

No. 25-268

IN THE SUPREME COURT
OF THE UNITED STATES

ALEX EMRIC JONES, et al.,

Petitioners,

v.

ERICA LAFFERTY, et al.,

Respondents.

On Petition for a Writ of Certiorari
to the Supreme Court of Connecticut

**BRIEF OF ROBERT WYN YOUNG AS *AMICUS*
CURIAE OPPOSING CERTIORARI AND
SUPPORTING NO PARTY**

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IDENTITY AND INTEREST
OF THE *AMICUS CURIAE*

The undersigned *amicus curiae*, Robert Wyn Young, is a 30~year state and federally~licensed attorney, recently admitted to the Supreme Court Bar, who is oathbound to support and defend the United States Constitution.¹

In January 2024, the undersigned discovered unequivocal evidence that Alex Jones threw the defense of the Connecticut Sandy Hook defamation cases with his first responsive pleadings. Thereafter, and through diligent research, the undersigned discovered that Alex Jones' collusive fraud in the Connecticut Sandy Hook defamation suits was one

¹ No counsel for a party authored this *amicus* brief in whole or in part, and no such counsel nor any party made a monetary contribution intended to fund the preparation or submission of this brief. The undersigned *Pro Se Attorney Amicus Curiae*, Robert Wyn Young, established a GiveSendGo campaign in January 2025 (givesengo.com/wyn-young) to help fund the undersigned's public advocacy case described herein. To date, said GiveSendGo campaign has raised \$2,701.00 via 36 donations. The Trust by Beau Jangles, West Columbia, TX, Trustee "Kelly" (last name unknown), made a separate \$2,500.00 cash donation/contribution in September 2025 designated to cover costs and expenses associated with the preparation and submission of this *amicus* brief. On September 29, 2025, the undersigned *Pro Se Attorney Amicus Curiae*, Robert Wyn Young, gave counsel of record for the parties, Ben C. Broocks (bbroocks@broockslawfirm.com) and Alinor Clemans Sterling (asterling@koskoff.com) email notice of intention to file this *amicus* brief.

part of a broader, two~part and **treasonous** conspiracy to undermine or destroy both our First and Second Amendments. Upon discovering confirming probable cause evidence of the two~part and **treasonous** conspiracy, the undersigned became duty~bound to expose it.

On November 1, 2024, the undersigned began publicly pursuing ~ and also, thereafter, litigating ~ a public advocacy case to expose the two~part and **treasonous** Alex Jones/Sandy Hook conspiracy. The undersigned now submits this brief, as *amicus curiae*, in opposition to the Petition for Certiorari and in support of no party.

SUMMARY OF ARGUMENT

In the Related Proceedings section at pages *v* and *vi* of his Petition for Certiorari, Alex Jones failed to disclose the case style or number for *Erica Lafferty, et al. v. Alex Emric Jones, et al.*, Case No. 3:18-cv-01156 (D. Conn.) (removed from Conn. Super. Ct.). The reason Alex Jones failed to identify the removed *Lafferty* federal case, which proceeded in the U.S. District Court for the District of Connecticut for more than four (4) months in 2018, is simple, though perhaps not immediately obvious. The U.S. District Court **remand file** for Case No. 3:18-cv-01156 (Trial Ct. Dckt. 112.00) contains unequivocal and operative evidence of **collusive fraud** producing the outlandish \$1.3 Billion free~speech~chilling Connecticut state court default judgment at issue herein.

The shocking truth is that Alex Jones purposely threw the defense of the Connecticut defamation actions with his very first responsive pleadings. On July 13, 2018, Jones removed the matter of *Erica Lafferty, et al. v. Alex Emric Jones, et al.*, Conn. Super. Ct. Case No. UWY-CV-18-6046436-S, to the U.S. District Court for the District of Connecticut. (Case No. 3:18-cv-01156 Dckt. 1 and Trial Ct. Dckt. 106.00) On July 20, 2018, Jones filed a potentially~dispositive, First ~Amendment~based Special [Anti~SLAPP] Motion to Dismiss the removed *Lafferty* case. (Case No. 3:18-cv-01156 Dckt. 21 and Trial Ct. Dckt. 112.00)

But Alex Jones deprived the U.S. District Court of subject matter jurisdiction to consider and rule on his Special [Anti~SLAPP] Motion to Dismiss by failing to claim federal question jurisdiction, under 28 U.S.C. § 1331, in his Notice of Removal of the *Lafferty* First Amendment lawfare case. Jones claimed only diversity jurisdiction, under 28 U.S.C. § 1332, but diversity of citizenship did not even exist on the face of the *Lafferty* Complaint. (Case No. 3:18-cv-01156 Dckt. 1 and Trial Ct. Dckt. 106.00)

This failure to claim federal question jurisdiction could not have been the result of mistake or malpractice by Jones and his attorneys because, on July 31, 2018, Jones filed a second and similarly~defective Notice of Removal in a related and nearly identical Sandy Hook defamation suit, *William Sherlach v. Alex Emric Jones, et al.*, Case No. 3:18-cv-

01269 (D. Conn.) (removed from Conn. Super. Ct.). (Case No. 3:18-cv-01269 Dckt. 1 and Trial Ct. Dckt. 110.00)

The Connecticut Sandy Hook Plaintiffs didn't even need to respond to Alex Jones' Special [Anti~SLAPP] Motion to Dismiss; they needed only to and, on July 31, 2018, they did move to remand *Lafferty* back to state court for lack of subject matter jurisdiction in the federal court. (Case No. 3:18-cv-01156 Dckt. 37 and Trial Ct. Dckt. 112.00) The District of Connecticut granted Plaintiffs' motion, remanded *Lafferty* to Connecticut state court, and terminated Alex Jones' unanswered Motion to Dismiss as moot. (Case No. 3:18-cv-01156 Dckt. 58 and Trial Ct. Dckt. 112.00)

Back in state court, and over the next three (3) years, Alex Jones engaged in sanctionable misconduct ultimately resulting in a default on liability issued on November 15, 2021. (Trial Ct. Dckt. 574.00) But, even if Alex Jones is afforded "plausible deniability" for intentional fault in invoking state court sanctions, including default, there is **no plausible deniability** for his failure to claim federal question jurisdiction for First Amendment cases he removed to federal court and defended as such in a mere show of a fight.

Alex Jones colluded to deprive a U.S. District Court of subject matter jurisdiction to consider and rule on a First~Amendment~based special motion to dismiss in what Jones, himself, characterized as a "SLAPP" suit, a Strategic Lawsuit Against Public

Participation. (Case No. 3:18-cv-01156 Dckt. 21 and Trial Ct. Dckt. 112.00)

In the Related Proceedings section of his Petition for Certiorari (pages *v* and *vi*), Alex Jones failed to list the removed and remanded *Lafferty* federal case, No. 3:18-cv-01156, in violation of Supreme Court Rule 14.1(b)(iii), for the simple reason that a brief review of the *Lafferty* U.S. District Court remand file (i.e., the 404~page, 61~entry case file for Case No. 3:18-cv-01156, Trial Ct. Dckt. 112.00) would promptly reveal unequivocal evidence of the litigating parties' **collusion** that eventually produced the outlandish, free~speech~chilling \$1.43 Billion (now \$1.3 Billion) **fraudulent** Connecticut state court default judgment.

The parties' collusive **fraud on the courts** began in the Connecticut proceedings, has continued (between the same parties/litigants) through the course of Alex Jones' Chapter 7 bankruptcy case, and is now brought to and imposed upon the Supreme Court of the United States. If the Court renders **any** decision in this case without awareness and consideration of the unequivocal and operative evidence of **collusive fraud** contained in the *Lafferty* U.S. District Court remand file, then incalculable damage will be done to the integrity of our federal judicial system and to the core and foundational rights of the American Republic, our First and Second Amendments.

**THE AMICUS CURIAE'S PUBLIC
ADVOCACY CASE**

1. Background

The case before the Court arises from an alleged final judgment of approximately \$1.43 Billion entered against Alex Emric Jones on December 22, 2022, in consolidated Connecticut state court defamation cases arising from or related to an alleged mass school shooting in Sandy Hook, Connecticut, occurring on December 14, 2012, and styled as *Erica Lafferty, et al. v. Alex Emric Jones, et al.*, UWY-CV-18-6046436-S; *William Sherlach v. Alex Jones, et al.*, UWY-CV-18-6046437-S; and *William Sherlach v. Alex Emric Jones, et al.*, UWY-CV-18-6046438-S (herein also collectively referred to as “the Connecticut defamation cases” or as “the consolidated Connecticut defamation cases”).²

On appeal by Jones, the Connecticut Appellate Court ruled that: “The judgments are reversed only as to the plaintiffs’ CUTPA claim and the cases are remanded with direction to vacate the court’s award of \$150,000,000 in punitive damages pursuant to CUTPA; the judgments are affirmed in all other respects.” *Erica Lafferty, et al. v. Alex Emric Jones, et al.*

² All references to the “Trial Ct. Dckt.” pertain to the trial court Case Detail/Docket for *Erica Lafferty, et al. v. Alex Emric Jones, et al.*, UWY-CV-18-6046436-S (viewable at: <https://civilinquiry.jud.ct.gov/CaseDetail/PublicCaseDetail.aspx?DocketNo=UWYC V186046436S>). All citations to “Bankr. Dckt.” reference the case docket in Alex Jones’ Chapter 7 bankruptcy proceeding, Case No. 22-33553.

al., No. AC 46131, slip op. at 62 (Conn. App. Ct. December 10, 2024). Thus, the Connecticut Appellate Court reduced the alleged final judgment against Alex Jones in the consolidated Connecticut defamation cases from approximately \$1.43 Billion, to approximately \$1.3 Billion.

In late 2023 or early 2024, the undersigned heard Alex Jones and Attorney Norm Pattis speaking in a cagey way on Infowars about their Connecticut Sandy Hook appeal, and the undersigned decided to look into it. In then reviewing the appellate and trial court dockets in the matter of *Lafferty, et al. v. Jones, et al.*, Conn. App. Ct. No. AC 46131, appeal from Superior Court Docket No. UWY-CV18-6046436-S (both also fully cited, *supra*), the undersigned promptly discovered **unequivocal** evidence that Alex Jones threw the defense of the Connecticut Sandy Hook defamation cases with his very first responsive pleadings (i.e., by deliberately failing to claim federal question jurisdiction when removing the related *Lafferty* and *Sherlach* Connecticut First Amendment lawfare cases to federal court). Indeed, as the undersigned came to learn in conducting further and diligent research, Jones' doing so was part of a broader, two~part and **treasonous** conspiracy to undermine or destroy both our First and Second Amendments.

The evidence, namely, (1) Alex Jones' case filings in the Connecticut defamation cases, and (2) network, cable, and local TV station video footage and

pictures from the day, time, and location of the alleged Sandy Hook mass school shooting event, provides probable cause for reasonable minds to conclude that Alex Jones' "Capitulation & Betrayal" in the Connecticut Sandy Hook cases was the second and necessary stage of a massive, two~part, and **treasonous** conspiracy. In the first part, the horrific Sandy Hook school shooting story was concocted to turn legislators, laws, and the American people against the Second Amendment. In the second part, Alex Jones and others took purposeful dives on bogus defamation claims to hand the Connecticut Sandy Hook Plaintiffs a massive win that chills free speech, investigative journalism, and public participation in the political process. Indeed, Jones' loss/the outrageous \$1.43 Billion damages judgment (reduced by the Connecticut Appellate Court to \$1.3 Billion) appears largely designed to "scare off" further and proper scrutiny of the alleged Sandy Hook mass school shooting.

Upon discovering confirming probable cause evidence of the two~part and **treasonous** Sandy Hook conspiracy, the undersigned became duty~bound, as a state and federally~licensed attorney, who is oathbound to support and defend the United States Constitution, to **expose** it. On November 1, 2024, the undersigned began publicly pursuing a public advocacy case to expose the two~part and **treasonous** Sandy Hook conspiracy.

This *amicus* brief relates to the second part of the **treasonous** Sandy Hook conspiracy which is chiefly embodied in the blatantly~fraudulent \$1.3 Billion Connecticut state court default judgment giving rise to the instant Petition for Certiorari. The undersigned does not seek to submit evidence or to prove herein that the underlying alleged December 14, 2012, Sandy Hook mass school shooting was a hoax. Probable cause evidence in that regard is already in the public record in the form of news camera footage from the day, time, and location of the alleged event; and the **fraud** and/or **treason** associated with the underlying event may, should and, if justice prevails, will be dealt with in separate proceedings. The undersigned simply seeks to alert and point the Court to plain and operative court file evidence of **fraud** or **collusion** producing the \$1.3 Billion Connecticut state court default judgment at issue herein.

2. Attempted Intervention and Appeal in Alex Jones' Chapter 7 Bankruptcy

In late February and early March 2025, the undersigned emailed the Chapter 7 Trustee in Alex Jones' bankruptcy, *In re: Alexander E. Jones*, Bankr. S.D. Tex. Case No. 22-33553, written explanatory statements, evidentiary submissions, and Legal Notices & Demands regarding (1) the fraudulent nature of the \$1.3 Billion *Lafferty* Connecticut state court default judgment debt chiefly giving rise to Jones' bankruptcy, and (2) the need and legal

requirements for investigation and reporting of the credible and peer-reviewed allegation of fraud presented. (Bankr. Dckt. 1120-4 through 1120-15)

The Chapter 7 Trustee did not respond, in any substantive way, to the undersigned's written explanatory statements, evidentiary submissions, or Legal Notices & Demands presented on behalf of the American people and with respect to matters of **public importance**, namely, the integrity of the federal judicial system and the viability of the First Amendment.

It, therefore, became incumbent upon the undersigned to promptly seek leave to intervene in Alex Jones' bankruptcy case, No. 22-33553, as a *pro se* litigant, and pursuant to Fed. R. Bankr. P. 2018(a), to protect the undersigned's interests as a United States citizen and state and federally-licensed attorney in ensuring: (1) the integrity of the federal judicial system; (2) the protection of the First Amendment to the United States Constitution; and (3) the efficacy of the undersigned's efforts in fulfilling the undersigned's duties to support and defend the Constitution. These legitimate and substantial interests were and, to present, are **not** being adequately represented by the existing parties in Alex Jones' bankruptcy.

Accordingly, on March 19, 2025, the undersigned filed a Motion for Leave to Intervene to Present Evidence of Fraudulent Judgment in Alex Jones' Chapter 7 bankruptcy, Case No. 22-33553.

(Bankr. Dckt. 1120) On April 22, 2025, the Bankruptcy Court issued an Order Denying Motion for Leave to Intervene (Bankr. Dckt. 1129) on the basis of lack of standing, i.e., according to the Bankruptcy Court, “Young has no identifiable economic interest in this case.” (Bankr. Dckt. 1129 at 2) The Bankruptcy Court further ruled: “The concerns raised by Young are adequately represented by existing parties and permitting intervention risks causing undue delay in a case that has been pending since December 2022.” *Id.*

On May 4, 2025, the undersigned filed a timely appeal of the Bankruptcy Court’s April 22, 2025, Order Denying Motion for Leave to Intervene. (Bankr. Dckt. 1135) The appeal was designated as *In re Alexander E. Jones, Debtor, Robert Wyn Young, Appellant*, and it was assigned S.D. Tex. Civil Action Case No. 4:25-cv-02057. (Bankr. Dckt. 1138) On May 15, 2025, the undersigned filed a Request for Certification Under 28 U.S.C. § 158(d)(2)(A) to pursue a direct and immediate appeal to the Fifth Circuit Court of Appeals. (Bankr. Dckt. 1144) On May 21, 2025, the undersigned filed a Fed. R. Bankr. P. 8007 Motion for Stay of Proceedings Pending Appeal. (Bankr. Dckt. 1153)

On June 5, 2025, the Bankruptcy Court conducted a status conference/hearing and issued an Order Denying Request for Certification of Direct Appeal and Denying Motion to Stay Pending Appeal “[f]or the reasons stated on the record at the June 5,

2025, hearing”. (Bankr. Dckt. 1164) At Page 12 of the June 5, 2025, status conference/hearing transcript (Bankr. Dckt. 1193), the Bankruptcy Court states:

And for whether the granting of the stay would serve the public interest. I don’t, have no -- nothing showing the public interest, and I’ve read all the papers.

In his Petition for Certiorari, Alex Jones goes the other way, and properly so, by repeatedly emphasizing that the Sandy Hook cases involve “matters of undeniable public concern”. (Pet. Cert. at *i* and 5)

On June 22, 2025, the undersigned filed a Fed. R. Bankr. P. 8007(b) Motion for Stay of Proceedings Pending Appeal in and with the District Court. (Case No. 4:25-cv-02057, S.D. Tex. Dckt. 6)³ On July 23, 2025, the District Court issued an Order denying the undersigned’s Fed. R. Bankr. P. 8007(b) Motion for Stay, ruling, in pertinent part:

Finally, the stay will disserve, not serve, the public interest. The public has a strong interest in the resolution of this case. Young has no right to disrupt that process by staying the bankruptcy case to vindicate his wish to make an indirect and noneconomic point.

³ All references to “S.D. Tex. Dckt. ___” refer to the docket for *In re Alexander E. Jones, Debtor, Robert Wyn Young, Appellant*, S.D. Tex. Civil Action Case No. 4:25-cv-02057.

(S.D. Tex. Dckt. 12 at 2)

Although, in denying the undersigned's Fed. R. Bankr. P. 8007(b) Motion for Stay, the District Court stated: "Young therefore has not shown a likelihood of success on the merits of his appeal of the denial of his intervention[.]" the District Court did not, at that time, dismiss the undersigned's appeal. (S.D. Tex. Dckt. 12 at 2) Accordingly, and to maintain the viability of the appeal, the undersigned was duty-bound to and, on August 7, 2025, did file an Appellant's Brief in Case No. 4:25-cv-02057. (S.D. Tex. Dckt. 13)

On August 19, 2025, before expiration of the 30-day appellee's response period under Fed. R. Bankr. P. 8018(a)(2), and in the absence of any brief filed in opposition, the District Court issued a Memorandum and Opinion (S.D. Tex. Dckt. 14) and an Order (S.D. Tex. Dckt. 15) dismissing the undersigned's appeal, Civil Action No. 4:25-cv-02057. In dismissing the undersigned's appeal, the District Court ruled, in pertinent part, that:

The interest that Mr. Young asserts — his desire to protect the First Amendment and the judicial process — does not given him a practical stake in the bankruptcy proceeding. Recognizing such a self-proclaimed interest would provide a basis for intervention to anyone with a law degree, or, indeed, anyone at all. The Bankruptcy Court did not err by

denying Mr. Young intervention based on his attenuated and non-economic interest.

(S.D. Tex. Dckt. 14 at 2~3)

Both the Bankruptcy Court and the District Court sidestepped and did not directly address the two (2) main issues raised in and by the undersigned's requested intervention and appeal in Alex Jones' bankruptcy, namely:

Whether Alex Jones' obviously~deliberate failure to claim federal question jurisdiction for First Amendment SLAPP lawfare suits he removed to federal court constitutes operative evidence of **fraud** or **collusion** sufficient to mandate the termination of Alex Jones' Chapter 7 bankruptcy case under Section 707(b) of the Bankruptcy Code?

and

Whether interests of **public importance**, namely, the integrity of the federal judicial system and the viability of the First Amendment, are implicated and potentially placed in jeopardy by the provision of bankruptcy relief respecting a notorious and demonstrably~fraudulent \$1.3 Billion free~speech~chilling default judgment against a well~known public figure and purported journalist?

Although Alex Jones listed four (4) separate adversary proceedings relating to his bankruptcy in the Related Proceedings section at pages *v* and *vi* of his Petition for Certiorari, he failed to disclose the case style or number for *In re Alexander E. Jones, Debtor, Robert Wyn Young, Appellant*, S.D. Tex. Civil Action Case No. 4:25-cv-02057, even though the undersigned's requested intervention and appeal arose from and sought to present case file evidence of the fraudulent nature of the judgment entered in the **same** trial court case, *Lafferty*, that is now before the Court. The reason Alex Jones failed to identify the undersigned's civil action appeal is simple: the case file for Case No. 4:25-cv-02057 points to unequivocal and operative evidence of **collusive fraud** producing the outlandish \$1.3 Billion free~speech~chilling Connecticut state court default judgment at issue herein.

ARGUMENT

1. **The \$1.3 Billion Connecticut state court default judgment against Alex Jones is blatantly fraudulent.**

The following **red flags** associated with and pointing to the fraudulent nature of the \$1.3 Billion Connecticut state court judgment are obvious and impossible to miss: (1) a \$1.43 Billion (now \$1.3 Billion) judgment entered in consolidated defamation cases against a public figure/purported journalist, (2) by default and after appearance was made, (3) following a remand (or remands) of the consolidated

Connecticut Sandy Hook cases by the federal district court for **lack of subject matter jurisdiction**, (4) in consolidated First Amendment lawfare cases. The described **red flags** point any reasonable and diligent investigator to the *Lafferty U.S. District Court remand file* [*Lafferty* D. Conn. Case No. 3:18-cv-01156 remand file, Trial Ct. Dckt. 112.00, 11/21/18 (Bankr. Dckt. 1120-1)] which, of course, is both part of and included in the *Lafferty* Connecticut state court case file.

How, in the world, could the United States District Court for the District of Connecticut have ever, possibly, lacked subject matter jurisdiction to rule on the First~Amendment~based, Anti~SLAPP Special Motion to Dismiss that Alex Jones filed with said federal court in the *Lafferty* case on July 20, 2018? (Trial Ct. Dckt. 112.00 at 151~204) There's only one way that could possibly have happened, and that was for Alex Jones to deliberately fail to claim federal question jurisdiction, under 28 U.S.C. § 1331, in his July 13, 2018, Notice of Removal of the *Lafferty* case. And that is exactly what Alex Jones did^{4, 5}, and that is

⁴ See Alex Jones' Notice of Removal in *Lafferty*, U.S. District Court Case No. 3:18-cv-01156, Document 1, Filed 07/13/18. (Trial Ct. Dckt. 106.00 and 112.00 at 11~82)

⁵ See, also, (1) Alex Jones' Notice of Removal in *Sherlach*, U.S. District Court Case No. 3:18-cv-01269, Document 1, Filed 07/31/18 [attached as Exhibit A to Alex Jones' 07/31/18 *Lafferty* state court Notice of Filing Notice of Removal (of the related *Sherlach* case), *Lafferty* Trial Ct. Dckt. 110.00]; and (2) Alex Jones' Motion to Extend Deadline to Respond to Motion to

exactly what the Connecticut Sandy Hook Plaintiffs pointed out on the first page of their successful July 31, 2018, Motion to Remand, specifically, that: “defendants’ only asserted basis for federal jurisdiction is diversity jurisdiction under 28 U.S.C. § 1332.” (Trial Ct. Dckt. 112.00 at 268~293) Diversity of citizenship, as it happens, did **not** even exist on the face of the *Lafferty* Complaint. (Trial Ct. Dckt. 106.00 and 112.00 at 19~61)

The Connecticut defamation actions against Alex Jones should **never**, following **honest** and **proper** (i.e., **non~collusive**) removals to federal court, have been back to the state and local Connecticut court, the worst possible venue for resolution of these highly~charged, highly~controversial, and highly~suspicious defamation cases. The proof is in the pudding; and the pudding here is an outrageous, First Amendment speech~chilling \$1.43 Billion default judgment, boiled~down to a mere \$1.3 Billion by the Connecticut Appellate Court after hearing the “best arguments” Alex Jones had to offer.

Remand (stating both *Lafferty* and *Sherlach* cases removed on asserted basis of diversity, alone). (Trial Ct. Dckt. 112.00 at 319~322)

Significantly, in his own June 2, 2023, Connecticut Appeal Brief⁶, Alex Jones admitted **actual malice**, stating: “Mr. Jones lied about Sandy Hook. He lied to attract attention. That attention drove people to his product pages and sales of those products, presumably, increased.” (Jones’ Appeal Brief at 47) Further, Jones expressly disclaimed First Amendment protections, stating: “Mr. Jones is not contending . . . that his speech was protected on First Amendment grounds.” *Id.* at 50. By admitting **actual malice** on appeal, Alex Jones absolutely ensured the **inapplicability** of First Amendment protections to and for his speech regarding Sandy Hook.

A mere cursory review of Alex Jones’ June 2, 2023, Appeal Brief, i.e., the document Alex Jones filed with the Connecticut Appellate Court to present his best arguments in defense/protection of his statements, his actions, his business(es), and his assets, would show any reasonable person (let alone an attorney or fraud investigator) that there was something **very, very wrong** with Alex Jones’ defense of the consolidated Connecticut Sandy Hook defamation cases. A few more minutes spent reviewing the initial pleadings in the cases reveals unequivocal and inescapable evidence of **collusion**.

⁶ Brief of Defendants Alex Jones and Free Speech Systems, LLC in *Lafferty, et al. v. Alex Emric Jones, et al.*, Connecticut Appellate Court Case No. AC 46131 (filed June 2, 2023).

28 U.S. Code § 1331 states: “The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.” At Paragraphs 40~335 (Pgs. 5~33) of the 39~page *Lafferty* Complaint, Plaintiffs recounted, commented upon, and condemned the content, journalistic reporting, investigative methods, editorial commentary, debate positions, and identity of debaters/ participants of numerous Infowars broadcasts and interviews by Alex Jones concerning the alleged Sandy Hook shooting. All such allegations clearly implicated First Amendment issues concerning freedom of speech and of the press. Further, and significantly, the Connecticut Sandy Hook Plaintiffs **expressly** raised First Amendment issues in asserting: “The plaintiffs bring this action in defense of the values protected by the First Amendment to the U.S. Constitution, not in derogation of it.” (*Lafferty* Complaint Para. 17)

Alex Jones initially and **ostensibly** defended the Connecticut defamation actions as First Amendment cases, removing *Lafferty* to federal court on July 13, 2018 (Trial Ct. Dckt. 106.00), and promptly thereafter, on July 20, 2018, filing a First~Amendment~based Special [Anti~SLAPP] Motion to Dismiss Plaintiffs’ Complaint in the removed action, Case No. 3:18-cv-01156. (Trial Ct. Dckt. 112.00)

In his Petition for Certiorari, Alex Jones has no problem identifying the Connecticut Sandy Hook

defamation suits as First Amendment cases. (Petition for Certiorari at 3 and 4) Indeed, Alex Jones claims he is “**Entitled To All First Amendment Freedom Of The Press Protections**”. *Id.* at 11. [Emphasis as in original.] But Alex Jones didn’t claim federal question jurisdiction under 28 U.S.C. § 1331 ~ for cases arising under the Constitution ~ in his eight (8) page July 13, 2018, Notice of Removal of the *Lafferty* case or in his eight (8) page July 31, 2018, Notice of Removal of the *Sherlach* case. (Trial Ct. Dckt. 106.00, 110.00, and 112.00) This could not possibly have been the result of mistake or malpractice by Jones’ attorneys.

Alex Jones’ obviously and deliberately~ ineffective July 2018 Notices of Removal in the *Lafferty* and *Sherlach* cases constitute **operative evidence of collusion** or self~sabotage by the defense and, thus, of the **fraudulent** nature of the \$1.3 Billion Connecticut state court default judgment giving rise to the instant Petition for Certiorari as a matter of law, meaning that reasonable minds cannot reasonably differ in this regard.

As stated in the undersigned’s February 27, 2025, email to the Chapter 7 Trustee, sent 20 days before the undersigned sought leave to intervene in Alex Jones’ bankruptcy case on March 19, 2025:

This is not a complicated case, **Trustee Murray**. **Alex Jones** and his **Randazza** law firm attorney, **Jay Wolman**, a graduate of **Cornell** and **Georgetown Law**, and a 25~year, **AV-Preeminent** rated lawyer, did **not** simply

forget, twice, in removing the Lafferty and Sherlach cases to federal court in July 2018, **to claim federal question jurisdiction** under **28 U.S.C. Section 1331** to ensure the **U.S. District Court for the District of Connecticut** would have **subject matter jurisdiction** to consider and rule upon the merits of the **1st Amendment~based Special** [Anti~SLAPP] **Motion to Dismiss** they also filed with the federal court in July 2018. (Please see the attached 13~Slide **PwrPnt for Jones BR Trustee.**)

This was a setup, and **Alex Jones** and his **Randazza** attorneys took an immediate and purposeful dive on the defense of the Connecticut Sandy Hook defamation cases. Based merely upon **Alex Jones'** federal court filings in July 2018 alone, there is **more than probable cause** for reasonable minds to conclude that the **\$1.3 Billion Connecticut state court judgment** giving rise to the instant **Chapter 7** bankruptcy of **Alex Jones** was fraudulently~obtained.

(Bankr. Dckt. 1120-11) [Emphasis as in original.]

Alex Jones' filing of a deliberately~ineffective Notice of Removal in *Lafferty* on July 13, 2018, followed promptly by his July 20, 2018, filing of a potentially~dispositive First~Amendment~based, Anti~SLAPP Special Motion to Dismiss (which Jones

effectively ensured would not be worth the paper it was written on) (Trial Ct. Dckt. 112.00 at 11~82 and 151~204) was a cynical and sophomoric sleight of hand to abuse and undermine not only federal judicial process, but also the Constitution, itself, which both establishes the federal judiciary and enumerates our Bill of Rights. Jones colluded with the Connecticut Families to make **a show of a fight** in federal court, wasting the valuable time and limited resources of and **committing a fraud on the Connecticut U.S. District Court**, and generating a **false impression** among the public, via Jones' filed, but terminated Special Motion to Dismiss, that well~established First Amendment jurisprudence, e.g., *N.Y. Times Co. v. Sullivan*, 376 U.S. 254 (1964), is no longer valid or has been reversed. (Trial Ct. Dckt. 112.00 at 151~204 and 385~398)

Even if Alex Jones is afforded plausible deniability for his sanctionable conduct occurring after the remand of *Lafferty* back to state court in November 2018 and resulting in (1) disallowance of his refiled and unanswered Anti~SLAPP Special Motion to Dismiss (Trial Ct. Dckt. 113.00, 114.00, and 269.00) and (2) the granting of a default judgment on liability (Trial Ct. Dckt. 574.00), there is **no plausible deniability** for Alex Jones' failure to claim federal question jurisdiction for First Amendment lawfare cases he removed to federal court and thereafter defended as such in **a show of a fight**. Such conduct provides operative, inescapable, and conclusive evidence of **collusive fraud**.

2. The Petition for Certiorari should be denied, and Case No. 25A-268 should be dismissed and vacated from the docket as a fraud on the Court.

“Collusion” is both defined as and occurs “when **two or more** parties secretly agree to **defraud** a third-party of their rights or accomplish an illegal purpose.”⁷ As emphasized, it takes two or more parties to collude, and Alex Jones didn’t throw the defense of the *Lafferty* case with his very first responsive pleading⁸ for no reason. In this case, Alex Jones and the Connecticut Sandy Hook Plaintiffs colluded to **defraud** the American people of their constitutional rights.

The practical goals of the parties’ collusion may and should be assessed in light of the practical effects foreseeably generated thereby: (1) a false public impression that *Sullivan, supra*, has been reversed and that public figure defamation plaintiffs no longer need to prove actual malice to recover; (2) a massive chilling of freedom of speech and of the press, especially with respect to controversial issues, and for fear of massive defamation liability; (3) a corruption of the integrity of the federal judicial system, which the

⁷ *Legal Encyclopedia*, Legal Information Institute, Cornell Law School, <https://www.law.cornell.edu/wex/collusion>. [Emphasis added.]

⁸ i.e., Jones’ deliberately~ineffective Notice of Removal of *Lafferty* (Case No. 3:18-cv-01156 Dckt. 1; see, also, Trial Ct. Dckt. 106.00).

colluding parties have misused and abused, on multiple levels, in order to perpetrate their **treasonous fraud**; and (4) an overall undermining of the First and Second Amendments, the core and foundational rights of the American Republic.

The parties' fraudulent use/abuse of the federal judicial system began in the Connecticut proceedings, has continued (between the same parties/litigants) through the course of Jones' Chapter 7 bankruptcy case, and is now brought to and imposed upon the Supreme Court of the United States.

Extrinsic fraud, i.e., fraud not disclosed/litigated in a given matter, "vitiates **every thing**" and is a proper equitable basis to set aside judgments. *United States v. Throckmorton*, 98 U.S. 61, 66 (1878). [Emphasis added.] In *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944)⁹, a case involving remarkably similar facts, this Court revisited *Throckmorton*, *supra*, and expanded the scope of judgments that may be set aside on equitable grounds due to **fraud on the court**. The *Hazel-Atlas* Court, finding "a deliberately planned and carefully executed scheme to defraud not only the Patent Office, but the Circuit Court of Appeals", 322 U.S. at 245, stated:

This matter does not concern only private parties. There are issues of great moment to the

⁹ Overruled on other, process/procedural grounds in *Standard Oil Co. of California v. United States*, 429 U.S. 17 (1976).

public in a patent suit. [*Citations omitted.*] Furthermore, tampering with the administration of justice in the manner **indisputably shown** here involves far more than an injury to a single litigant. It is **a wrong against the institutions** set up to protect and safeguard the public, institutions in which fraud cannot complacently be tolerated consistently with the good order of society. Surely it cannot be that preservation of the integrity of the judicial process must always wait upon the diligence of litigants. The public welfare demands that the agencies of public justice be not so impotent that they must always be mute and helpless victims of **deception and fraud.**

* * *

Equitable relief against fraudulent judgments is not of statutory creation. It is a judicially devised remedy fashioned to relieve hardships which, from time to time, arise from a hard and fast adherence to another court-made rule, the general rule that judgments should not be disturbed after the term of their entry has expired. Created to avert the evils of archaic rigidity, this equitable procedure has always been characterized by flexibility which enables it to meet new **situations which demand equitable intervention,** and to accord all the

relief necessary **to correct the particular injustices** involved in these situations.

322 U.S. at 246 and 248. [Emphasis added.]

Under *Throckmorton* and *Hazel-Atlas*, **the fraud on the courts**, which originated in the Connecticut proceedings, which has continued between the same parties through the course of Alex Jones' bankruptcy, and which is now being visited upon the Supreme Court of the United States, **vitiates every thing**.

The issue of fraud or collusion was never raised or litigated in the consolidated Connecticut defamation actions for the simple reason that the parties to said cases were and are acting in collusion. Based on Alex Jones' consistent pattern of self-sabotage throughout the course of the consolidated Connecticut defamation actions, it is reasonable to conclude that he is now acting on behalf of the colluding parties to secure a denial of certiorari so that, legally speaking, the \$1.3 Billion Connecticut state court default judgment will be etched in stone and, on a practical level, the spectre of the monstrous, free-speech-chilling judgment will be etched in the hearts and minds of the people and the press. This will serve the purpose of undermining the constitutional rights the colluding parties have been targeting all along.

The “**Alex Jones Sandy Hook Case**” (as the consolidated Connecticut defamation actions are known), with its headline~grabbing \$1.43 Billion (now \$1.3 Billion) adverse default judgment against a well~known public figure/purported journalist, has developed to become one of the most infamous legal proceedings in the history of our republic, receiving massive media attention both domestically and abroad. To date, the **chilling effects** on freedom of speech and of the press of a \$1.3 Billion adverse default judgment against a well~known public figure/purported journalist have been impossible to avoid, but difficult to calculate.

If the Supreme Court of the United States renders any decision in this, the “**Alex Jones Sandy Hook Case**”, without awareness and consideration of the unequivocal and operative evidence of **collusive fraud** contained in the *Lafferty* U.S. District Court remand file for Case No. 3:18-cv-01156 (Trial Ct. Dckt. 112.00), then the damage done to our core and foundational constitutional rights by this **treason** will no longer be difficult to calculate; the damage wrought will be **incalculable**.

Ironically, in his Petition for Certiorari, Alex Jones complains sixty~four (64) times of a “Death Penalty Sanction” (i.e., liability by default) imposed by the trial court in *Lafferty*. In view of the collusive and **treasonous** fraud *Lafferty* represents, a ”Death Penalty Sanction” for Case No. 25-268 is entirely appropriate and undoubtedly warranted. Accordingly,

Case No. 25-268 should be dismissed and vacated from the docket as a fraud on the Court.

CONCLUSION

For the foregoing reasons, the undersigned *amicus curiae* respectfully submits that the instant Petition for Certiorari should be denied, and Case No. 25A-268 should be dismissed and vacated from the docket as a fraud on the Court.

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Respectfully submitted,

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