
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

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 [INSERT DATE OF PRIOR ORDER], 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.

Dated: September 19, 2025

New York, New York

JOMO M WILLIAMS, Pro Se

/s/ Jomo M Williams

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>



NYSCEF Confirmation Notice

New York County Supreme Court



The NYSCEF website has received an electronic filing on 09/21/2025 11:35 PM. Please keep this notice as a confirmation of this filing.

155472/2025

JOMO M WILLIAMS v. Donald Trump et al

Assigned Judge: Carol Sharpe

Documents Received on 09/21/2025 11:35 PM

Doc #	Document Type
-------	---------------

60	ORDER TO SHOW CAUSE (PROPOSED) (AMENDED), Motion #001
61	AFFIRMATION, Motion #001
62	MEMORANDUM OF LAW, Motion #001
63	EXHIBIT(S) A, Motion #001

Filing User



E-mail Service Notifications

An email regarding this filing has been sent to the following on 09/21/2025 11:35 PM:

STEPHEN EDWARD KITZINGER - skitzing@law.nyc.gov



Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

Phone: 646-386-5956 Website: http://www.nycourts.gov/courts/1jd/suptctmanh/county_clerk_operations.shtml

NYSCEF Resource Center, nyscef@nycourts.gov

Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile



NYSCEF Confirmation Notice

New York County Supreme Court



155472/2025

JOMO M WILLIAMS v. Donald Trump et al

Assigned Judge: Carol Sharpe

Email Notifications NOT Sent

Role	Party	Attorney
Defendant / Respondent	Donald Trump	No consent on record.
Defendant / Respondent	Nayib Bukele	No consent on record.
Defendant / Respondent	NYC DOC	No consent on record.
Defendant / Respondent	NYC BOE	No consent on record.
Defendant / Respondent	NYC COIB	No consent on record.
Defendant / Respondent	NYC DOITT	No consent on record.
Defendant / Respondent	LINKNYC	No consent on record.
Defendant / Respondent	NYC OTI	No consent on record.
Defendant / Respondent	JOHN DOES	No consent on record.

* Court rules require hard copy service upon non-participating parties and attorneys who have opted-out or declined consent.

Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

Phone: 646-386-5956 Website: http://www.nycourts.gov/courts/1jd/suptctmanh/county_clerk_operations.shtml

NYSCEF Resource Center, nyscef@nycourts.gov

Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile



NYSCEF Confirmation Notice

New York County Supreme Court



155472/2025

JOMO M WILLIAMS v. Donald Trump et al

Assigned Judge: Carol Sharpe

Role	Party	Attorney
	Jomo M Williams	No consent on record.

* Court rules require hard copy service upon non-participating parties and attorneys who have opted-out or declined consent.

Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

Phone: 646-386-5956 Website: http://www.nycourts.gov/courts/1jd/suptctmanh/county_clerk_operations.shtml

NYSCEF Resource Center, nyscef@nycourts.gov

Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile



NYSCEF Confirmation Notice

New York County Supreme Court



The NYSCEF website has received an electronic filing on 09/22/2025 08:57 AM. Please keep this notice as a confirmation of this filing.

155472/2025

JOMO M WILLIAMS v. Donald Trump et al

Assigned Judge: Carol Sharpe

Documents Received on 09/22/2025 08:57 AM

Doc #	Document Type
-------	---------------

67	ORDER TO SHOW CAUSE (PROPOSED) (AMENDED), Motion #001
----	---

Filing User



E-mail Service Notifications

An email regarding this filing has been sent to the following on 09/22/2025 08:57 AM:

STEPHEN EDWARD KITZINGER - skitzing@law.nyc.gov

JOMO M WILLIAMS - 

Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

Phone: 646-386-5956 Website: http://www.nycourts.gov/courts/1jd/suptctmanh/county_clerk_operations.shtml

NYSCEF Resource Center, nyscef@nycourts.gov

Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile



NYSCEF Confirmation Notice

New York County Supreme Court



155472/2025

JOMO M WILLIAMS v. Donald Trump et al

Assigned Judge: Carol Sharpe

Email Notifications NOT Sent

Role	Party	Attorney
Defendant / Respondent	Donald Trump	No consent on record.
Defendant / Respondent	Nayib Bukele	No consent on record.
Defendant / Respondent	NYC DOC	No consent on record.
Defendant / Respondent	NYC BOE	No consent on record.
Defendant / Respondent	NYC COIB	No consent on record.
Defendant / Respondent	NYC DOITT	No consent on record.
Defendant / Respondent	LINKNYC	No consent on record.
Defendant / Respondent	NYC OTI	No consent on record.
Defendant / Respondent	JOHN DOES	No consent on record.

* Court rules require hard copy service upon non-participating parties and attorneys who have opted-out or declined consent.

Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

Phone: 646-386-5956 Website: http://www.nycourts.gov/courts/1jd/suptctmanh/county_clerk_operations.shtml

NYSCEF Resource Center, nyscef@nycourts.gov

Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile



NYSCEF Confirmation Notice

New York County Supreme Court



155472/2025

JOMO M WILLIAMS v. Donald Trump et al

Assigned Judge: Carol Sharpe

Role	Party	Attorney
	Jomo M Williams	No consent on record.

* Court rules require hard copy service upon non-participating parties and attorneys who have opted-out or declined consent.

Hon. Milton A. Tingling, New York County Clerk and Clerk of the Supreme Court

Phone: 646-386-5956 Website: http://www.nycourts.gov/courts/1jd/suptctmanh/county_clerk_operations.shtml

NYSCEF Resource Center, nyscef@nycourts.gov

Phone: (646) 386-3033 | Fax: (212) 401-9146 | Website: www.nycourts.gov/efile

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 [22], 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 22 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 [22], 2025
New York, New York

Jomo M. Williams
Plaintiff Pro Se

Proposed Multi State/Local Dept. of Peace Compact Downloads

[Proposed Multi State/Local Dept. of Peace Compact](#)

Emergency Multi State Dept -
Google Docs (pdf)

DOWNLOAD

Challenging the Legal Racial
Profiling law (pdf)

DOWNLOAD