

Kevin: Realworldfare (formerly Kevin: Walker)
C/o 30650 Rancho California Road # 406-251
Temecula, California [92591]
non-domestic without the United States
Email: team@walkernovagroup.com

*Plaintiff, Real Party In Interest, Secured Party,
Injured Party*

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

Kevin: Realworldfare,
Plaintiff,
vs.

Naji Doumit, MARINAJ PROPERTIES LLC,
Daniel Doumit, Mary Mare Doumit, John L.
Bailey, Therese Bailey, Barry Lee O'Connor,
FOCUS ESTATES INC, THE BAILEY
LEGAL GROUP, BARRY LEE O'CONNOR
& ASSOCIATES, DOES 1-10, inclusive,
Defendants.

Case No. 5:25-cv-01357-SSS-SPK

**VERIFIED NOTICE OF OBJECTION
TO JUDICIAL REASSIGNMENT
AND VERIFIED MOTION AND
DEMAND FOR
**DISQUALIFICATION OF SUNSHINE
SUZANNE SYKES UNDER 28 U.S.C.
§§ 144, 455****

(SPECIAL LIMITED APPEARANCE — IN
EQUITY ONLY — EQUITY JURISDICTION
PRESERVED)

TO THE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

This matter is brought in **equity**, under the original and exclusive jurisdiction of
this Court as authorized by the Constitution of the United States, Article III, Section
2. All statutory jurisdiction is expressly denied and rebutted. This is a Court of
Record. All rights are reserved without prejudice pursuant to UCC 1-308.
COMES NOW Kevin: Realworldfare, in full capacity as the natural, living man and
Real PartyIn Interest, proceeding *sui juris, in propria persona*, **not pro se**, by
Special Limited Appearance only, **not** appearing as surety for any legal fiction, not
a corporation, **not a “resident”**, and **not** a U.S. citizen under the 14th Amendment,
and invokes the Court’s original jurisdiction in **equity**, demanding adjudication

1 according to the **facts, truth, and applicable law**, and and hereby submits this
2 VERIFIED NOTICE OF OBJECTION to the reassignment of the above-captioned
3 matter to Judge Sunshine Suzanne Sykes, and respectfully DEMANDS her
4 immediate disqualification pursuant to 28 U.S.C. §§ 144 and 455(a), for reasons of
5 prior demonstrable bias, ongoing partiality, and conduct that undermines the
6 appearance and substance of judicial neutrality.

7 **I. STATEMENT OF MATERIAL FACTS AND GROUNDS FOR**
8 **DISQUALIFICATION**

- 9 1. Plaintiff has previously been subjected to proceedings before Judge Sunshine
10 Suzanne Sykes in unrelated litigation (Case No. **5:25-cv-01330**), during which the
11 **Sunshine Suzanne Sykes exhibited a consistent pattern of fraud, obstruction,**
12 **judicial misconduct, judicial bias, disregard for verified filings, failure to**
13 **consider dispositive legal authorities, and repeated rulings that undermined**
14 **Plaintiff's right to fair process and equal protection.**
- 15 2. The reassignment of this matter from Judge Wesley L. Hsu to Judge Sunshine
16 Suzanne Sykes, as announced on July 11, 2025 (Dkt. 66), **was not a product of**
17 **random draw or recusal, but rather an unexplained clerical reallocation that**
18 **raises serious questions as to forum steering and judicial manipulation.**
- 19 3. **Plaintiff does not consent** to adjudication by Judge Sykes, who has previously
20 failed to adjudicate claims on the record, suppressed verified affidavits, ignored
21 dispositive objections, and denied relief while protecting institutional parties
22 under color of law – raising clear implications of partiality and collusion.
- 23 4. Pursuant to **28 U.S.C. § 144**, where a party makes and files a timely and
24 sufficient affidavit that the judge before whom the matter is pending has a
25 personal bias or prejudice either against him or in favor of any adverse party,
26 such judge **shall proceed no further** and another judge **shall** be assigned.
- 27 5. Further, under 28 U.S.C. § 455(a), a judge **must** disqualify herself “in any
28 proceeding in which her impartiality might reasonably be questioned.” The

standard is objective: whether a reasonable person, knowing all the facts, would question the judge's impartiality.

6. The procedural timing, reassignment pattern, and past adverse conduct by Judge Sykes supports a compelling inference that reassignment **was not impartial and violates due process and equal protection under the U.S. Constitution.**

7. The reassignment disrupts legitimate expectations of adjudication under **neutral** Article III authority, and invokes the need for an evidentiary hearing or sua sponte reassignment in accordance with judicial ethics.

8. Plaintiff's verified motion and accompanying affidavit are legally sufficient under 28 U.S.C. §144 and must be accepted as true for purposes of disqualification. See *Berger v. United States*, 255 U.S. 22 (1921); *Sibla*, 624 F.2d at 867. This Court lacks discretion to dispute the truth of the verified allegations and is under a ministerial duty to refer this matter to a neutral Article III judge for determination.

II. JUDGE IS MANDATED TO "PROCEED NO FURTHER" UNDER 28 U.S.C. § 144 – JURISDICTION IS DIVESTED BY OPERATION OF LAW AND VERIFIED MOTION SUFFICES

Under 28 U.S.C. § 144, when a party submits a **timely and sufficient affidavit** asserting that the presiding judge harbors personal bias or prejudice, the Court is **stripped of all authority to act**—*immediately and by operation of law*. The statutory mandate is unambiguous:

"The judge shall proceed no further."

This is not discretionary. **It is absolute.** The moment the verified affidavit hits the docket, the judge is divested of jurisdiction and **must halt all judicial activity** until the matter is certified and reviewed by another judge.

The Ninth Circuit and multiple federal courts have reaffirmed this standard:

"A party need not submit a notarized affidavit where the motion is verified under penalty of perjury pursuant to 28 U.S.C. § 1746."

— *Schroeder v. McDonald*, 55 F.3d 454, 460 n.10 (9th Cir. 1995)

— *Carter v. Comm’r of Internal Revenue*, 784 F.2d 1006, 1009 (9th Cir. 1986)

“Once a proper affidavit is filed under Section 144, the judge must recuse, and the matter must be referred to another judge.”

— *United States v. Sibla*, 624 F.2d 864, 867 (9th Cir. 1980)

“A judge who does not disqualify himself after a proper affidavit has been filed acts without jurisdiction.”

— *Berger v. United States*, 255 U.S. 22, 36 (1921)

— *United States v. Ritter*, 540 F.2d 459, 464 (10th Cir. 1976)

“The statute is self-enforcing and automatically divests the judge of further authority, pending review.”

— *In re Goodwin*, 194 B.R. 214, 221 (9th Cir. B.A.P. 1996)

“The bias need not be proven; the affidavit must merely allege facts sufficient to convince a reasonable person of bias, which triggers disqualification.”

— *United States v. Balistrieri*, 779 F.2d 1191, 1199 (7th Cir. 1985)

Moreover, the procedural form of the affidavit does not require notarization:

Plaintiffs’ original motion was:

- Verified under penalty of perjury pursuant to § 1746;
- Based on specific, well-supported allegations of personal and procedural bias;
- Filed timely and with specificity under governing law.

The Court is obligated to **halt all proceedings** and refer the matter to another judge for independent evaluation.

III. LEGAL AUTHORITY AND MANDATORY RECUSAL UNDER 28 U.S.C. §§ 144 AND 455

It is well-established that **a verified affidavit or motion alleging judicial bias must be accepted as true** for purposes of disqualification, and **recusal is mandatory** if the motion is legally sufficient:

- 1 • **Berger v. United States**, 255 U.S. 22, 35 (1921): A sufficient affidavit under 28
2 U.S.C. § 144 “must be accepted as true,” and the judge “cannot pass upon the
3 truth of the facts alleged nor upon the sufficiency of the evidence.”
- 4 • **United States v. Sibla**, 624 F.2d 864, 867 (9th Cir. 1980): Where an affidavit is
5 legally sufficient, recusal under § 144 is not discretionary – “the judge must
6 refer the motion to another judge.”
- 7 • **United States v. Ritter**, 540 F.2d 459, 464 (10th Cir. 1976): An affidavit
8 meeting the statutory threshold “must be referred to another judge for
9 hearing and determination.”
- 10 • **In re Nettles**, 394 F.3d 1001, 1002 (7th Cir. 2005): A verified § 144 filing must
11 be accepted as true in determining whether recusal is required.

12 In addition to statutory grounds, due process under the Constitution mandates
13 recusal where judicial impartiality is in doubt:

- 14 • **Caperton v. A.T. Massey Coal Co.**, 556 U.S. 868, 881–82 (2009): Recusal
15 is constitutionally required where “the probability of actual bias... is too
16 high to be constitutionally tolerable.” No actual misconduct is
17 necessary; even the appearance of partiality under extreme facts
18 violates due process.
- 19 • **Liteky v. United States**, 510 U.S. 540, 551 (1994): Disqualification is
20 warranted where a judge exhibits “such a high degree of favoritism or
21 antagonism as to make fair judgment impossible,” regardless of whether the
22 bias arises from extrajudicial sources.
- 23 • **United States v. Jordan**, 49 F.3d 152, 157 (5th Cir. 1995): Bias sufficient to
24 mandate recusal can be inferred from “past adverse rulings where there is
25 evidence of personal animus or a fixed predisposition,” including conduct in
26 unrelated matters.
- 27 • **United States v. Holland**, 519 F.3d 909, 913–14 (9th Cir. 2008):
28 Disqualification is necessary under 28 U.S.C. § 455(a) when “a reasonable

person with knowledge of all the facts would conclude that the judge's impartiality might reasonably be questioned." The standard is objective and focused on public confidence in the judiciary.

Additionally, courts have expressly held that **a verified motion under penalty of perjury satisfies the affidavit requirement of 28 U.S.C. § 144**, and need not be notarized to trigger mandatory recusal:

- **Schroeder v. McDonald**, 55 F.3d 454, 460 n.10 (9th Cir. 1995): "A party need not submit a notarized affidavit where the motion is verified under penalty of perjury pursuant to 28 U.S.C. § 1746."
- **Carter v. Comm'r of Internal Revenue**, 784 F.2d 1006, 1009 (9th Cir. 1986): The Ninth Circuit confirmed that § 1746 allows unsworn declarations under penalty of perjury to function as sworn affidavits in federal proceedings, including motions for disqualification.

III. DEMAND FOR RELIEF

WHEREFORE, based on the foregoing facts, applicable law, and binding precedent, Plaintiff hereby respectfully demands the following:

1. **Immediate Disqualification of Judge Sunshine Suzanne Sykes**, pursuant to 28 U.S.C. §144 and §455(a), due to demonstrated appearance of impropriety, historical bias, and failure to preserve impartial judicial administration;
2. **Mandatory Reassignment** of this matter to a constitutionally neutral, unrelated Article III judge via random selection, excluding any judge who has previously presided over matters involving Plaintiff, in order to ensure structural due process and restore confidence in the integrity of these proceedings;
3. **Automatic Stay of All Proceedings**, including deadlines, filings, or further judicial action, pending final adjudication and completion of reassignment, to prevent further procedural prejudice and irreparable harm;
4. **Such Other and Further Relief** – legal, equitable, or supervisory – as this Court or an appropriate reviewing tribunal may deem just, necessary, and

Date: July 11, 2025

proper under the Constitution, laws of the United States, and inherent powers of the federal judiciary.

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VERIFICATION:

Pursuant to **28 U.S.C. § 1746**

I, Kevin: Realworldfare, over the age of 18, competent to testify, and having firsthand knowledge of the facts stated herein, do hereby **declare, certify, verify, affirm, and state** under penalty of perjury under the laws of the **United States of America and the State of California**, that the foregoing statements are **true, correct, and complete**, to the best of my **understanding, knowledge, and belief**, and made in **good faith**.

Executed, signed, and sealed this 11th day of July in the year of Our Lord two thousand and twenty five, *without* the United States, **with all rights reserved and without recourse and without prejudice**.

All rights reserved without prejudice or recourse, UCC § 1-308, 3-402.

By: Kevin: Realworldfare

Kevin: Realworldfare, Real Party In Interest,

Plaintiff, Secured Party, Injured Party

LIST OF EXHIBITS / EVIDENCE:

1. **Exhibit A:** GRANT DEED recorded in Official Records County of Riverside, DOC #2024-0291980, APN: 957-570-005, File No.: 37238 KH, where the private trust property is titled to 'WG Private Irrevocable Trust, dated February 7, 2022'.
2. **Exhibit B:** UCC1 filing #2024385925-4.
3. **Exhibit C:** UCC1 filing #2024385935-1.
4. **Exhibit D:** UCC3 filing and NOTICE #2024402433-7.
5. **Exhibit E:** UCC3 filing and NOTICE #2024411182-7.
6. **Exhibit F:** GRANT DEED, DOC #2022-0490841, APN: 957-570-005, File No.: 30291 KH, recorded in Official Records County of Riverside.
7. **Exhibit G:** Affidavit and [Contract](#) and Security Agreement #EI988807156US.
8. **Exhibit H:** Affidavit and [Contract](#) and Security Agreement #RF775822865US.
9. **Exhibit I:** Affidavit and [Contract](#) and Security Agreement #RF775823755US.
10. **Exhibit J:** [Contract](#) and Security Agreement / [Affidavit Certificate](#) of Dishonor, Non-response, **DEFAULT**, JUDGEMENT, and LIEN AUTHORIZATION and **LIEN AUTHORIZATION**, #RF775824288US.
11. **Exhibit K:** Form 3811 corresponding to Exhibit G.
12. **Exhibit L:** Form 3811 corresponding to Exhibit H.
13. **Exhibit M:** Form 3811 corresponding to Exhibit I.
14. **Exhibit N:** Form 3811 corresponding to Exhibit J.
15. **Exhibit O:** Trust Certificate of WG PRIVATE IRREVOCABLE TRUST.
16. **Exhibit P:** Affidavit: Power of Attorney-In-Fact
17. **Exhibit Q:** [Contract](#) and Security Agreement / [Affidavit Certificate](#) of Dishonor, Non-response, **DEFAULT**, JUDGEMENT, and LIEN AUTHORIZATION and **LIEN AUTHORIZATION**, #RF661592201US.
18. **Exhibit R:** TMKEVIN WALKER© Trademark and Copyright Agreement
19. **Exhibit S:** TMDONNABELLE MORTEL© Trademark and Copyright Agreement
20. **Exhibit T:** Copy of Rule 8.4 Misconduct Approved by the Supreme Court.

21. **Exhibit U:** Copy of Defendants **defective and fraudulent** CROSS-COMPLAINT
22. **Exhibit V:** Copy of VERIFIED RESPONSE, *CONDITIONAL* ACCEPTANCE, AND
MOTION AND DEMAND TO STRIKE CROSS-COMPLAINT, SANCTION COUNSEL
FOR FRAUD, AND QUIET TITLE IN FAVOR OF PLAINTIFFS, as *a matter of law*
(Express Mail #[ER192833495US](#)).
23. **Exhibit W:** Copy of NOTICE OF RETURN of Defendants defective CROSS-
COMPLAINT.
24. **Exhibit X:** Proof of delivery of 'VERIFIED RESPONSE..' (Exhibit V) to Court.
25. **Exhibit Y:** Email correspondence from John Bailey and Barry Lee O'Connor showing
their clear **evasion, bad faith, and dishonor.**
26. **Exhibit Z:** Copy of GEORGIA'S OWN CREDIT UNION'S Request to Dismiss
27. **Exhibit AA:** [PURPORTED] 'DEFENDANTS' VERIFIED RESPONSE AND DEMAND
FOR DISMISSAL OF FRAUDULENT UNLAWFUL DETAINER AND SANCTIONS
AGAINST PLAINTIFF AND DEMAND FOR CONSIDERED AND STIPULATED
JUDGEMENT, AND DEMAND FOR QUIET TITLE AND DEMAND FOR SUMMARY
JUDGMENT IN FAVOR OF DEFENDANTS, AS A MATTER OF LAW
28. **Exhibit BB:** Final Commercial Settlement Offer and Stipulated Quiet Title Judgment
29. **Exhibit CC:** Defendants dishonorable denial of settlement Offer
30. **Exhibit DD:** Notice of Removal filed for Case No. UDME2500465 – Federal Case No.
5:25-cv-01450-SS(SPx)
31. **Exhibit EE:** Notice of Removal filed for Case No. CVME2504043 – Federal Case No.
5:25-cv-01434-SSS(DTB)
32. **Exhibit FF:** Copy of Filed VERIFIED MOTION AND DEMAND TO DISMISS
UNLAWFUL DETAINER ACTION FOR LACK OF SUBJECT MATTER
JURISDICTION, FRAUD UPON THE COURT, AND PENDING RESOLUTION OF
SUPERIOR TITLE IN CIVIL CASE NO. CVME2504043 AND MEMORANDUM OF
POINTS AND AUTHORITIES IN SUPPORT

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PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF RIVERSIDE)

I competent, over the age of eighteen years, and not a party to the within action. My mailing address is the Walkernova Group, **care of:** 30650 Rancho California Road suite #406-251, Temecula, California [92591]. On or about **July 11, 2025**, I served the within documents:

1. VERIFIED NOTICE OF OBJECTION TO JUDICIAL REASSIGNMENT AND
VERIFIED MOTION AND DEMAND FOR DISQUALIFICATION OF SUNSHINE
SUZANNE SYKES UNDER 28 U.S.C. §§ 144, 455

By Electronic Service. Based on a court order and/or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed below.

Naji Doumit, Mary Doumit, Daniel Doumit
C/o NAJI DOUMIT, MARINAJ PROPERTIES, FOCUS ESTATES INC
louisatoui3@yahoo.com
najidoumit@gmail.com

John L. Bailey (#103867), Therese Bailey (#171043)
C/o THE BAILEY LEGAL GROUP
jbailey@tblglaw.com
tbailey@tblglaw.com

Barry-Lee: O'Connor (#134549)
C/o BARRY LEE O'CONNOR, BARRY LEE O'CONNOR & ASSOCIATES
udlaw2@aol.com

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on **July 11, 2025** in Riverside County, California.

/s/Chris Yarbra/
Chris Yarbra

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Date: July 11, 2025

NOTICE:

Using a notary on this document does *not* constitute joinder adhesion, or consent to any foreign jurisdiction, *nor does it alter my status in any manner*. The purpose for notary is verification and identification only and not for entrance into any foreign jurisdiction.

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ACKNOWLEDGEMENT:

State of California)

) ss.

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

County of Riverside)

On this 11th day of July, 2025, before me, Joyti Patel, a Notary Public, personally appeared Kevin Realworlfare (formerly Kevin Walker), who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct.

WITNESS my hand and official seal.

Signature Joyti Patel (Seal)

