

ISSUES PRESENTED FOR REVIEW

1. **As evidenced from the course of the proceedings before Judge Holeman, was appellant entitled to his disqualification for pervasive actual bias meeting the “impossibility of fair judgment” standard articulated by the U.S. Supreme Court in *Liteky v. United States*, 510 U.S. 540?***
 - A. Were appellant’s February 23 and March 22, 2004 pretrial motions to disqualify Judge Holeman sufficient, as a matter of law, to require his disqualification for pervasive actual bias, divesting him of jurisdiction to “proceed...further”, pursuant to D.C. Superior Court Civil Procedure Rule 63-I – and was there any basis in fact and law for Judge Holeman’s conduct and rulings challenged therein?
 - B. Were Judge Holeman’s subsequent pretrial, trial, and post-trial rulings further confirmatory of his pervasive actual bias – and were they factually and legally supported?

2. **Whether D.C. Code §10-503.18 entitled appellant to removal/transfer of this “disruption of Congress” case to the U.S. District Court for the District of Columbia where, additionally, the record establishes a pervasive pattern of egregious violations of her fundamental due process rights and “protectionism” of the government?**

3. **Is the “disruption of Congress” statute, D.C. Code §10-503.16(b)(4), unconstitutional, *as written and as applied*?**

4. **Whether, when Judge Holeman suspended execution of the 92-day jail sentence he imposed upon appellant, his terms of probation were appropriate and constitutional and whether, when appellant exercised her right to decline those terms, pursuant to D.C. Code §16-760, it was legal and constitutional for him to double the 92-day jail sentence to six months?**

* Encompassed in this issue is whether Judge Holeman’s rulings, individually and collectively, were so egregiously “erroneous” and prejudicial as to require reversal.