

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

Case No:

WILLIAM G. KOTEL,

8:23 cv 954 TPB-AAS

Plaintiff,

v.

PR^SIDENT OF THE UNITED STATES, JOEPH BIDEN,
AND THE EXECUTIVE BRANCH OF GOVERNMENT

RESPONDENTS

PETITION FOR A WRIT OF MANDAMUS

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TPA-68 470
\$402.00

Now comes William G. Kotel, the petitioner, retired US Army Intelligence who files this Emergency Petition for a Writ of Mandamus pursuant to 28 U.S.C., Presidents Oath of Office, Article II of the constitution, Article 4 section IV of the Constitution.

This matter is unclassified and all information has been derived from open source, and involves the following actions taken by the unlawful criminal action of Nicolas Maduro, Venezuela, from 2017 to present day:

1. In 2017 the use of death squads to kill his own people and move their bodies to disposal sites in an attempt to hide evidence from any oversight agencies, and maintain power illegally as ruler of Venezuela.

(<https://www.hrw.org/news/2019/09/18/venezuela-extrajudicial-killings-poor-areas> EXHIBIT A)

2. In 2017 \$15 million dollar bounty on Nicolas Maduro from the United States in response to his crimes against humanity

(<https://news.bitcoin.com/15-million-bounty-maduro-drug-trafficking/> EXHIBIT B)

3. Juan Guido was lawfully elected in 2018 and supported by the United States, but to present day he has not been able to remove Nicolas Maduro. In March of 2022 the United States Department of State (DOS) did send personnel to negotiate with Maduro unlawfully. Petitioner did an Inspector General Compliant (IG) on the date of the meeting resulting in an apology from DOS, but they still deal with Maduro.

(<https://www.washingtonpost.com/world/2022/03/06/venezuela-american-officials-visit/> EXHIBIT C)

4. Maduro is hosting Russian, Chinese, and Iranian military in Venezuela. These are clear adversaries of the United States, and further Maduro gave Russia 70% of the gold bullion backing the currency in Venezuela to bribe support. (<https://www.lapatilla.com/2022/01/24/examining-russian-and-chinese-military-operations-in-venezuela/>;

<https://winepressnews.com/2022/07/14/russia-china-and-iran-to-run-joint-military-drills-in-venezuela-in-august/> EXHIBIT D)

5. Maduro is part of and sponsoring drug cartels. In particular the Cartel of the Sun's. Cartel's are now pushing human trafficking and drug trafficking through south and central America to the United States. These cartel's are getting endorsed and supported by Maduro.

(<https://insightcrime.org/investigations/drug-trafficking-venezuelan-regime-cartel-of-the-sun/> EXIBIT E)

6. Maduro is supporting, giving safe harbor too, and sponsoring multiple terrorist groups in Venezuela. These groups are against the United States and our allies operating in our hemisphere.

(<https://ge.usembassy.gov/maduro-welcomes-terrorist-groups-to-venezuela-says-report/>; <https://ge.usembassy.gov/maduro-welcomes-terrorist-groups-to-venezuela-says-report/> EXIBIT F)

7. Maduro has held 9 Americans as hostages for years.

(<https://www.nbcnews.com/news/us-news/venezuela-releases-7-jailed-americans-us-frees-2-prisoners-rcna50329> EXIBIT G)

8. Maduro may be supporting a weapons of mass destruction program with the aid of United States adversaries. It is critical to confirm or deny this threat, and news from open source has been pulled on this subject.

(<https://www.globalsecurity.org/wmd/world/venezuela/index.html> EXIBIT H)

9. Maduro threatens United States after Russian invaded Ukraine 22 Feb 2022. Maduro offered to attack the United States with military force to aid the Russians. (<https://www.hnqn.com/articles/241293/20220326/us-venezuela-nicolas-maduro-enters-military-pact-russia-disregards-joe-biden-desperate-attempt-isolate.htm> EXIBIT I)

10. Maduro has caused the south and central American human trafficking crisis as Venezuela has now 7.1 million refugees, as per United Nations calculations. This is the United States current immigration crisis at our southern borders, and Title 42 applies to the Venezuelans. Further many other countries in south and central America are pushing these immigrants north due to the enormous strain on their own countries. (

<https://www.unhcr.org/refugee-statistics/> EXIBIT J)

11. Maduro's actions have emboldened other countries to operate more against the United States. Examples are Cuba emboldened, Nicaragua has arrested 222 Catholics including a Bishop and sentenced them to 26 years in jail. The linkage is directly related to Maduro's actions.

(<https://abcnews.go.com/International/wireStory/nicaragua-prisoner-release-pressure-valve-ortega-regime-97040449> EXIBIT K)

12. In the past this President and staff did in fact cause the deaths of 13 American Service members, lost an enormous amount of military material, equipment, and lost accountability of US civilians in a hostile country (Afghanistan). This action to adhere to an unlawful timeline created the problem, and also allowed for American interests to be compromised. This shows patterns of misconduct and this administration does not comply and do their duties by allowing Maduro to operate after all he has done. (see previous mandamus EXIBIT L)

13. Venezuela is the leading producer of oil in the American hemisphere, and much of the oil is going to China (an adversary of the United States) as well as being used as a bargaining chip to deal unlawfully with this current administration. Deals for oil "DO NOT NEGATE" human rights violations or criminal conduct. Further deals don't negate the responsibilities to protect and defend the United States. (<https://www.atlanticcouncil.org/blogs/new-atlanticist/us-eases-oil-sanctions-venezuela-chevron-maduro/> EXIBIT M)

Petitioner's plea:

Petitioner prays the court hears the following matters. If the information was available prior to 911 we could have averted the tragedy that befell the United States 22 years ago. As of this date the facts are the following:

1. Over 100 terrorists have been caught at the US border (ISIS, Hezbollah, and more) 50 U.S. Code § 21 - Restraint, regulation, and removal – Invasion, 18 U.S. Code § 1505. Obstruction of proceedings before departments, agencies, and committees
2. China has increased spying activity and secret police action on US soil.
3. Maduro has made open threats against the United States and conspired with Russia, China, Iran.
4. Cartel's have freedom of movement causing increase in drugs and human trafficking.

The ability to prevent any further harm to the United States and stop any mass casualty event is the duty of the executive branch.

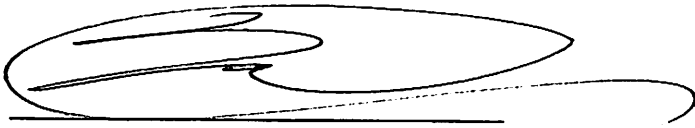
Petitioner's remedy:

Petitioner prays the court to intervene grant the Writ of Mandamus ordering the President to conduct a police action to effect an arrest of the criminal Nicolas Maduro and his criminal personnel assisting in the crimes listed above. The crimes have caused and are causing national security issues with the United States, and allowing for criminal conduct throughout the American hemisphere. These crimes and other will be stopped by conducting the police action.

Petitioner's right to file in "United States District Court"

1. A dispute that involves a right in the United States Constitution
2. A dispute that involves the United States of America (or any of its agencies, officers, or employees in their official capacities)

Respectfully Submitted



William G. Kotel, RET, USA

Please send notices to:
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Sworn to me this 27th day of April, 2023, known to me by

Nina Holmes.

NINA G. HOLMES



NOTARY PUBLIC

My commission 13 March 2027