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UNITED STATES COURT OF APPEALS

FOR THE NINTH CIRCUIT

Cyrus Hazari **Appellant & Private Attorney General** v. County of Santa Clara et al., and DOES 1-200 **Appellees**	Appeal # 25-3879 Trial # 19-cv-04392-BLF Declaration of Appellant in support of Reconsideration *en banc* and Submission under UNCAT Article 20

I, Cyrus Hazari, declare:

The Ninth Circuit courts' judges have caused me to lose an 'impossible-to-lose' state lawsuit which I won previously in 2005 against the same recidivist, Mandy Brady, for the same causes of action. This person has caused litigation with several of her neighbors through theft and greed, and ruined lives. This Circuit's courts repeatedly had the responsibility and the final opportunity to stop my torture before it continued in other courts, but instead 'joined in' my torture through acquiescence, consent, and instigation. In this appeal, we see all three.

This outcome occurred despite prior victory in Hazari v. Brady (2002-1-CV-808354, 2002) and subsequent state records that repeatedly confirmed my rightful possession and damages. These facts were never refuted on the merits, only procedurally barred by judicial misconduct.

In the process of lawfully remedying Brady's repeated theft, vandalism and harm, I was subjected to systemic torture by this Circuit's courts, as I tried to stop my cruel, inhuman and degrading treatment and discrimination in the California courts without any recourse. This prohibited treatment by California judges under a systemic policy of discrimination and torture of disabled and pro se litigants, has been documented in the record of multiple litigants, including two independent California litigants[1] who were forced to file for certiorari in the U.S. Supreme Court concurrently with my 20+ attempted writs, exhausting all domestic remedies, and joining me in a complaint to the OHCHR and United Nations Special Procedures, confirming in detail my evidence of policy-based systemic torture by California judges.

Under this judicial policy, California judges will ensure through their orders that their collaborative federal judicial peers frustrate the attempts of California litigants to secure relief and remedy for their UNCAT violations through the federal courts. Thus, although the federal judiciary has a duty to preempt and correct unconstitutional state conduct, its behavior instead reflects **subordination to a coordinated policy of judicial preservation**, which shields state-level torturers and ensures impunity. Judge Beth Freeman to committed this prohibited act stated on the record that Full Faith and Credit requires it. This confirms that Understanding 5 of the United States must be severed with prejudice to comply with the object and purpose of the treaty. This is one dimension of the states of the United States defiance of the UNCAT and other human rights treaties, which are documented in the following public and sealed[2] records:

- California Superior Court in the County of Santa Clara: 16cv295730, 17cv312522, 18cv335914, 18cv337311, 19cv350958

[1] Family Court of Santa Clara County, California: Eva Danilak, case # 2014-6-FL-013527, Julia Minkowski, case # 19FL004302

[2] Sealed records are available for review by international human rights bodies and State representatives.

• California Sixth District court of Appeals: H052601, H052596, H052563, H052068, H051831, H051766, H051717, H051557, H049580, H049414, H049025, H048909, H048827, H048755, H048725, H048713, H048512, H048471, H048396, H048298, H048283, H047999, H047840, H047822, H047655, H047629, H047629, H047629, H047614, H047603, H047541, H047511, H047470, H047432, H047432, H047432, H047432, H047432, H046710, H046595, H046576, H046576, H046576, H028327, H020863, and multiple actions that could not be brought due to invariant deadlines.

• California Supreme court: S284268, S284075, S283992, S283705, S268997, S267318, S267314, S266549, S266540, S266474, S266471, S265717, S263716, S263714, S263711, S263610, S253843, S253843, S253843, and multiple actions that could not be brought due to invariant deadlines or due to obstruction of my filings by that court.

The prohibited treatment that I received at the hands of Ninth Circuit judges, starting with Lucy Koh, caused me to lose Life, Liberty, property and Rights. This Circuit's courts continuously tortured me, and reduced me to state of debilitation under severe disabilities, confinement to one room, restriction of physical activities and movement, perpetual state of serious health, deprivation of rights in perpetuity, elimination of life-saving medical treatment, impossibility of recovery and rehabilitation, loss of quality of life and absence of opportunity to pursue happiness. I am completely alienated by my state of citizenship and subject to continuous derision and punishment. Today I incessantly battle infections to stay alive, while untreated diseases ravage what is left of my body and mind. Scientific and disciplined measurements chronicle the torture for judges who increase the pain and suffering unlike the ordinary reasonable human being who would act to stop it.

The harms intentionally caused to me by judges also greatly affected others. Their accounts will be provided separately. This Circuit's judges pushed and knowingly and deliberately kept me on the verge of death while I struggled to thwart and mitigate court-induced damages and harm to myself and to my wife, while judges compounded our severe pain and suffering and those of others who were affected. On one recording of a coerced court appearance where a cruel and inhuman California judge, Socrates Manoukian, who is known[3] for hatred of disabled litigants, distressed me so much that I appear to be having a heart attack. Much later, I was informed of two areas of infarcts on my heart, suggesting multiple incidents of torture may have caused them. During that court appearance with Manoukian, he imposed a fine of approximately $600,000 for failing to participate and produce information, unaccommodated and under coercion by California courts, while the records of three California courts (Superior, Appeal, Supreme courts) were being filled with my requests for accommodations and writs for their denials, each reporting accumulating injuries that were serious, irreparable and life-changing.

My accumulating financial harm alone now has been compounded by this Circuit's courts to a financial loss and liability in the approximate amount of $7.5 million dollars with no end in sight and with no bankruptcy protection from this Circuit despite being coerced to stop my torture and punitive and retaliatory damages by judges and courts every single day while I am continuously deprived of life saving treatment. This has been my living hell since March 2018 without break.

This Court's refusal to reopen Appeal 24-6312, despite its own order permitting such a reopening, and the subsequent dismissal of Appeal 25-3879—while I was under medical duress— while its District Court under two judges in two civil cases, and its Bankruptcy Appellate Panel, tortured me by coercing injurious and unaccommodated participation despite incessant requests for Safe Harbor and disability accommodation, is a feature of domestic jurisprudence. This Circuit's courts and their judges continue

[3] See the testimony of Julia Minkowski

their invariant and incessant acts of psychological torture and re-traumatization, knowingly, deliberately and with impunity. If a judge fails to violate human rights, they can be punished for 'doing a bad job by being overturned on appeal by an opponent that relishes the unfair advantage provided by the systemic judicial discrimination and human rights violations.

I have been held for seven+ years in a desperate struggle for justice, relief and remedy, that are intentionally indicated to me as being available through the courts, with no possibility of reaching them through any court, and no possibility of withdrawing from the pursuit, or protecting myself from torture by the courts. Instead I have been gaslighted[4] by every judge, causing me to question my own perceptions and my reality as my body and psyche disintegrated, resulting in deep psychological scars. I was subjected by every judge to procedural abuse, and tactics used to disempower a victim, creating a deep-seated sense of fear and alienation. Judges privileged attorney access to the court while marginalizing mine. Each judge ultimately created a cycle of manipulation that severely affected my mental health and self-esteem. No judge and no law enforcement or other public official of authority figure intervened to protect me from severe psychological harm.

Each judge of this Circuit who has dealt with me was made painstakingly and meticulously and clearly aware on a chronological and frequent basis about my current medical condition, of my accumulating burden of injuries, and provided with unmistakable feedback about the measured and documented harm they were causing me and had caused me. This invariably results in retaliation, prejudice and punishment, with the judge's expectation that unlimited power will subdue the litigant into total obedience despite prohibition in force in the domain of human rights.

[4] E.g. Kyle Velte, The Supreme Court's gaslight docket, Temple Law Review, Beasley School of Law, vol. 96, No.3 (2024)

Except for one judge, Beth Freeman, who from 2019 until March 2025, admitted that I critically need life-saving medical treatment in the form specified by my physicians and care providers and established under scientific and statistical analysis in the 2023 international medical paper by Solomon et al.[5] Judge Beth Freeman impeached over 40 state and federal judges by providing me with unprecedented Safe Harbor and disability accommodation. However, at the moment that she was signaled to end my Safe Harbor and disability accommodation by my adversaries in collusion with Brady et al., and having been made aware of my actions to reform the judicial process in the United States and to punish wayward judges whom she had impeached, she immediately took measures to rehabilitate them as much as possible, and immediately stopped my Safe Harbor and disability accommodation despite the accumulated and life-endangering condition that she had recognized for approximately six years and which I had been judicially held in by others, and immediately acquiesced to my torture by every other actor, and joined them. Her sudden and life-endangering endorsement of the torture by California courts has provided a goldmine of evidence of systemic torture and U.S. non-compliance with UNCAT.

The transformation of this judge from an ethical judge to a perpetrator of hate was catastrophically traumatic. She admitted in her orders in 19-cv-04392-BLF, ECF-87 page 2 lines 1-11, that this treatment is REQUIRED OF HER, and then proceeded to demonstrate her obedience in each subsequent order.

> *Order of the Sixth District Court of Appeal in Matter No. H052863, dated 3/3/25; B) Order of the Sixth District Court of Appeal in Matter No. H052563, dated 11/6/24; C) Order of the Sixth District Court of Appeal in Matter No. H052601, dated 11/6/24; D) Order Denying Motion for Disability Accommodation in Hazari v. Superior Court of Santa Clara County, et al., Case No. 21-CV04262 JSW (N.D. Cal. 2021); and E) Order Granting Motion to Seal Docket and Denying Motion for Extension of Stay in Hazari v. Superior Court of Santa Clara County, et al., Case No. 21-CV04262 JSW (N.D. Cal. 2021). See ECF 83.* ***Federal Courts can take judicial notice of facts that "can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned." Fed. R. Evid. 201(b)(2)****. Accordingly, the Court GRANTS*

[5] Solomon et al., The Multiple Sclerosis Stress Equation - Exhibit N
https://www.academia.edu/129081119/The_Multiple_Sclerosis_Stress_Equation

*the County's request to take judicial notice of Exhibits A-E. See Struggs v. Hedgpeth, No. C 11-02191 YGR PR, 2012 WL 4497790, at *1 (N.D. Cal. Sept. 28, 2012) (taking judicial notice of filings in other actions).*

A **federal**[6] judge with personal knowledge of the intricate details of my medical condition and who provided Safe Harbor and accommodation to me for almost six years did not hesitate for one moment to abandon her bright line, despite my periodic updates reporting my mutilation by other courts. This judge never once looked outside her court and intervened in my torture beyond her customary boundaries. This violates the UNCAT as each of my requests for Safe Harbor and disability accommodation reporting my human rights violations, when viewed under the knowledge she was provided about my medical condition, its chronological worsening and its controlling factors, required *sua sponte* intervention from her to shield me from torture and to invoke an independent investigation. Instead, she is NOT ALLOWED to perform such a domestically prohibited act. It was merely sufficient that a California public official allege that I have demonstrated the ability to litigate unaccommodated for Freeman to abandon her own knowledge and bright line, and immediately treat me "like a kind of trash not worth the time"[7]. And Freeman knew that I have a lawsuit against judges who I had informed her were torturing me, and the federal lawsuit against these California judges is filed in her own court! Defendant Mary Greenwood, presiding judge of the California Sixth District Court of Appeals, is a notorious serial torturer, invents facts and tortures disabled pro se litigants. She is identified as so doing by multiple independent disabled litigants whom I have identified in the lawsuit in Freeman's own district court. These victims testified to their judicial torture by declarations in my lawsuit in Freeman's own district court (in case # 21-cv-04262-JSW) in which federal judge Jeffrey White, Freeman's peer whom she

[6] Note: the obligation under UNCAT is tendered by the federal government on behalf of the states of the USA. Under Article VI, the founders of this nation deliberately bound each state judge individually to the obedience of treaties, following the lessons learned through the Articles of Confederation.
[7] Distinguished legal scholar and Seventh Federal Circuit judge Richard Posner resigned 'in protest' informing the press and the public that judges treat pro se litigants like "a kind of trash not worth the time" – NY Times

unwittingly impeached, and then attempted to rehabiliate, also obstructs justice, endorses my torture, immunizes perpetrators of torture, and tortures me.

Upon acquiescing to Greenwood's torture and then commencing her own, Freeman was immediately provided with measurements of the distress and severe pain and suffering that she induced. These were recorded by regulated medical devices, and she ignored them. Thus she militarily abandoned her bright line at a moment's notice, and ignored all of her stays spanning almost 6 years, including the last stay where she expanded the stay duration to ONE YEAR, which is prohibited according to judges' interpretation of law and precedents in domestic jurisprudence Such arbitrary and capricious judicial considerations incite public contempt for the apparent inhumanity of our judges, which is increasing. Freeman then proceeded to punish me for objecting to my treatment and coercion and intimidation by her to participate unaccommodated in litigation at the known cost of injury and unequal in opportunity to my adversaries. Her subsequent orders distinctly evidence contempt and cruelty radically contrasting her compassionate and receptive past conduct. The effect on her behavior is similar to a a person being trigger into a hypnotic trance by one tiny stimulus.

This judge was extremely well informed about my medical condition since 2019, my susceptibilities to injury and the mechanisms of injury, was educated about the nature of injuries and their seriousness, as were each and every judge with who I dealt over seven+ years. She ignored her role in ending my Drug Modifying Therapy (DMT)[8] that was increasingly vital because of the accumulative degradation of my health and bodily function. Over the period of my torture, the DMT had been graduated in potency to a

[8] Multiple Sclerosis is a dangerous disease and has no cure. The only medical treatment, which is considered essential, is DMT, which alters the risk of relapse, but no DMT prevents relapse. Distress on the other hand predictably induces MS relapse and its removal accompanied with complete rest predicts remission. Therefore, if distress (the opposite of eustress) can be prevented, then the distress prevention, in effect, operates as one form of DMT. Since March 2018, 10 courts and over 40 judges made sure that I do not get any meaningful rest or isolation from distress, and certainly not equal to or consistent with medical and scientific specifications.

highly potent and dangerously reactive new drug, seen as critical to my health. Knowing my circumstances, Freeman deliberately eliminated the opportunity for me to receive the essential DMT, leaving me more vulnerable than ever to court-induced injuries from distress. Episodic distress induced by judges and courts now present a much higher likelihood of ending my life or causing much greater physical and mental injuries, including from continued permanent loss of my brain and spine tissues that are critical to my function, cognition and survival.

Freeman finally rejoined the ranks of American judges who do not have any room for human rights in their adjudicative function. These acts flagrantly violate obligations under the Convention Against Torture (UNCAT)[9], the International Covenant on Civil and Political Rights (ICCPR)[10], the Convention of the Rights of Persons with Disability (CRPD) and accepted principles on psychological torture under the U.N. Special Rapporteur's framework[11]. They are the judicial norms in the United States. The clear observation based on voluminous public records reporting the chronological erosion of my bodily integrity by judges, chart a collaborative hate crime in progress by a distributed ensemble of judges that no normal and reasonable human being would permit or endorse. This occurred consistently in every one of 10 state and federal courts, while medical science and statistics held an objective and comparative baseline of appropriate response to prevent or minimize injuries, and I provided reporting of injuries and predictions of harm to each judge.

Such hate crime is typically seen when the intention of the perpetrator is to torture someone who is the subject of hate and malice. In contrast, the judicial norm is to impersonalize the torture but require it strictly upon any non-conformity of a litigant with the standard practices and the operational comforts and habits of a court. To emphasize the dehumanization that is a mandatory requirement of judicial

[9] CAT General Comment No. 2 (2008), U.N. Doc. CAT/C/GC/2
[10] Human Rights Committee, General Comment No. 32, CCPR/C/GC/32 (2007)
[11] Special Rapporteur on Torture, A/HRC/43/49

performance, we might use a manufacturing representation: A judge must first eliminate the 'human' from the 'being' and then 'process' the 'being' as an 'object' through a mechanistic, inflexible and highly restrictive 'business operation'[12] that only directs hate and malice to the 'object' if its processing deviates from 'standard practices'. This de-humanization and objectification of human beings does not recast what is intentional infliction of severe pain and suffering, or what constitutes cruel, inhuman and degrading treatment or punishment.

The uniformity of this inhuman and anti-social conduct, in a psychological and psychiatric context, is recognized as a disease that must be cured. However, under judicial policy it is a custom, an architecture for necessary dehumanization in order to perform uniform treatment, and a judicial norm that is identical in every court. It thus constitutes required conduct from every judge, and is characterized by each judge as being 'ethical'. Contrast with the reign of a monarch, and the *de minimis* value of a human life under the stereotypic monarchy. Now contrast with the baseline of human rights which absolutely relies on an 'ethical and independent' judiciary. Thus an assumption made by the entire world that the judiciary must be relied upon to recognize and enforce human rights is shown instead to be the source of the most grave and uncorrectable violation of human rights and elimination of absolute prohibitions under *jus cogens*. Justice cannot be safe in the hands of any person who does not hold human rights as the foundation of ethics, and the primary ingredient for delivering justice.

Under domestic laws, the judicial conduct herein—permitting disqualified judges to adjudicate a matter involving human rights violations, knowingly ignoring my disabilities, and manipulating procedural rules—amounts to 'fraud on the court' and violates due process, and is unlikely to be remedied by the same judges who torture me under uniform judicial policy. Every judge is personally immune from liability and criminal prosecution from the harm they cause, by virtue of

[12] Referred to as the "administration of justice"

their own self-serving precedents. Judicial fact-inventions, mischaracterizations of evidence, obstruction of truths are standard procedures for making the appearance that lawful sanctions are the common components of judicial torture to ensure the mutilation and murder of a litigant under jurisdictional custody of each court. An example is Freeman's allegation of my 'demonstrated ability', the AI-dependent artificial human, while evading challenge that it is my CAPACITY that controls my litigation participation.

In contrast, under the UNCAT, the judicial conduct that is statistically shown to be the norm in the United States, is a crime, with effectively no shield of immunity for perpetrator or accomplice, and no statute of limitations for prosecution or relief and remedy.

Faced with assured judicial torture while courts continued to strip me of rights, and all financial means including imposing a debt of $7.5 million dollars for my persistent objections and defense of human rights of the People of the United States, I was forced to engage with others in national reform of jurisprudence and ensuring accountability of our judges who operate extra-constitutionally and in violation of international law under the requirements of a uniform and secreted judicial policy. The 'equivalence' that the United States assures the CAT is the basis for this nation's aversion to implementing legislation does not exist. This truth is documented in the records of 10 state and federal courts, and I accurately summarize it in this declaration.

The treatment that I received from this Circuit's courts, particularly when you compare the docket and carefully review every word of every filing by me in the following actions:

- Federal district court of Northern California: 19-cv-01986-LHK, 19-cv-04392-BLF and 21-cv-04262-JSW,

- Ninth Circuit court of Appeals: 19-16291, 22-16046, 22-16174, 23-15221, 24-3353, 24-6312, and this appeal,

document the non-equivalence of domestic measures and the measures if UNCAT was enforced as self-executing. I submit that the records of these identified California proceedings and these Ninth Circuit proceedings, with the addition of the following records:

- Federal district court of Denver Colorado: 23-cv-03168-RMR-MEH.
- Tenth Circuit court of Appeals: 24-1107
- Multiple attempted writs of certiorari in the U.S. Supreme Court to stop my judicial torture, culminating after approximately FOUR YEARS of exclusion and obstruction of my access by that court in 23-7017, and then 24-5808, 24-6012 and my subsequently obstructed writs against California and the 9th and 10th Circuits since those filed and denied writs, indicating that, as a policy, the highest court in the United States does not recognize the non-equivalence domestic implementations contrasted with the self-execution of human rights treaties. In the eyes of that court, my prohibited treatment by over 40 judges is the rule of law in the United States.

provide a detailed and rich verification that the United States, particularly its judiciary, systemically violate the UNCAT and that the violations are uncorrectable absent international intervention.

ALL of these lawsuits, except California 17cv312522, 18cv335914 arose from a single lawsuit (16cv295730 Hazari v. Brady et al.) resoundingly won in 2005, and refilled in 2016 and dismissed in 2021 through my torture and exclusion from the California courts. The disposition of 17cv312522 and 18cv335914 based on the same judicial torture, necessitated the voluminous actions in 10 courts and dealings with over 40 judges over the past seven+ years to try to access relief and legal remedies for torture and deprivation of rights, which is never-ending and without possibility of relief or remedy under judicial policy predicted statistically to be systemically in force

throughout the United States.

A few additional specific facts related to this appeal are pertinent to the motion to reconsider.

In the present appeal, I filed a **Notice of Appeal** on **June 18, 2025**, and a correcting **Errata** on **June 19, 2025**, both of which were timely and in compliance with Rule 4 of the Federal Rules of Appellate Procedure.

On **June 23, 2025**, the Clerk's Office unilaterally issued a preliminary injunction briefing schedule (setting a due date of August 18) **without any ruling on my pending disqualification motions, medical filings, or accommodation requests in 24-6312**.

In response, I filed the following key documents:

- **Amended Notice of Appeal** on **June 24, 2025**;
- **Emergency Motion for Accommodation and Safe Harbor** on **July 16, 2025**, supported by sealed medical documentation;
- **Request for Judicial Notice** (RFJN) on **July 16, 2025**, submitting evidence of judicial disqualification and international treaty obligations;
- **Motion to Seal Medical Evidence**;
- **Supplemental Memoranda and Disqualification Notices** previously served on Ninth Circuit Judges.

These filings documented both:

- The **jurisdictional invalidity** of the panel due to prior disqualifications (see 28 U.S.C. §§ 144, 455); and

- My **medical incapacity** to comply with procedural deadlines without accommodation, under ADA Title II and federal due process protections.

On or about **August 28, 2025**, this Court dismissed my appeal **without addressing or acknowledging**:

- My medical disability and pending motion for accommodation;
- The existence of filed and served **disqualification notices** against participating judges;
- The **jurisdictional defects** caused by those disqualifications;
- The **international human rights violations** asserted in the appeal, including torture under UNCAT Articles 1, 2, 12, and 14.

Under domestic law, this **constitutes fraud upon the court**, judicial misconduct, and denial of due process, as the dismissal was engineered to occur while I was medically incapacitated and after I had formally challenged the panel's jurisdiction. I cannot litigate the fraud on the court yet because the motion to reconsider en banc has the shortest deadline which is impossible but must be met. The fraud awaits a separate procedural pathway called a vacatur. But I provide the facts for the Article 20 complaint. The radical non-equivalence of domestic laws and UNCAT is further displayed when we shall witness how the Court has the power to **recall or vacate** its own order where fundamental legal defects, disqualifications, or violations of core rights are established, and however it rules, it will impeach either its past conduct or its future conduct. Even when such stark inconsistencies and contradictions are prima facie clear in the public records, judges in the United States are statistically certain to ignore them and proceed with mandatory violations of human rights.

Besides the reconsideration motion and the vacatur, other actions are required, including injunction in multiple courts, writ to a higher court, and no doubt more artificially and unjust procedural requirements

and judicial gamesmanship to exhaust and frustrate any possibility of protection, relief, remedy or punishment. Contrast with the Istanbul protocol and the requirement of immediate protection and prompt independent investigation pursuant to standards: in the United States, a litigant has to change the entire legal system and judicial process to receive protection and relief from torture, while tortured and punished by judges, and others acting under color of authority.

As established in my filings, my medical condition is **life-threatening** and exacerbated by procedural coercion and litigation trauma. I have previously experienced:

- Physical collapses during litigation events and under coerced participation;
- Documented neurological injuries in critical bodily control systems under distress;
- Worsening burden of dangerous diseases and debilitating symptoms caused directly by coerced participation in litigation with intimidation of punishment and deprivation of rights[13] court deadlines and exclusionary conduct,
- And other harm documented chronologically in the cited court records showing their onset and progress, and 'shocking the conscience'.

The dismissal of this appeal once again deprived me of protection, forced continued litigation in a hostile and medically dangerous *forum nullus*, and **knowingly disregarded** binding accommodation and human rights obligations. The incessant distress and the continuing torture has been met by more worrisome imaging findings and the need for more tests, to explain my increasing decline and suffering.

Since this appeal was dismissed, I have succumbed to another infection and I write under oppressive coercion to continue to demand relief and remedies and judicial reform, and defend other victims of the judicial process as a Private Attorney General, because no other branch of government cares about

[13] including a ban from courts through being labeled vexatious

judicial torture or is able, under Separation of Powers, to intervene. If the UNCAT was properly respected as Article VI of the Constitution commands, and as the CAT has specified, this egregious and unconscionable state of affairs would not exist. The information emerging from around the country about consistent prohibited judicial conduct as a norm of the domestic judicial process is of national and international significance.

These facts, and others copiously described in my voluminous writings in 10 courts, demonstrate that U.S. domestic remedies for torture—especially by judicial actors—are not equivalent in law or function to the protections mandated by the UNCAT. The systemic prohibited acts by the judiciary are uncorrectable by domestic mechanisms. This is why I submit this declaration under penalty of perjury as a cornerstone for urgent action under Article 20.

I certify that the facts reported in my Motion for Reconsideration *en banc* are true and correct. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

15 September, 2025.

Cyrus Hazari