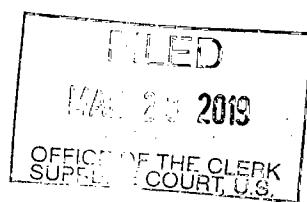


IN THE SUPREME COURT OF THE UNITED STATES

APPLICATION FOR REHEARING AND EN BANC REHEARING

Akash Dixit Vs. Christopher Brasher, Judge Case number 18-7213



**GROUND FOR PETITION OF REHEARING (A HEART RENDING CRY OF 25
MILLION US CHILDREN INCLUDING THAT OF MY SON)**

According to the rule 44.2 of this court: *"[The grounds for petition of rehearing] shall be limited to intervening circumstances of a substantial or controlling effect or to other substantial grounds not previously presented."* Following grounds conform to the requirement:

Do the US courts (state or federal) have jurisdiction over divorces between two foreigners, who were residing in their own country and had no bona fide status to be present in the US at the time of filing of the divorces or, in other words, do the US courts have jurisdiction over divorces between every married couple across the globe?

OR IN THE ALTERNATIVE

What the FUCK¹ (after 3.5 years of fighting for the life of my son, my patience has expired; please see the foot note) do I need to do to be with my son, in this country

¹ For last over 3.5 years, I have been fighting for the life of my son. I have been politely asking the judges of this country to follow their own laws. Please see the appellant's brief attached as Exhibit 1 and certiorari 18-5197. Both the filings are a testimony on how with immense efforts, I have tried to present my point of view in a legally admissible way. Anybody knowing even the most basic aspects of law will tell you that courts should operate within the jurisdiction. In the words of the Supreme court, acting outside of jurisdiction is "lawless violence" or "treason to the constitution." It is the basics of law that courts should vacate void judgments (due process clause of the constitution) and that the nations should not kidnap foreign citizen children (22 USC 9001 through 9011)). But these idiots do not listen to polite utterances. In a synopsis, my case is that of fraudulent immigration by Tanya Singh Dixit, Karan Singh of Barclays bank, divorce attorney Gregory Golden in Atlanta and fulton county superior court judge, Christopher Brasher. Please read the background section for details. However, rather than punishing the culprits, the US judiciary is punishing the innocents, me and my minor son. There is a limit of torture that a father can tolerate towards his son. Unnecessarily, I and my son are being victimized and persecuted for absolutely no crime. I have lived in this country for over 16 years and do not even have a driving ticket to my discredit, still I was brutally sequestered from the life of my son and am incarcerated for last over 7 months without **due process or probable cause**. I just want to return to our country of citizenship with my son, but these monsters in black robes do not even allow that. What is happening to me is a representative example of story of about 25 million US citizen children and their parents, other than perhaps the crime is accentuated because I am a foreigner who does not have any legal right to even earn a livelihood here in the US.

SCOTUS receives a lot of certiorari applications. Therefore, it is possible that my certiorari applications, this one and 18-5187 slipped through the cracks and the judges did not actually understand the gravity of the situation.

in which judges consume their own feces, rot as they live and will be cast into everlasting fire upon death and die as Hrinakshyap was killed by Lord Narsingh or are idiots or malice ridden buffoons (Please see Exhibits F and G and the Appendix "How I a law abiding citizen and my minor son were punished.." attached to this petition.)?

OR IN THE ALTERNATIVE

How the FUCK does a child FUCKING petition this FUCKING court² to be with his father?

OR IN THE ALTERNATIVE

How the FUCK do I escape the torture of the judiciary of this country with my son?

OR IN THE ALTERNATIVE

How the FUCK do I seek help from nations across the world to save my son and about 25 million US children who are reeling under the brutalization of the judiciary of this country by being separated from their biological parents? Flounders

INTRODUCTION (BASTARDS³ (JUDGES OF THIS COURT) ACT WITHIN YOUR JURISDICTION AND FOLLOW YOUR OWN FUCKNG LAWS)

Sometime ago, it was alleged that the president of this country called some of the countries of the world as '*shit-hole*' countries. By '*shit-hole*,' I am guessing the honorable president referred to the anus, an organ in the human body through which they defecate. Anus, as we all are aware, is an important organ. An

That is not my mistake. I put the gravity of the situation very clearly. It is the system of this court that failed. My anger on the judges of this court is justified.

² In all fairness, I see that this court has made groundbreaking judgments over the matter in the present case *Troxel v. Granville*, 530 U.S. 57 (2000), and also in *Peirera Vs. Sessions* regarding immigration matters, but there is absolutely no implementation of these orders at the ground level. The status quo of the anarchy that these orders aimed to end is continuing. Particularly, this case presents a blatant example in which the Respondent aided and abetted by the appellate courts of Georgia showed their middle finger to this court. It is not in passing orders that this court fails, it is in ruthless implementation of its orders that this court flounders. In the absence of their implementation, the orders, no matter how justified or groundbreaking, are meaningless.

³ According to American Institute of psychology – in the US, about 50% of first times marriages end in divorces. The percentage is higher for second and third time marriages according to the same source. A quick back of the envelop calculation will yield that at least about 60 to 70 percent marriages fail in the US. A child born outside of wedlock is a bastard. Since most children in the US, due to high percentage of divorces are born outside of the current wedlock, most of the children in the US are bastards. The US has become a land of bastards because of the ambivalence of the judges of this court. Therefore, calling the judges bastards for the twin reasons enumerated above is factual.

improperly working anus can wreak havoc with the functioning of the human body. I have no opinion about the opinion of the honorable president. However, I am sure, he will agree with me, that irrespective of where the anus is, the shit (feces) of the whole world, is right here in America and exists as the judiciary in the US, particularly, most members of the Georgia judiciary and many members in the federal 11th circuit. U.S.A. is a great country and Americans are very constructive, conscientious and sensible citizens of the world, but this country has the most inhuman and lawless judiciary in the history of mankind. My son and I, who are both Indian citizens, are being subjected to extremely inhuman treatment in this lawless country by that shameless and corrupt judiciary. The treatment is being meted in **disregard** of international treaties of the **Hague convention against international child retention** or abduction duly codified such as federal law I.C.R.A. (22 U.S.C. 9001 through 9011) and Georgia's statutory provision about **subject-matter jurisdiction** for divorce actions as defined by O.C.G.A. 19-5-2. (Please read the complete story of the stupidity of the US courts in the Appendix "How I a law abiding citizen and my minor son were punished.." attached to this petition and Exhibits A through G. Exhibit A is my appellant's brief that I submitted to Georgia appellate courts; item 6, in the arguments section on page 20 of the brief is particularly important to understand the absence of subject matter jurisdiction. Additionally, items 2 through 5 explain why the judgment by the respondent is void on its face. Exhibits B through G my filings to the appellate courts of Georgia, initially requesting and then cajoling them to perform their judicial duty and stop the inhuman abuse and persecution of me and my minor son.)

BACKGROUND

The fundamental point of this humongous amount of litigation, between me and US administration, is that do the US courts have jurisdiction to grant divorce to two foreigners who were living in their own country at the time of filings of the divorce petition and who had no bona fide status to be in the US. In other words, do the US courts have jurisdiction over divorce litigation between every married couple across the globe?

One would say what kind of a stupid question is that? And then they will reply – Of course not!! To get this obvious answer to this question, I approached the court of appeals of Georgia (about 25 times), the Supreme Court of Georgia (about 15 times), federal district court of northern district (about 8 times), federal court of appeals, eleventh circuit (about 8 times) and this court (about 5 times). Obviously, these

courts cannot answer that question in the affirmative. The world will laugh at them. Therefore, the judges of these courts, or idiotic buffoons that they are, try to evade the question. I call them idiotic buffoons because they do not even realize that questions of subject matter jurisdiction cannot be waived and it can be raised at any time, in front of any court, whenever it becomes of interest to the parties. The manner and form of raising the question is not a constraint in giving an answer to that question. So this question will keep hanging like a sword over their naked necks every night that they sleep, until of course they attend to it.

A lower Georgia court act in absence of jurisdiction condoning an immigration fraud: I am an Indian citizen, who was living in India along with my Indian citizen wife and child. My then wife, Tanya Singh Dixit (Tanya Singh), had a mad desire to be in the US. Towards that end, she applied for a lot of visas through the US embassy in India. All those visas were rejected. Therefore, as an alternate and fraudulent means to enter the US, while we were all still in India, she filed a divorce case against me in a state in the US, Georgia. According to Georgia law, O.C.G.A. 19-5-2, the divorcing couple needs to be bona fide residents of this state at least 6 months prior to the filing of the divorce case. According to the US constitution, Article 1, section 8, clause 4, immigration is a federal issue. The unequivocal authority of the US federal government over matters of immigration has been attested by none other than the Supreme Court several times during the court's history. Please see *Trump v. Hawaii*, No. 17-965, 585 U.S. (2018). As such, when US federal authorities denied visas to Tanya Singh, her bona fide residence in entire of US was denied. It is ludicrous to think that she has bona fide residence in Georgia, which is a state in the US. This is where the case ends. **Yes, this case ends in one paragraph and it has taken the idiotic buffoons of the entire jurisprudence of the United States to answer this question for close to 4 years and they have still not been able to come up with a reply!!** (Please read the complete story of the stupidity of the US courts in the Appendix "How I a law abiding citizen and my minor son were punished.." attached to this petition.)

Additionally, there is also no evidence of any proper service of the divorce complaint to me.

I visited the US to inform the US courts about the fraud done by Tanya Singh and their inherent lack of jurisdiction over our divorce. However, rather than dismissing the case due to lack of subject matter jurisdiction, the court in Georgia snatched away my son from me.

The higher courts of Georgia condone the 'lawless violence' by the lower court:

I appealed this decision rendered in total lack of jurisdiction. Obviously, the appellate courts of Georgia could not have given a stamp of approval to this divorce decree rendered in total absence of jurisdiction, therefore, they kept mum. Till now I have asked the appellate courts of Georgia about 35 times, if the lower court had jurisdiction over the divorce between me and Tanya Singh, but each time the Georgia courts dismissed my filings without addressing the question about jurisdiction. I cited the four pillars of judiciary, the constitution of the United States, the federal and state statutory provisions, the supreme courts of both the United States and that of Georgia, all of which uniformly mandate courts to address the question of subject matter jurisdiction when it is posed. Those pillars of judiciary also mandate that courts vacate void judgments at their first sight.

I am pro se. I have no hesitation in accepting that I do not know law, let alone US law. All I wanted was that Georgia appellate courts say that the Georgia superior court indeed had subject matter jurisdiction to enter the divorce decree between two foreigners situated in their own country without whose visa had been declined several times by the US embassy of that country OR vacate the void order by the lower court. However, the Georgia courts neither said that the subject matter jurisdiction was proper, nor did they vacate the lower court's divorce decree. They just kept on dismissing my filings. (Please search my last name 'Dixit' on the docket search page of both the court of appeals and Supreme Court of Georgia to see my filings and arguments therein).

My protests against the inhuman treatment of my minor son result in my incarceration: My son, at that time just five, was going through a harrowing ordeal. He was summoned to the open court room by the inhuman monster judge Christopher Brasher, who is the Respondent for this case, and forced him to separate from me. My son cried and resisted. Gun totting sheriffs were used to subdue him and me. My son is incarcerated in a foreign land without his wish. He missed his family and friends in India. Obviously, I as a father could not see his pain and torture at the hands of the judiciary of Georgia. I cursed the judges, but even this did not cajole them to perform their judicial duties. At this point, I discovered that the inhuman treatment meted to my son is the norm across the nation in the US. I, therefore, took up the cause against the abuse of other minor children across the US as well.

As my protestations for human rights of my son to return to his country of

citizenship grew louder, the Georgia appellate courts conspired with the Immigration and Customs Enforcement (ICE) to incarcerate me. Similar to the divorce action of Georgia, the removal proceedings were conducted in absence of jurisdiction. Despite me having zero criminal convictions during my entire stay in the US, I am incarcerated without bail among people who have committed highest degree of crimes. This extrajudicial and unusual punishment is being given to me to silence my rightful call for justice.

Please see my appellant's brief and the answer to response by the appellee in the Georgia court of appeals case A18A1628 for evidences supporting the facts herein. The former document is attached as Exhibit A.

RELEVANCE TO THIS PETITION OF REHEARING

The baseless litigation, without any subject matter jurisdiction, is continuing with more and more active actors being added. It is a fundamental premise, if you wash/wipe somebody else's backside, your hands WILL get dirty. It was the Respondent, who first defecated over the constitution of this country and the blood of the valiant soldiers of this great country in open courtroom when he rendered a judgement in absence of subject matter jurisdiction. He continued his defecation in a variety of forms. (Please read the section "State courts of Georgia violated jurisdictional principles.." in the Appendix "How I a law abiding citizen and my minor son were punished.."). Rather than just flushing the defecation of the Respondent, the judges of the court of appeals, supreme court of Georgia and even this court, tried to wipe the feces of the judge/respondent with their hands as they too added their zero cents worth of feces. It does not take a lot of imagination to understand what happened to the robes and hands and gavel of the dishonorable judges; they also became dirty with the feces of the Respondent and their own excreta. The characteristic of feces is that it stinks. I only opened the ignoble court rooms where these dirty acts were happening and shone the light from far away as I covered my nose. The question is has the US jurisprudence reached a critical mass of feces for the courts to flush or do they want to continue to play in the dirt?

GROUND FOR REHEARING

Did the court of appeals of Georgia exacerbated the err of the Respondent⁴ by dismissing a duly granted discretionary appeal, thereby flitting yet another chance to either vacate the order, of the respondent, which is void on its face or to give it legitimacy by calling it not void?

As I already described above, the appellate courts of Georgia have, as yet, neither vacated the final order of the Respondent, which, I contend, is void on its face because it is entered in absence of subject matter jurisdiction, nor have they called that order as not being void. In Georgia, divorce decrees are appealed by first filing a discretionary appeal. The Georgia court of appeals first granted my discretionary appeal giving a valid legal reason. Please see Exhibit-H. According to Georgia law, after discretionary appeal is granted, all matters that pertain to the case may be raised. I raised the matter of the judgment being void on its face because it was entered in absence of subject matter jurisdiction and other reasons. My arguments were obviously watertight. (Please read the first subsection in the section Background and the appellant's brief attached as Exhibit-1). The Georgia court of appeals is hand and glove with the respondent. Therefore, they tried to legitimize the void decree by duplicity. The court would have had to vacate the order by the Respondent. Therefore, they denied my already granted discretionary appeal without giving any legitimate legal reason countering the reason of grant of the appeal. (Please see Exhibit I). As such, it is clear that the Georgia court of appeals has used duplicity to suffocate grant of justice. By repeatedly (more than 35 times) not taking a call on if the judgment by the Respondent in the case between me and Tanya Singh Dixit is void on its face, the appellate courts of Georgia have departed so far from the norm that it needs an interference of this court to prevent further ignominy to the American judiciary and erosion of judicial integrity. Additionally, it will be very unfortunate if this court chooses to remain a mute spectator to the manifest injustice to me and my minor son.

On top of having a void judgment on its face, the Respondent and the criminal judiciary of Georgia are trying to hold me in contempt of that void order.

⁴ The Respondent erred in rendering a judgment which is void on its face because it was entered in absence of subject matter jurisdiction and other causes as enumerated in Appellant's brief submitted to court of appeals of Georgia. Please see the background and Exhibit A.

CONCLUSION

Wherefore I ASK that

1. This petition and the certiorari be granted.

OR in the alternative

Georgia court of appeals be ordered to en banc consider the case A18A1628 on whether the divorce decree entered by the Respondent is void on its face.

2. I be allowed unfettered access to my son and the Respondent and/or my wife Tanya Singh Dixit be given reasonable time to justify why and my son should be separated from me.
3. I and my son be allowed any other relief that this court deems just.
4. This court immediately passes an interim injunction that all biological parents of children in US will have full access to their children at all times unless it has been proven without reasonable doubt that the parent had been abusive towards the child by clear and verifiable evidences vetted by psychologist and a pediatrician.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 28, 2019. Akash Dixit Signature.

Respectfully,

Akash Dixit

Akash Dixit, PhD.
Irwin County Detention Center,
Prisoner #59514,
132 Cotton Drive, Ocilla, GA, 31774

APPENDIX

FACTUAL HISTORY OF HOW I, A LAW ABIDING RESIDENT, AND MY MINOR CHILD WERE PUNISHED AND PEOPLE WHO ACTUALLY CONDUCTED AN IMMIGRATION FRAUD AND FRAUD UP THE COURT ARE STILL ROAMING FREE IN THE US

IN THE SUPREME COURT OF THE UNITED STATES
CERTIFICATE AS REQUIRED BY RULE 44.1 AND 44.2 OF THIS COURT

Akash Dixit Vs. Christopher Brasher, Judge Case number 18-7213

CERTIFICATE IN COMPLIANCE AND TIMELINESS

I, Akash Dixit, Petitioner for the above application for rehearing, hereby files this certificate in compliance with rules 44.1 and 44.2 of this court.

I hereby certify that this petition of rehearing is presented in good faith and not for delay. I further certify that this petition is restricted to ground specified in paragraph 44.2.

I hereby certify that this petition of rehearing was deposited with the internal mail system of prison where I am incarcerated on March 28, 2019, which is within 25 days of the order denying the petition for writ of certiorari.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 28, 2019. Akash Dixit Signature.

Respectfully,

Akash Dixit

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**Additional material
from this filing is
available in the
Clerk's Office.**