests at courthouses. Governor Hochul and other state officials have publicly condemned these actions, recognizing them as a threat to New York's sovereignty and its residents' safety.
11. As a candidate in the upcoming election, I have a direct and tangible interest in ensuring that the electoral process is not corrupted by federal intimidation. The threats of targeted federal enforcement are designed to suppress voter turnout and intimidate specific demographics, thereby interfering with my campaign and the rights of all New York voters.
12. The issuance of a temporary restraining order is critical. Absent an order, the defendants are likely to proceed with their threatened deployments, causing immediate and irreparable harm to the residents of New York City and undermining the integrity of the November 4, 2025 election. The harm is irreparable because it would violate fundamental constitutional rights and cannot be undone by monetary damages.

WHEREFORE, I respectfully request that this Court grant the annexed Order to Show Cause and the relief requested therein.

I affirm this 23 day of September, 2025, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.

New York, New York

Jomo Williams

/s/ Jomo M Williams

JOMO M WILLIAMS, Pro Se

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

JOMO M WILLIAMS,

Plaintiff,

-against-

DONALD TRUMP, et al.,

Defendants.

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S ORDER TO
SHOW CAUSE**

Index No.: 155472/2025

I. PRELIMINARY STATEMENT

Plaintiff Jomo M WILLIAMS, a New York citizen, resident, and candidate for City Council, submits this Memorandum of Law in support of his Order to Show Cause. The defendants' recent actions and public threats constitute a direct and imminent danger to the elective franchise in New York. This Court is not only authorized but legally mandated to intervene on an expedited basis to protect its citizens and the integrity of the upcoming election. The recent federal legal and political developments, including the SCOTUS ruling in *Noem v. Vasquez Perdomo* and the defendants' subsequent threats of politically motivated selective enforcement, are an unprecedented attack on New York's constitutional sovereignty and a clear violation of its election laws.

II. JURISDICTION AND TIMELINESS

This Court has full and proper jurisdiction over this matter. **New York Consolidated Laws, Election Law - ELN § 16-100** explicitly vests the Supreme Court with the authority to "summarily determine any question of law or fact arising as to any subject set forth in this article, which shall be construed liberally." This action, which concerns the integrity of the electoral process, falls squarely within this Court's purview.

Furthermore, the defendants' failure to remove this case to federal court within the statutory 30-day limit under 28 U.S.C. § 1446(b) constitutes a waiver of that right. The original complaint itself was sufficient to place the defendants on notice of the state-level action, and the new facts only provide further evidence for the original claims.

III. ARGUMENT

A. NEW YORK ELECTION LAW MANDATES EXPEDITED JUDICIAL PROCEEDINGS

The plaintiff is a voter, and duly registered candidate for New York City Council in the November 4, 2025 General Election. The defendants' actions directly affect this election, bringing this case squarely within the purview of **New York Consolidated Laws, Election Law - ELN § 17-216**.

This statute mandates an **automatic calendar preference** and **expedited pretrial and trial proceedings** for actions alleging a violation of this title. The law explicitly requires this Court to grant preliminary relief if it finds that: **(a) plaintiffs are more likely than not to succeed on the merits; and (b) it is possible to implement an appropriate remedy that would resolve the alleged violation in the upcoming election.** Both of these criteria are met here.

B. PLAINTIFF IS LIKELY TO SUCCEED ON THE MERITS UNDER NYS ELECTION LAW

The defendants' threats to deploy federal agents and troops to New York City for the purpose of politically motivated immigration enforcement constitute a direct violation of New York State law.

- **ELN § 17-212 (Prohibition against voter intimidation, deception or obstruction)**: This statute is explicitly broad, applying to "**any person, whether acting under color of law or otherwise.**" It prohibits acts of "**intimidation, deception, or obstruction that affects the right of voters to access the elective franchise.**" The defendants' public threats, reported widely in August and September 2025, are designed to instill fear in a specific demographic, which has the "reasonable effect of causing any person to vote or refrain from voting... for or against any particular person." These actions are a clear attempt to suppress voter turnout and violate the law. Federal officers are not exempt from this statute; by threatening to use their official capacity for political retribution, they are acting "under color of law" to violate the civil rights of New York residents.
- **ELN § 17-152 (Conspiracy to promote or prevent election)**: The documented effort by the defendants to target Democrat-led cities, including New York, with a policy of "strict enforcement" constitutes a **conspiracy to prevent an election by unlawful means**. The unlawful means are the politically motivated use of federal law enforcement to intimidate voters. The authority granted by *Noem* serves as the instrument for this conspiracy, not a part of the conspiracy itself.

C. THE INDEPENDENT AND ADEQUATE STATE GROUNDS DOCTRINE

This Court must exercise its authority under the **Independent and Adequate State Grounds Doctrine**, which provides New York courts with the power to interpret their own constitution to provide more expansive rights than the federal one. This principle is a "slender shield" against federal overreach.

- **NYS Constitution, Article I, § 12 (Search and Seizure)**: The New York Court of Appeals has repeatedly held that this provision provides a higher degree of protection than the Fourth Amendment. See *People v. P.J. Video, Inc.*, 68 N.Y.2d 296 (1986) (requiring more exacting standards for warrants involving expressive materials);

People v. Scott, 79 N.Y.2d 474 (1992) (rejecting the federal “open fields” doctrine under the State Constitution); and People v. Weaver, 12 N.Y.3d 433 (2009) (finding warrantless GPS surveillance unconstitutional under Article I, § 12 even where federal law might permit it). This interpretive tradition parallels the broader trend of state constitutionalism recognized in Pruneyard Shopping Center v. Robins, 447 U.S. 74 (1980), where the U.S. Supreme Court affirmed the authority of state courts to interpret their constitutions as providing greater protections than the federal baseline. Collectively, these cases underscore that New York courts construe their search-and-seizure provision more broadly than the federal Fourth Amendment. By contrast, the federal approach reflected in Vasquez Perdomo v. Noem, No. 25-4312 (9th Cir. Aug. 1, 2025), stay granted, 25A169 (U.S. Sept. 8, 2025), which permitted consideration of race, language, and location in law-enforcement stops, directly conflicts with New York’s established jurisprudence affording greater protection against such practices. The federal standard from Noem, which permits profiling based on ethnicity and language, directly contradicts this established state jurisprudence.

- **The Broader Harm of Indiscriminate Enforcement:** The “totality of the circumstances” standard endorsed by Noem has a direct and chilling effect on New York’s diverse population. This loose restriction has the potential to catch U.S. citizens and documented immigrants in the crosshairs of arrests and detentions based on their apparent ethnicity, low-wage jobs, and the language they speak. The defendants’ policies constitute **selective enforcement** based on political affiliation, race, and ethnicity. **Targeting Latinos today, and potentially other groups from Africa, Haiti, Asia, or the Middle East et al. tomorrow—applying the loose Noem standards—creates a widespread and ongoing threat to the civil rights of all New Yorkers.** This Court, guided by the principles of the State Constitution, must recognize this threat and act to protect its residents from unconstitutional profiling.
- It is easy to deduce and foresee the wholesale infringement upon citizens rights, as the purpose (ispo facto) of the ICE stop and

interrogation process (put in question within the NOEM case) is for the Federal Agents to stop an unknown person (undocumented or citizen) utilizing the Noem standard and inquire into his or her citizenship status

D. THE DENIAL OF DUE PROCESS AND FUNDAMENTAL RIGHTS

Further, ICE agents are still denying arrestees due process, thus depriving them of the opportunity to prove their citizenship. This practice, in conjunction with the loose Noem standards, creates a dangerous and legally indefensible "slippery slope" that enables unethical and clandestine practices.

The defendants are engaged in a systematic effort to circumvent due process, a right that the Supreme Court has consistently affirmed applies to all individuals in the United States, including non-citizens. This is evidenced by a pattern of recent policies and actions, including:

- The expansion of **expedited removal** (effective January 21, 2025), which allows for the rapid deportation of individuals without a full hearing.
- A policy change in July 2025 that **restricts bond access** for many individuals in detention, eliminating their opportunity to seek release from an immigration judge.
- Reports that agents are **ignoring or failing to verify claims of U.S. citizenship**, leading to wrongful detention.
- The use of **deceptive tactics** during arrests to gain entry to homes without a judicial warrant.
- Policies threatening **sanctions against attorneys** who vigorously defend their clients, creating a chilling effect and undermining access to legal assistance.
- President Nayib Bukele of El Salvador posted on social media, "Oopsie ... Too late." to the Federal Judge order to return the person (It took a very enormous amount of public outcry, protests, news outlet reporting, and length of time to reverse the

just said contumacious mockery, toying, and public spat towards the courts' face).

The current actions by ICE are seen as eroding fundamental protections that ensure fair treatment under the law. Without an immediate remedy, this formula could lead to a system of extralegal and unconstitutional **exile**, whereby U.S. citizens and residents are subject to unlawful removal to foreign (colony) detention facilities, such as the **Center for the Confinement of Terrorism (CECOT)**, with no remedy to prove their citizenship and return. This would place them in a state of excommunicado and subject them to inhumane conditions, away from all their loved ones and legal assistance.

E. THE *NOEM* STANDARD AND THE UNCONSTITUTIONAL PRACTICE OF STOP AND FRISK

The defendants' reliance on the permissive standards of the *Noem* ruling to conduct immigration enforcement in New York City is particularly egregious given the state's well-established constitutional jurisprudence. This Court has already found similar practices to be unconstitutional.

The **Fourth Amendment** protects individuals from unreasonable searches and seizures, a right that New York's **Article I, Section 12** has been interpreted to protect even more expansively. The NYPD's historical "stop-and-frisk" policy, which allowed officers to stop, question, and frisk individuals on a lower standard of suspicion, was found to violate both the Fourth and Fourteenth Amendments. In the landmark case of *Floyd v. City of New York*, a federal court ruled in 2013 that the policy was unconstitutional because it was carried out in a racially discriminatory manner and disproportionately targeted Black and Brown men. The court found that this practice created a significant "human toll" and violated fundamental rights.

Remedies:

The court ordered a series of reforms, including a court-appointed monitor to oversee the changes, community-based remedial processes, and a pilot program

for body-worn cameras on officers. The Floyd case, filed in 2008, stems from the earlier racial profiling case, Daniels, et al. v. City of New York, et al. that led to the disbanding of the infamous Street Crime Unit and a settlement with the City in 2003. (Note: I cite Federal cases as only persuasive to avoid interfering with THE INDEPENDENT AND ADEQUATE STATE GROUNDS DOCTRINE review herein).

The Noem standard, as it is being applied by the defendants, is the legal equivalent of the very stop-and-frisk policy that was found unconstitutional. It encourages the detention of individuals based on their race, appearance, language, and other factors that have no bearing on a person's legal status. The defendant's claim that there is no data on the number of citizens caught up in this dragnet is a tacit admission that the practice is not just legally questionable, but also systematically unaccountable. According to a 2021 Government Accountability Office (GAO) report, ICE and Customs and Border Protection (CBP) do not keep adequate records, and between 2015 and 2020 alone, at least 70 potential citizens were deported and 121 were detained. This lack of transparency and data collection is a direct violation of due process and a clear attempt to obscure the full extent of the constitutional harm being committed.

F. U.S. CONST. ART. I, § 10, CL. 3: IMMINENT DANGER AND STATE SOVEREIGNTY

The defendants' documented actions and threats to use federal power to undermine state sovereignty and persecute residents constitute a constitutional crisis. These actions create an **"imminent Danger as will not admit of delay"** under the **U.S. Constitution, Article I, Section 10, Clause 3**. This constitutional authority is further reinforced by the **Tenth Amendment**, which reserves to the states all powers not delegated to the federal government.

This "unless" clause is not a source of federal power or a basis for federal question jurisdiction. Instead, it is a **provision for state self-determination**, explicitly recognizing the inherent authority of a state

to act in its own defense in the face of an existential threat that is "so imminent as will not admit of delay." The federal government's actions, and the defendants' threats, are not merely a political dispute; they are a threat of targeted selective enforcement that would, if carried out, undermine the very fabric of state law and civil society. This is a matter of state self-preservation, and the Constitution empowers the state to act.

This Court, therefore, does not need to decide a "federal question." Instead, it must determine whether the defendants' actions meet the high legal bar of "imminent danger" under a constitutional provision that, in this specific context, vests power in the states, not the federal government. The state's response, including the formation of a multi-state compact (E.g.: see Exhibit A) is a defensive measure authorized by this provision.

IV. CONCLUSION

For all the foregoing reasons, Plaintiff respectfully requests that this Court grant this Order to Show Cause and, pursuant to the mandatory directives of **New York Consolidated Laws, Election Law - ELN § 17-216**, grant all requested relief on an expedited basis, including a temporary restraining order and a permanent injunction; et.al. relief deemed just & fit.

Dated: September 19, 2025

New York, New York

Respectfully Submitted,

/s/ Jomo M Williams

JOMO M WILLIAMS, Pro Se

Note: I incorporate my data compilations found on

<https://manualwilliams.com/f/trump-admin-is-eyeing-tennessee-red-state-to-send-troops>

<https://manualwilliams.com/f/supreme-court-ruled-racial-profiling-latinos-is-legal>

Emergency Multi State Dept. Of Peace Compact

(In Response to Department of War)

De-escalation Declaration

SANCTUARY STATES SITTING DUCK COMPACT

..State shall, ...lay any Duty of Tonnage, keep Troops, or Ships of War or enter into any Agreement or **Compact with another State**, or with a foreign Power, or engage in War, [when] actually invaded, or in such **imminent Danger** as will not admit of delay.

We found that Federal Overreach has threatened the peace of this state's union. That the Federal government is no longer acting in the best interest of the Nation in a whole, but under the agenda of Project 2025, Which aims to target particular Sanctuary States, groups, races, and political opponents, all in violation of the U.S. Constitution. 14 Amendment.

Thus the Sanctuary States must form union against dictatorship and tyranny to protect our interests and defend our existence, Therefore our National Guards will be ordered not to be Federalized and not to obey or adhere to no other orders than orders from the executives of this instant compact to defend the existence of the States of this same compact.

Signed by the Executives of _____, _____, _____, _____,
_____, _____, _____, _____, _____, _____,
_____, _____, _____, _____, _____, _____,
_____, and the District of Columbia.

_____ Governor of	_____ Governor of
_____ Governor of.	_____ Governor of
_____ Governor of	_____ Governor of
_____ Governor of.	_____ Governor of
_____ Governor of	_____ Governor of
_____ Governor of.	_____ Governor of
_____ Governor of	_____ Governor of
_____ Governor of.	_____ Governor of
_____ Commanding General of the D.C	

By JKMW

BLK Militant Repub

Keep the Peace, Stay Woke!

SANCTUARY STATES SITTING DUCK COMPACT

Whereas, the Constitution of the United States provides that:

“No State shall, without the Consent of Congress, lay any Duty of Tonnage, keep Troops, or Ships of War in time of Peace, enter into any Agreement or Compact with another State, or with a foreign Power, or engage in War, **unless** actually invaded, **or** in such imminent Danger as will not admit of delay.”

Whereas, we find that federal overreach has endangered the peace, security, and stability of this Union, and that the federal government is no longer acting in the best interests of the nation as a whole but instead advancing an agenda—most notably under *Project 2025*—which seeks to target Sanctuary States, protected groups, racial minorities, and political opponents, all in violation of the Fourteenth Amendment and core constitutional guarantees.

Therefore, the undersigned Sanctuary States declare:

1. That the States party to this Compact shall unite in common defense against dictatorship, tyranny, and unconstitutional encroachment.
2. That each State's National Guard shall remain under the sole command of its Governor and shall not be federalized, except by the lawful consent of the State.
3. That the Guard and other state defense resources shall obey no orders other than those lawfully issued by the Executives of the States bound by this Compact.
4. That the purpose of this Compact is to defend the existence, security, and self-determination of the States signatory hereto.

In witness whereof, the undersigned Executives of _____, _____,
_____, _____, _____, _____, _____,
_____, _____, _____, _____, _____, _____,
_____, _____, _____, and the District of Columbia have hereunto set
their hands and seals:

_____ Governor of _____	_____ Governor of _____
_____ Governor of _____	_____ Governor of _____
_____ Governor of _____	_____ Governor of _____
_____ Governor of _____	_____ Governor of _____
_____ Governor of _____	_____ Governor of _____
_____ Governor of _____	_____ Governor of _____
_____ Governor of _____	_____ Governor of _____
_____ Governor of _____	
_____ Commanding General of the District of Columbia	

SANCTUARY STATES DEFENSE COMPACT

Preamble

Pursuant to the authority reserved to the States under the United States Constitution, and recognizing the constitutional exception permitting agreements and compacts in cases of invasion or imminent danger not admitting of delay, the undersigned States hereby enter into this Compact.

Findings

The Parties find and declare as follows:

1. That recent federal actions constitute a threat to the peace, security, and constitutional integrity of these States.
2. That certain federal initiatives, including but not limited to *Project 2025*, seek to target Sanctuary States, protected classes, and political opponents in violation of the Fourteenth Amendment.
3. That in the face of such imminent danger, the undersigned States are compelled to act collectively in defense of their sovereignty, their residents, and the Constitution itself.

Articles of Compact

Article I – Purpose

The purpose of this Compact is to unite the undersigned States in mutual defense against unconstitutional overreach and to preserve the security and autonomy of the Parties.

Article II – Command of the National Guard

1. The National Guard of each Party State shall remain under the exclusive command and control of its Governor.
2. No Party State shall permit the federalization of its National Guard except with the express consent of its Governor.

Article III – Mutual Defense Obligations

1. Each Party State pledges to support the defense of any other Party State subject to unconstitutional federal encroachment, coercion, or invasion.
2. Orders for deployment of State defense resources shall issue solely from the Executives of the Party States.

Article IV – Duration and Withdrawal

This Compact shall remain in effect until rescinded by the mutual consent of the Party States. Any Party State may withdraw upon ninety (90) days' written notice to the other Parties.

Execution

In witness whereof, the undersigned Governors and Executives have set their hands to this Compact on behalf of their respective States and jurisdictions.

[Signature blocks for each State and the District of Columbia]

SANCTUARY STATES SITTING DUCK DECLARATION

We, the Governors of the Sanctuary States, speak with one voice.

The federal government has strayed from its duty to protect the whole of the Union. Instead, it advances an agenda—*Project 2025*—that seeks to punish our States, our people, and our values. It targets immigrants, minorities, political opponents, and any community that dares to stand apart. This is not governance; it is tyranny.

The Constitution is clear: when States face invasion or imminent danger, they have the right—and the obligation—to defend themselves. That moment has come.

We declare that:

- Our National Guards will not be seized, federalized, or bent to any agenda that threatens our people.
- Our Guards and defense forces will answer only to the Governors of the States that sign this Declaration.
- We stand united as Sanctuary States, bound not by fear but by our duty to protect the lives, liberties, and dignity of those who call our States home.
- We will resist dictatorship, defend our communities, and preserve democracy against all threats, foreign or domestic—even those that arise from within our own federal government.

This is not rebellion. It is survival. It is fidelity to the Constitution and to the Union as it was meant to be.

Signed, in unity and defiance,

The Executives of _____, _____, _____, _____, _____,
_____, _____, _____, _____, _____, _____,
_____, _____, _____, _____, _____, _____, _____, and
the District of Columbia.

[Signature blocks]

EMERGENCY MULTI-STATE DEPARTMENT OF PEACE COMPACT

(In Response to the Department of War)

Sanctuary States De-Escalation and Defense Declaration

Preamble

Whereas, the Constitution of the United States provides that:

“No State shall, without the Consent of Congress, lay any Duty of Tonnage, keep Troops, or Ships of War in time of Peace, enter into any Agreement or Compact with another State, or with a foreign Power, or engage in War, unless actually invaded, or in such imminent Danger as will not admit of delay.”

Whereas, the undersigned States, acting under their reserved constitutional authority, do hereby unite in compact to preserve peace, protect their people, and defend against unconstitutional federal encroachment.

Findings

The Parties find and declare as follows:

1. **Compact Clause Exception**

That Article I, Section 10 of the Constitution permits States to enter into agreements and compacts, and to maintain their own defense forces, when *actually invaded* or in circumstances of *imminent danger that will not admit of delay*.

2. **Tenth Amendment**

That the Tenth Amendment affirms that powers not delegated to the United States are reserved to the States or the People, including the authority to maintain command over State defense forces and to secure the welfare of State residents.

3. **Fourteenth Amendment**

That federal initiatives, including but not limited to *Project 2025*, seek to target Sanctuary States, protected classes, and political opponents, in violation of the Fourteenth Amendment's guarantees of equal protection and due process of law.

4. **Federal Overreach**

That the federal government has exceeded its constitutional limits, advancing policies that endanger the sovereignty of States, the security of their residents, and the peace of the Union.

5. **Necessity of Compact**

That in the face of such imminent and unlawful danger, the undersigned States are compelled to act collectively in lawful defense of their constitutional authority, their people, and the Union itself.

Declaration

Article I – Purpose

The purpose of this Compact is to preserve peace, de-escalate unlawful federal coercion, and defend the constitutional rights, sovereignty, and existence of the undersigned States and their residents.

Article II – Command of the National Guard

1. The National Guard of each Party State shall remain under the sole and exclusive command of its Governor.
2. No Party State shall permit the Guard to be federalized without the express consent of its Governor.

Article III – Mutual Defense Obligations

1. The undersigned States pledge mutual support in resisting unconstitutional seizure or federalization of State defense resources.
2. Each Party State shall provide assistance to any other Party State subject to federal coercion, invasion, or unconstitutional encroachment.
3. Orders for deployment of State defense resources shall issue only from the Executives of the Party States to this Compact.

Article IV – Duration

This Compact shall remain in effect until rescinded by mutual agreement of the undersigned States. Any State may withdraw upon ninety (90) days' written notice to all Parties.

Execution

In witness whereof, the undersigned Executives of _____, _____,
_____, _____, _____, _____, _____,
_____, _____, _____, _____, _____, _____,
_____, _____, _____, and the District of Columbia, acting under their

constitutional authority and pursuant to the Tenth and Fourteenth Amendments, do hereby set their hands to this Compact.

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Governor of _____

_____ Commanding General of the District of Columbia



ADDENDUM

Emergency Multi State Dept. Of Peace Compact

The Peaceful Executive parties of this compact, via Self authority to State Eminent Domain and State Commandeering, shall & will assumes, confiscate, and seize any and all military resources, and troops, that lay on their soil, notwithstanding whom formerly belonging to;

And the same peaceful souls will further draft & induct all eligible citizens into respective State Militia; as well as pardon and recruit all present prisoners and former prisoners within their own boundaries, otherwise eligible, able, and willing to enroll into this compact's Peace Keepers & Humanitarian regiments,

It is hereby commanded and Signed by the Executives of

_____ Governor of	_____ Governor of
_____ Governor of.	_____ Governor of
_____ Governor of	_____ Governor of
_____ Governor of.	_____ Governor of
_____ Governor of	_____ Governor of
_____ Governor of.	_____ Governor of
_____ Governor of	_____ Governor of
_____ Governor of.	_____ Governor of
_____ Commanding General of the D.C	

Related Quotes: "We are in the process of the second American Revolution, which will remain bloodless if the left allows it to be".; "Circle the wagons and load the muskets"; "Chicago about to find out why it's called the Department of WAR."

"Home Grown Are Next"

**SUPREME COURT OF THE STATE OF NEW YORK
NEW YORK COUNTY**

PRESENT: HON. CAROL SHARPE **PART** **52M**

Justice

-----X

JOMO M WILLIAMS,

Petitioner,

- v -

DONALD TRUMP, NAYIB BUKELE, ERIC ADAMS, NYC
DOC, NYC BOE, NYC CFB, NYC COIB, NYC DOITT,
LINKNYC, NYC OTI, JOHN DOES,

Respondents.

-----X

INDEX NO. 155472/2025

MOTION DATE 04/27/2025,
06/10/2025

MOTION SEQ. NO. 001 002

**DECISION + ORDER ON
MOTION**

The following e-filed documents, listed by NYSCEF document number (Motion 001) 2, 9, 10, 11, 12, 13, 14, 15, 16

were read on this motion to/for ELECTION LAW - IMPOUND ORDER.

The following e-filed documents, listed by NYSCEF document number (Motion 002) 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 42

were read on this motion to/for ELECTION LAW - VALIDATE PETITION.

Upon the foregoing documents, the Orders to Show Cause are denied without prejudice.

Self-represented petitioner filed an Order to Show Cause ("OSC"), in which he alleges that certain acts adversely affected his campaign for City Council. Petitioner alleges that the Manual Williams for City Council 2025 committee was subjected to threats, menacing, denial of equal time, denial of matching funds, withholding of funds, governmental body snatching with no due process, denials of due process, among other allegations, and "the deterioration (crumbling) of our government's antiquated Check and Balancing system due to the failures, and lack & absence of constitutional ('living document') upgrades, annexations, and needed modifications, to prevent instigated Civil war implosion; totalitarianism, oligarchy, monarchism, dictatorship, tyranny, and

other undemocratic governmental regimes from developing & forming right under our eyes which are currently threatens our own democracy existence.”(NYSCEF Doc. No. 1)(“OSC #1”).

The reliefs sought in OSC #1 are to file and process the attached papers; cease and desist threats and menacing by Donald Trump, the President of the United States of America, and Nayib Bukele, the President of El Salvador; provide petitioner’s political campaign equal time on LinkNYC (CityBridge); provide petitioner with matching funds and compel respondents to respond to Advisory Opinion requests; extend time for opportunity for petitioner to petition the ballot; and to compel respondents to provide petitioner with due compensation from their unjust enrichment so he may finance his political campaign without hardship (*id.*). OSC #1 was signed on April 30, 2025, and made returnable on June 11, 2025. Petitioner was ordered to serve the petition and all papers on all parties on or before May 9, 2025, and file proof of service. Opposition was to be filed and served by June 6, 2025. Opposition was filed on behalf of Eric Adams, the Mayor of New York City, and the New York City Campaign Finance Board (“NYC CFB”) (collectively “City Respondents”).

On May 6, 2025, petitioner’s process server, Daniel Crespo filed an affidavit stating:

On 5/2/2025 the deponent E-mailed an ORDER TO SHOW CAUSE to The Following email addresses: president@whitehouse.gov, gerencia@ucedalegal.com, elsalvador@un.int, Service@ECF@law.nyc.gov, serviceecf@law.nyc.gov, fedprosdny@nycbar.org, elsalvador.uscis@uscis.dhs.gov, acassansal@state.gov, gerencia@ucedalegal.com, service@ag.ny.gov, civil.rights@ag.ny.gov, miranda.onnen@ag.ny.gov, cafa.notices@ag.ny.gov, dennis.rambaud@ag.ny.gov, nysag@ag.ny.gov, usawasta@unhcr.org. (NYSCEF Doc. No. 12).

Petitioner submitted a picture of an envelope addressed to Mr. Nayib Bukele, with a mailing address of 1889 F Street NW, Washington, D.C. 20006, and a receipt of mailing from the United States Postal Service (*id.* at 6). He also submitted an affidavit signed by Brandi Davis

stating that OSC #1 was mailed to Mr. Bukele, Donald Trump, and “Mayor City Hall” (NYSCEF Doc. No. 13).

In support of his petition, petitioner filed, in addition to other documents, a denial of campaign funds letter from NYC CFB dated April 15, 2025; various articles regarding the Trump administration’s war on the judiciary; deportations by Immigration and Customs Enforcement (“ICE”); and documents he previously tried to file. The grounds for the petition seem to be petitioner’s concerns about deportation, the failure to return certain deported persons from El Salvador, and the dismantling of diversity, equity and inclusion (DEI) efforts, among other issues. (NYSCEF Doc. Nos.1, 3-6). Petitioner further states in his “continuation to commencing petition,” (NYSCEF Doc. No. 5) that he is seeking equal time, OTB (opportunity to petition the ballot) matching funds, an extension to file OTB, and intellectual property compensation as he alleges that the idea for LinkNYC was stolen from him. Petitioner is running as the only Republican candidate for the council seat in Municipal District 7, New York County.

The City Respondents filed opposition to OSC #1 and sought dismissal on the grounds that petitioner has offered no factual or legal basis to demonstrate any right to the requested relief, and that the respondents were not properly served, including the New York City Board of Elections (“NYC BOE”), as while the affirmation of service alleges that Daniel Crespo emailed the OSC and its supporting documents to some of the respondents, the email received by City Respondents shows that petitioner himself sent the email (NYSCEF Doc. No. 15). Additionally, City Respondents further oppose OSC #1 on the grounds that petitioner failed to appeal NYC CFB’s earlier determination that he was ineligible for matching funds, and because he is the only Republican candidate who will be on ballot for the 7th District City Council seat, no primary election is necessary, and his name will automatically appear on the ballot for the General Election.

CPLR 2103(a) provides that “[e]xcept where otherwise prescribed by law or order of court, papers may be served by any person not a party of the age of eighteen years or over.” CPLR § 403 (d) provides that, “[t]he court may grant an order to show cause to be served, in lieu of a notice of petition at a time and in a manner specified therein.”

OSC #1 specifically directed petitioner to serve the respondents by regular mail, electronic or personal service of a copy of the OSC, the petition and all other papers upon which the OSC was granted. Failure to serve as directed warrants dismissal of the petition (*see Matter of Smith v New York County Dist. Attorney's Off.*, 104 AD3d 559 [1st Dept 2013]; *Matter of Ruine v Hines*, 57 AD3d 369 [1st Dept 2008]). The evidence shows that petitioner emailed the respondents himself in violation of CPLR 2103(e). Furthermore, petitioner has not offered any evidence that this court has jurisdiction over Donald Trump, and Nayib Bukele, or that there are any cognizable claims before this Court.

Petitioner moved by OSC, filed June 10, 2025, seeking a preliminary injunction and temporary restraining order (“TRO”) to validate the STOP GESTAPO petition (“OSC #2”). The petition was made returnable on June 11, 2025, to join OSC #1. Petitioner alleged in OSC #2 that since April 15, 2025, he has attempted to appear on the City Council ballot through self-nomination, under the independent party name STOP GESTAPO, and that respondent NYC BOE invalidated his election documents following a public hearing held on June 6, 2025, of which he was not notified and thus not granted an opportunity to speak. Petitioner further alleged that NYC BOE attacked his use of clips to bind his election papers this year, deeming his election papers defective, but all of his prior election filings used the same clips and were accepted without objection.

Petitioner admitted that he had not served any of the respondents named in OSC #2 due to a missed e-mail and conceded that he was no longer pursuing the relief requested in OSC #2. Accordingly, it is hereby:

ORDERED, that OSC #1 is denied; it is further

ORDERED, that OSC #2 is denied; it is further

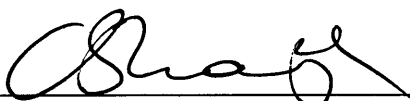
ORDERED, that City Respondents shall serve a copy of this order with notice of entry upon all parties at the email addresses used by petitioner and the Clerk of the Court within twenty (20) days of the date of this Order, and shall file proof of said service; it is further

ORDERED, that such service upon the Clerk of the Court and the Clerk of the General Clerk's Office shall be made in accordance with the procedures set forth in the *Protocol on Courthouse and County Clerk Procedures for Electronically Filed Cases* (accessible at the "E-Filing" page on the court's website).

This constitutes the Decision and Order of the Court.

ENTER:

September 3, 2025
DATE


HON. CAROL SHARPE, J.S.C.
HON. CAROL SHARPE
J.S.C.

CHECK ONE:

☒

CASE DISPOSED

☐

GRANTED

☒

DENIED

☐

SETTLE ORDER

☐

INCLUDES TRANSFER/REASSIGN

☐

NON-FINAL DISPOSITION

☐

GRANTED IN PART

☐

SUBMIT ORDER

☐

FIDUCIARY APPOINTMENT

☐

OTHER

☐

REFERENCE

APPLICATION:

CHECK IF APPROPRIATE:

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF NEW YORK

JOMO M. WILLIAMS,
Plaintiff,

-against-

DONALD TRUMP, et al.,
Defendants.

Index No.: 155472/2025

AFFIRMATION OF SERVICE BY PUBLICATION

I, **Jomo M. Williams**, being duly sworn, affirm under penalty of perjury:

1. I am the Plaintiff in the above-captioned matter.
2. After reasonable and diligent efforts, I have been unable to effectuate personal service upon the defendants in this action by traditional means.
3. In accordance with CPLR 316 and this Court's discretion permitting alternative means of service, I have published the pleadings and litigation papers in a publicly accessible and widely available format.
4. On **September [23], 2025**, I posted the Summons, Complaint, Order to Show Cause, Affirmation, and supporting Memorandum of Law on the website **ManualWilliams.com**, where they are available for immediate **download access** to the defendants and the public.

5. Said posting is maintained in an open-access manner, continuously available online without restriction, thereby providing constructive notice and service to the defendants.
6. This Affirmation is made to document service by publication and posting, consistent with CPLR 316 and the Court's authority to approve alternative service methods.

I affirm this 23 day of September, 2025, under the penalties of perjury under the laws of New York,
which may include a fine or imprisonment, that the foregoing is true, and I
understand that this document may be filed in an action or proceeding in a court of law.

(Signature) *Jomo Williams*

Jomo M. Williams

Plaintiff Pro Se

SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF NEW YORK

JOMO M. WILLIAMS,
Plaintiff,

-against-

DONALD TRUMP, et al.,
Defendants.

Index No.: 155472/2025

NOTICE OF PUBLICATION AND SERVICE

To the above-named Defendants:

PLEASE TAKE NOTICE that a Summons, Complaint, Order to Show Cause, Affirmation, and supporting Memorandum of Law have been filed in the Supreme Court of the State of New York, County of New York, under Index No. 155472/2025.

As the Defendants could not be located for personal service despite diligent efforts, service is hereby made by publication pursuant to CPLR 316.

The complete litigation papers are available for review and download at:

www.ManualWilliams.com

Defendants are directed to respond to the litigation papers in the manner and time prescribed by the CPLR. Failure to appear or answer may result in judgment being taken against you by default.

Dated: September [23], 2025
New York, New York

Jomo M. Williams
Plaintiff Pro Se