Case No: 27-CV-WR1-2025-0198

Pursuant to NRS 239B-030, the undersigned affirms that this document does not contain social security numbers.

IN THE ELEVENTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA IN AND FOR COUNTY OF PERSHING

JOHNNY E. McMAHON, Petitioner, vs. THE STATE OF NEVADA, etal. Respondents,	PETITIONER'S REQUEST FOR ADMISSIONS PURSUANT TO FED. R. CIV. P. RULE 36 AND HEARING REQUESTED WITH PETITIONER PRESENT.

COMES NOW, McMahon, Petitioner, Pro se, moves this Honorable Court to Grant the above captioned Petitioner's Request for Admissions Pursuant to Fed. R. Civ. P. Rule 36 and Hearing Requested with Petitioner Present. Based upon the compelling and overwhelming evidence on file, whereby the State Respondents, in both open court, and in opposition briefs, have been asserting ad nauseum, for 19 years, that they are in physical possession of a valid arrest warrant of 2005 for Johnny McMahon, which is belied by the record as the Clerk of the Eighth Judicial Dist. Court does not possess any such document.

STATEMENT OF CASE/ FACTS

The troubling back stories and extra-judicial events which led up to the State Respondents beginning this campaign of lies and deliberately engaging in fraud upon the court, to cover up their ruse, Knowing full well that the arrest warrant of 2005 for Johnny McMahon was the smoking gun evidence, which goes to the gravamen of the case, pursuant to the controlling enacted statute NRS 173.035, and absent the said arrest warrant, being secured by the State Respondents, the case constitutes as a void judgment.

(1). The unwarranted arrest, on Dec. 12; 2005, by LVMPD rogue cop, NL, going outside of the scope of his official capacity to set up Mr. McMahon, knowing full well that an NCIC/SCOPE Warrant number was not outstanding for Mr. McMahon, using witness accuser, E.H., to call Mr. McMahon to lure him out of the house, into the public, to effectuate the warrantless arrest, on private property, for expired license plates on Dr. P.C. vehicle, a vehicle not owned, or registered, to Mr. McMahon, a non-moving municipal citation, which in 99.999% of the time results in a verbal warning, or a citation is issued. Mr. McMahon was transported to CCDC. (See Ex#2).

(2). Between the unwarranted arrest, and 48 hours later, Mr McMahon retained attorney, Paul Wommer, as counsel. Mr. McMahon was not afforded a probable cause Gernstein hearing by Justice Court, and reflective of the TCR booking sheet an arrest warrant NCIC/SCOPE did not exist. (See Ex#11).

(3). At the Initial Appearance, on Dec. 15, 2005, retained attorney, Paul Wommer, failed to challenge the unwarranted arrest, and that a probable cause Gernstein hearing was not conducted by Justice Court Magistrate, KBH, the State Clark County District Attorney's Office failed to present a proper charging instrument to hold Mr McMahon to any crime, the court released Mr. McMahon on his own recognizance, as opposed to dismissing the cause without prejudice, allowing the State to properly refile the cause pursuant to NRS 173.035. Again, attorney Wommer failed to object and challenge the want of subject-matter jurisdictional defect.

(4). On Dec. 15, 2005, and Jan. 11, 2006, attorney Wommer filed two Discovery Requests for the State Clark County District Attorney's Office to produce all exculpatory evidence, including a copy of a valid arrest warrant of 2005 for Johnny McMahon, yet to date no such document has been produced by the State Respondents. (See Ex# 14).

(5). Between Dec. 15, 2005 to April 06, 2006, the bindover date from Justice Court to the Eighth Judicial District Court, the State Clark County District Attorney's Office failed to establish subject-matter jurisdiction, pursuant to NRS 173.035, by properly refiling the case in a timely manner and pursuant to the legislative language as: "immediately" "forthwith" calling NRS 173.035 a curative/corrective statute based upon clerical errors, or inadvertence, giving

(5). (Con't): State prosecutors another bite at the apple, as the State Attorney General lobbied the Senate Judiciary Committee for enactment of the statute. The language of NRS 173.035 and the related statutes are clear. First: a prosecutor must present to the court of jurisdiction, justice court, an affidavit of probable cause from the witness accuser(s) accompanied by a Declaration of Warrant/Summons for the courts consideration of the issuance of an arrest warrant; Two: Should an arrest warrant issue pursuant to NRS 171.152 and NRS 171.178 an original copy to be presented to the Clerk of Court and a copy issued to the arresting party. Pursuant to NRS 173.205 Return of warrant and summons; reissuance. (1) The peace officer executing a warrant shall make return thereof to the court. At the request of the Attorney General acting pursuant to a specific statute or the district attorney any unexecuted warrant must be returned and canceled. (3) At the request of the attorney general acting pursuant to a specific statute, or the district attorney, made at any time while the indictment or information is pending, a warrant returned unexecuted and not canceled or a summons returned unserved or a duplicate thereof may be delivered by the Clerk to a peace officer or other authorized person for execution or service. See Tellis v. Sheriff of Clark County, 85 Nev. 557, 459 P2d 364 (1969). NRS 173.155 Form of Warrant; fixing and endorsement of amount of bail. The form of the warrant shall be as provided in NRS 171.108 except that it shall be signed by the Clerk, it shall describe the offense charged in the indictment or information and it shall command

(5). (Con't): that the defendant be arrested and brought before the court. The amount of bail may be fixed by the court and endorsed on the warrant. The continuation of NRS 173.035 states that the lawfully arrested person shall be brought back to the court of proper jurisdiction, accompanied by legal counsel, and present to the court a proper charging instrument, allowing the defendant to plead, waive, or court to set bail, and defendant to invoke a fast and speedy trial, or; Three: take the matter to a grand jury for indictment. As such, within the 100 day period of time the State Respondents failed to timely and lawfully establish subject-matter jurisdiction to protect the rights of citizens by legally securing a valid arrest warrant to establish jurisdiction over the case and the justice court failed to legally establish jurisdiction over Mr. McMahon, which has been addressed in a long line of venerable cases by the Nevada Supreme Court underpinning NRS 173.035, as the Court declared in the law of the case that failing to secure a valid arrest want prior to refiling the case constitutes as a void judgment and amounts to a constitutional structural error and cannot be waived, inferred, or cured and that the onus is on the reviewing court to certify the question as to Title III Jurisdiction to grant legal standing.

(6). Based upon the want of subject-matter jurisdiction, as neither the State, nor the courts, lawfully obtained the power and authority to act pursuant to NRS 173.035, which mandates that justice court cannot lawfully obtain jurisdiction of a case

(6).(Con't): absent compliance of NRS 173.035 unless; First: the allegations of the State are timely and properly presented; Second: A sworn criminal information "must" be presented to a lawful court to create a cause of action; Third: Jurisdiction cannot be established by the State unless the appropriate charging document(s) have been presented to an accused in a lawful court of jurisdiction by the movant party; and Fourth: Justice Court has a duty to the accused to either dismiss or lawfully accept jurisdiction.

(7). When Mr. McMahon and attorney Wommer appeared at the Preliminary Hearing, on March 23, 2006, the State had yet to legally establish subject-matter jurisdiction, pursuant to NRS 173.035 and NRS 34.728. Attorney Wommer, acting in the capacity of a second prosecutor, failed to challenge the State and Justice Courts legal standing to further prosecute and even hear the case. Clark County Deputy District Attorney, C.K., began this campaign of lies and fraud upon the court by asserting in colloquy with justice court magistrate, KBH, that McMahon was in arrest warrant status since April, 2005. The court strongly rebutted this allegation declaring that an arrest warrant was not a part of the Clerks file. Again, attorney Wommer continued to stand mute, failing to Order the State to produce their copy of the arrest warrant document, pursuant to NRS 171.152. The court went on to severly chastise DDA, C.K's, office for possessing a modus operandi of engaging in the practice of failing to timely secure a proper charging instrument, yet the court stated that the defendant could be released from

(7). (Con't): custody without any consideration of charges, yet the court stopped short of protecting Mr. McMahon's rights to Due Process and Equal Protection in dismissing the case with prejudice as a void judgment, pursuant to NRS 173.035, and again the stage was set for attorney Wommer to simply motion the court in limine to dismiss the case with prejudice for want of subject-matter jurisdiction. Mr. McMahon strongly asserts that DDA, C.K., acting on behalf of the State knowing full well that absent the existence of an arrest warrant the court could/should declare the case as a void judgment, as the arrest warrant goes to the gravamen of the case pursuant to NRS 173.035, as such there is no legal question in dispute that the Clark County District Attorney's Office gave DDA, C.K. her marching orders to commit fraud upon the court and this arrest warrant ruse was a plan, scheme, and design by the State to obfuscate the facts and usurp the legal process, knowing full well that attorney Wommer would not challenge the jurisdictional defect. Again, as opposed to the justice court protecting Mr. McMahon's guaranteed constitutional rights to a procedurally full and fair trial under Due Process and Equal Protection, the court absent the lawful power and authority to act, bound the instant case over to the district court, declaring that judge Saitta could deal with the jurisdictional matter. (See Ex.# 17).

(8). In a pre-trial hearing attorney Wommer filed a motion of Outrageous Government Misconduct, yet again failed to address the jurisdictional defect, and judge Saitta failed to even

(8).(Con't); address subject-matter jurisdiction.

(9). In July, 2007, State DDA, G.O., presented a plea agreement to Mr McMahon for one count of statutory sexual seduction, based upon the fact that the manufactured sex case was devoid of any corroborating, or forensic evidence to support a sexual assault case as to witness accuser E.H.'s testimony, especially in relation to the FBI's threat to E.H, working against juvenile imprisonment, and based upon Mr McMahon's record, the case was now a probational release, yet attorney Wommer rendered faulty legal advice, claiming that private investigator, J.T., would secure the computer IT data from Mr McMahon's computer and Sprint cell phone statement, etc. to impeach E.H. Had Mr McMahon accepted the plea agreement he would have invoked Alford plea, been released on probation, avoided prison, fired attorney Wommer, and retained a competent law firm to challenge the jurisdictional defect and this, manufactured farce and sham sex case, would have been tossed in the judicial trash can 18 years ago. Mr. McMahon would subsequently find out that the DNA buccal swab, illegally obtained by Det. A.C. on Oct. 04, 2004, lying to Mr McMahon, in a voluntary statement interview, claiming that he had talked to witness accuser, E.H., and that she claimed that she was pregnant, which was a lie, as testified by Det. A.C. at trial, as E.H. intentionally evaded Det. A.C. for a year before giving a voluntary statement in Oct. 2005, claiming that she had a menstural period discharge on Mr McMahon's bedding when he was out of town, the bedding was confiscated by LVMPD on

(9).(Con't): Oct. 04, 2004, however at trial rogue prosecutors, DD's, G.O and P.S., created an unlevel playing field and moved the goalposts by using DNA Forensic expert, R.D., from the Utah Crime lab testifying that the commingled blood DNA on the defendant's bedding, now States Ex's #32-33 was 1-38,000 against the defendant, and the rogue prosecutors engaged in fraud upon the court asserting the blood DNA evidence was the by-produce from the initial hymenal tear of EH by the defendant in June, 2004. Not only did the rogue prosecutor's mislead the jury as to the true DNA evidence, which again, was confiscated some (4) four months later on Oct. 2004, inferring to a jury, whos passions were already inflamed, based upon the misjoinder of the cases, inferring prior bad act evidence, the rogue prosecutors misled the jury to believe that Mr. McMahon, R.M., and E.H. slept on bloody bedding for 4 months. However, more egregious the rogue prosecutors, and attorney Wommer, both fraudulently concealed the exculpatory faulty DNA evidence of E.H.'s voluntary statement interview whereby she had a menstural period discharge on the said bedding. (See Ex's #3, 5, 17, 25, 27 and 28).

(10) Pursuant to NRS 176.0918(3)(c) the bloody bedding, States Ex's #32-33, still in possession of State, can be forensically analyzed for genetic marker typing to determine the true blood evidence as being: (1) EH's hymenal blood sac discharge; or (2) E.H's menstural blood discharge? Which would exhonerate Mr McMahon as a suspect to a sex act, according to attorney Barry Scheck of the Innocence Project, as such it's not too late for the truth to be brought forward for the sake of the justice owed to the case and to Mr McMahon.

(11) By now Mr. McMahon was throughally convinced that the FBI, gaming competitors, attorney Wommer, Clark County Dist. Attorney's Office and Judge Barker were in on the fix to put Mr. McMahon in prison for life, to keep him from ressurrecting Flying Saucer Resorts and Rapid Transit System, restructing LV Blvd., while destroying surrounding casino resorts bottom line revenue stream, as JEMc, with the strategic partners, would control the inbound traffic of hospitality and gaming revenue on Las Vegas Blvd. by 2010, and with strategic partners would control the strip property in a REIT by 2020, according to the business plan and feasibility study conducted by Piercy, Bowler, and Nye, as such business was in play, not some manufactured sex case. (See Ex's #7, 8, and 86).

(12) In a status check before Eighth Judicial District Court Honorable Judge, Elizabeth Halverson, whereby the court severly chastized attorney Wommer for failing to sever the misjoined cases and address the arrest warrant and jurisdictional defect. Attorney Wommer requested a side bar with DDA, G.O. and subsequently both went into chambers with Judge Halverson, as Mr. McMahon waited at the defense table.

(13). Subsequent to judge Barker being assigned to the case and at sentencing in allocution to the court fired/legally discharged retained attorney Wommer as counsel, the court created a clear conflict of interest by appointing attorney Wommer, his friend from the DA's office, back onto the case allowing attorney

(13). (Con't): Wommer to constructively hijack the first-direct appeal, to both profit and cover up his 30 plus errors and omissions at the lower level, as well as committing fraud upon the Nevada Supreme Court in his filing forms, claiming that Mr McMahon retained him as appellate counsel, then again committed fraud upon the district court, in his Motion for Appointment of Counsel, claiming that he was appointed at the lower level, as opposed to being retained as counsel by Mr. McMahon for $25,000. Mr McMahon filed (3) pro se motions to the court to: (1) Order Wommer to withdraw as counsel based upon a clear conflict of interest; (2) Appoint a conflict-free counsel, or; (3) Allow petitioner to proceed pro se in a Faretta setting. The court stayed the motions and appointed Wommer as appellate counsel. Mr McMahon filed pro se petitions to the Nevada Supreme Court to arrest the case and Order attorney Wommer disqualified, instead the Court under Rule 46(b) held that the pro se petitions were fugitive documents, and further advised Mr. McMahon to consult with attorney Wommer to resolve the issue. Which runs afoul of the Courts Order ADKT#411 mandating that appellate attorney's shall communicate and correspond with clients in order to correct and perfect the first-direct appeal to the benefit of the petitioner. Mr McMahon additionally filed complaint on Wommer to the Nevada State Bar Assn. pursuant to Rule 8.4 of Professional Rules of Conduct, and also to the Commission on Judicial Discipline on Judge Barker, all to no avail. (See Ex's #46, 47, 51, 52, 53, 57, 60, 61 and 65).

(14) The egregious fraud and the cumulative effect of the errors

(14).(Con't): and omissions, at trial, continued well into the first-direct appeal of the unauthorized appeal of attorney Wommer, as the State, in their answering brief, failed to serve attorney Wommer, or Mr McMahon, a copy in their Certificate of Service, instead, by design, to Keep Wommer from rebutting their salacious legal fiction and case law and authority which beats a path to nowhere and points precisely in the opposite direction, sent their copy of the answering brief to the law firm of Christalli and Saggese, who had absolutely no involvement in the case, a violation of NRAP (8)(ii) rendering their ex parte brief as null and void, which equally attaches to Nevada Supreme Courts Order of Affirmance. (See Ex # 57).

(15). Judge Barker, failing to Recuse sua sponte, Ordered a Strickland evidentiary hearing, on Dec. 16, 2011, and subpoenaed attorney Wommer from the bench to appear with Mr McMahon's case file. Prior to the said hearing, DDA's G.O. and C.B., went to Det. A.C. office and retrieved the bogus Declaration of Warrant/Summons and faxed a copy to Mr McMahon's legal counsel, Rochelle Nguyen (now a Nevada State Senator), and prior to the said hearing the DDA's conducted a hallway session with attorney Wommer, to load his lips as to their version of the case and facts, absent the courts permission, or the presence of counsel Nguyen, as testified by attorney Wommer, who also claimed that he lost Mr. McMahon's file. The DDA's stepped up their degree of unfairness and fraud by parading around the bogus Declaration of Warrant/Summons asserting that the bogus document was a valid arrest warrant, and the court failed to physically inspect the said document to determine its probative

(15). (Con't): value reflective of the Courts Finding of Facts, Conclusions of Law Order of April 01, 2012, whereby the court declared that a valid arrest warrant of 2005 existed and that subject-matter jurisdiction was addressed, and attorney Wommer's representation was tactical and strategic, all erroneous claims, as Wommer even failed to recall being retained for $25,000, failed to recall Mr McMahon retaining private investigator, J.T., for $5,000 and boasted about his legal resumé as a former DDA for Clark County, a federal deputy attorney, and being in private practice with a good understanding of the law. However, the State DDA, C.B., stepped up their campaign of lies and fraud upon the court, to now engage in criminal violations of forgery, by forging and fraudulently affixing the signature of magistrate, KBH's, to a TCR document, in stark contrast to the original TCR issued to Mr McMahon at CCDC on Dec. 12, 2005. The States uttered cut and paste TCR replete with white out marks, and claiming that a rebooking process occurred, which is belied by the record, to overcome the occurrence of a Gernstein probable cause claim. Glaringly, the forged affixed signature of magistrate, KBH's, runs underneath pre-printed boxes, off the line, which defies forensic science. (See Ex's# 11, 62 and 63)).

(16). Subsequent to the farce and sham hearing, Mr McMahon forwarded a motion and the relevant TCR documents to justice court magistrate, KBH, to authenticate and verify her signature, on the TCR document as true and signed by the court. However, the court refused to verify her signature. (See Ex's# 74(A)-(E)).

(17). Attorney Nguyen motioned the Nevada Supreme Court pursuant to Mann v State supra requesting a new hearing based upon attorney Wommer's 6th Amendment IAC claims of errors and omissions occurring at the lower level and the fact that attorney Wommer's testimony was in stark contrast to his subsequent testimony in his criminal trial in the U.S. District Court. Notwithstanding the fact that the Nevada Supreme Court was well aware of attorney Wommer's impeachment.

(18). Mr McMahon fully realizing by now that the forces of evil, to secure a conviction, were working overtime, as such Mr McMahon decided that being honest and playing fair by the rules wasn't working, decided to fight fire with fire and contacted a friend, Kelly Capp, a former IRS investigator who agreed to have attorney Wommer audited and investigated, which led to his indictment, prosecution and conviction in the U.S. District Court before Honorable Judge, Gloria Navarro. In Wommer's criminal defense of "Diminished Capacity" claiming, that based upon a snow skiing accident in 1991 he sustained frontal-lobe brain damage, rendering him unable to know and understand the law, in stark contrast to attorney Wommer's testimony in the Strickland evidentiary hearing, whereby he claimed that he had a working knowledge of the law. Moreover, when Mr. McMahon retained him as legal counsel for $25,000 Wommer boasted about his legal resumé and knowledge of the law. Wommer's expert witness, Dr. Mortillo, a neuropsychologist, who diagnosed Wommer, claiming that Wommer suffered from sound-reasoning and logic. However, the court didn't buy his bullshit defense and

(18).(Con't): sentenced Wommer to 41 months in federal prison for fraud, money laundering and tax evasion. (See Ex # 68).

(19). Prior to Wommer checking into federal prison, to serve his sentence, Mr. McMahon was confined in the Northern Nevada Correctional Center, in Carson City, NV. Sometime thereafter a newly arriving inmate arrived, Mr. Halverson, who was convicted of assaulting his wife, judge, Elizabeth Halverson, confronted Mr McMahon with some revealing first-hand information. Mr Halverson informed Mr McMahon that attorney Wommer and Deputy District Attorney, Glen O'Brien, had an in-chambers conference with his wife, judge, Halverson and attorney Wommer declared that both he and the State DA's office were co-operating with the FBI, who had an ongoing investigation of Mr. McMahon for years as to being a serial rapist but couldn't secure the evidence, as such Wommer requested that the court assist them in the case to secure a conviction of Mr McMahon to get him off the streets. Mr Halverson said his wife felt intimidated and being coerced and subsequently locked herself in chambers and called the FBI. He said the rest is a matter of public record, in judge Halverson being removed from the court and ensuing lawsuits. In conclusion, Mr Halverson assured Mr McMahon that he would be willing to testify in court to the information.

(20) So now that the missing pieces of the puzzle were falling in place, Mr McMahon contacted friends in the Federal prison in Leavenworth, Kansas, to arrange a private greeting

(20).(Con't): party, as such when attorney Wommer checked into Federal prison in Butner, N.C., he was greeted in a coup de grâce fashion to disclose who else was in on the fix to secure a conviction of Mr. McMahon, and who funded the fix and how much money was paid to each party? While Wommer was pissing his pants he claimed that the FBI and the surrounding gaming Mandalay Group funded the fix giving himself, District Attorney's David Rogers, and Steven Wolfson, and judge David Barker, $100,000 dollars. The inmates thereafter gave Wommer a new prison moniker, Paul "The Worm" Wommer, who assured the group that he would testify for Mr McMahon in court when he files a tort claim. Stay tuned.

(21). When Federal Public Defender, Jonathan Kirshbaum, was assigned the instant case, he focused solely on Wommer's 6th Amendment IAC claims as a ground, failing to challenge the subject-matter jurisdiction, faulty DNA evidence, and fraud upon the court by State Respondents. Attorney Kirshbaum did secure Wommer's complaint file from the Nevada Bar Assn. claiming that it was thicker than a New York phone book going back decades with complaints from clients and appointed defendants claiming that attorney Wommer failed to communicate or correspond with them at trial, investigate the case, and their post-conviction appeals, several family members complained that attorney Wommer requested more money from them to assist their loved ones on appeal, and more egregious, which should have resulted in Wommer being sanctioned and disbarred decades earlier, several females filed

(21). (Con't): complaints alleging that attorney Wommer tried to bribe them with the exchange for sexual favors to assist tried loved ones on appeal. Not only is Paul Wommer a pathetic human being who couldn't find his ass with a guide dog, he's a bonifide pathological liar, who like the majority of actors in the instant case, if you'd hook them up to a polygraph machine they'd break the needle, the machine would short-circuit and blow up. Attorney Wommer set back the trust and confidence in the attorney/client relationship by several decades to come, which equally attaches to the confidence in every case Wommer was involved with, as attorney Wommer was protected in 6th Amendment IAC claims, from the State district courts to writs of certiorari to the United States Supreme Court, by design, as lawyers protect lawyers based upon tort claims and mal practice insurance premiums being adversely affected. (See Ex #10).

(22). In the mid-70's Mr McMahon was confronted by neighbor, Benny Martinez, a bartender at a local gay club, the Le Cafe. Benny informed Mr. McMahon that a drag queen called, "Miss-Nomer" who was performing at the Le Cafe, had mentioned my name in a conversation. Miss-Nomer was from Florida and a former lover of FBI Director, Jay Edgar Hoover, also an infamous drag queen, who would have tea parties and boast the bad guys, gangsters, mobsters and bank robbers apprehended over his tenure as FBI Director. Miss-Nomer mentioned the infamous bank robbery crew the "Gentlemen Bandits" in the 70's out of

(22). (Con't): Phoenix, AZ., who robbed 32 banks, an armored car netting several million dollars in cash, and was involved in the murders of a couple FBI informants. The crew boss, Johnny McMahon, and his partner, Michael McGuire, were busted on a Fluke, in Phoenix, and the FBI set them up in a bogus armed robbery case of a local grocery store by their apt. for $900.00 and secured a conviction, then scrubbed the record of the "Gentlemen Bandits". When Mr. McMahon and his attorney, Lou Weiner, met with Miss-Nomer he/she confirmed the facts. Sometime subsequent to the meeting bartender, Benny Martinez, was murdered and Miss-Nomer disappeared.

Accordingly, with the degree of troubling back stories and the FBI's relentless vengeance and retaliation, reflective of their infamous m.o. to: "Always get our man," coupled with the events which transpired in the lower level, to secure a conviction, using faulty DNA evidence, and in post-conviction, with judge Barker creating a clear conflict of interest in appointing attorney Wommer, a retained and legally discharged trial counsel at sentencing, to constructively hijack Mr McMahon's first-direct appeal. Whereas, the compelling and overwhelming prima facie evidence on file in support of the degree of collusion, fraud upon the courts, obstruction of justice, criminal forgery and RICO Act Violations are glaring.

Mr. McMahon would challenge any judge, lawyer, or professor of law to compare any case, to the degree of cumulative errors and omissions with the monetary loss of untold billions of dollars in future earnings. Whereas, by now this reviewing court should either be convinced that Mr McMahon did not receive a procedurally full and fair trial and first-direct appeal, or this court needs to seek counseling. To even believe that an arrest warrant was ever a part of the clerks file, or that any court, including this Court, or the Nevada Supreme Court, physically inspected requisite evidence to certify the question as to subject-matter jurisdiction and legal standing, reflective of the courts opinion and order, which renders this case as a void judgment ab initio as a matter of law. Whereas, absent the existence of a valid arrest warrant of 2005 for Johnny McMahon it is IMPOSSIBLE to obtain legal standing under Title III Jurisdiction.

Wherefore, Petitioner's Request for Admissions pursuant to Fed. R. Civ. P. Rule 36 and Hearing Requested with Petitioner Present be Granted, as after 19 years of addressing State government lies and fraud upon the court by State Respondents, this case is ripe for adjudication and overdue for a neutral impartial fair-minded jurist to put this farce and sham case to an end, and dispense the justice owed to the case an to Mr. McMahon.

IT IS SO PRAYED.

Dated: day of January, 2026.

Respectfully submitted,

Johnny E. McMahon

Johnny E. McMahon

Pro se