No. _____

In The

Supreme Court of the United States

MOSES MCCORMICK, et al.,

Petitioners,

vs.

KIM A. BROWNE, et al.,

Respondents.

On Petition For Writ Of Certiorari To The United States Court Of Appeals For The Sixth Circuit

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1.) In light of this Court's recognition in *Owen v. City of Independence*, 445 U.S. 635-658 (1980), "A Municipality has no immunity from liability under 1983 flowing from its constitutional violations and may not assert the good faith of its officers as a defense to such liability" Would leave to Amend the Plaintiff's Complaint be considered futile if the Municipality with no immunity can be added as a defendant and held liable for the multiple undisputed Fourteenth Amendment violations for customs adopted by its officials?

2.) With Respect to this Court's Decision in *Pulliam v. Allen*, 466 U.S. 528-543 (1984), is injunctive relief automatically barred to a Plaintiff if an Official is Immune to Monetary Damages under 42 U.S.C. § 1983, and their Judicial Process is not self-correcting and has no remedy at law?

3.) In light of this Court's opinion in *United States v. Price*, 383 U.S. 794-795, is leave to amend a Complaint futile if a private person jointly conspiring with State officials to willfully violate a citizen's rights secured by the Fourteenth Amendment to the United States Constitution be held liable for monetary damages under 42 U.S.C. § 1983?

4.) Are 42 U.S.C. § 1983 Complaints filed in District Court considered a petition to the government for redress as set forth in the First Amendment to the United States Constitution?

QUESTIONS PRESENTED – Continued

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5.) With respect to this Court's Decision in *Hafer v. Melo*, 502 U.S. 25-31 (1991), can state officials be held liable in their individual capacity for monetary damages under 42 U.S.C. § 1983 based upon actions taken in their official capacity?

PARTIES TO THE PROCEEDINGS AND RULE 29.6 STATEMENT

The parties to the proceedings in the court whose judgment is sought to be reviewed are:

- Moses McCormick and Mark McCormick, Plaintiffs and Appellants and Petitioners herein.
- Kim A. Browne and Bryan K. Elliot, Defendants and Appellees and Respondents herein.

There are no publicly held corporations involved in this proceeding.

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Moses McCormick, and Mark McCormick with respect and integrity Petition for a Writ of Certiorari to review the orders of the United States Sixth Circuit Court of Appeals' opinions reproduced in the appendix to this petition (App. 1) and (App. 5) also the order of the United States District Court for the Southern District of Ohio, Eastern Division. (App. 6)

BASIS FOR JURISDICTION IN THIS COURT

The United States Court of Appeals for the Sixth Circuit filed its opinion on September 18th, 2018, *Moses McCormick, et al. v. Kim Browne, et al.*, this Court has jurisdiction under 28 U.S.C. § 1254(1) to review on Writ of Certiorari the Sixth Circuit's September 18th, 2018 decisions.

CONSTITUTIONAL AND STATUTORY PROVISIONS AT ISSUE

Petitioners brought the underlying action under 42 U.S.C. § 1983 which states:

> Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured

> by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory relief was unavailable. For the purposes of this section, any act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.

Petitioners allege that the Respondents violated their rights under the Fourteenth Amendment to the United States Constitution section 1 which reads as follow:

> All persons born or naturalized in the United States and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; Nor shall any State deprive any person of life, liberty or property, without due process of law; Nor deny to any person within its jurisdiction the equal protection of the laws.

STATEMENT OF THE CASE

The undisputed facts are based on citations to the record:

The case arises out of a Divorce proceeding filed on June, 14th 2016 by petitioner's wife. (App. 1) The Divorce was filed against petitioner when he did not submit to his wife's demands to sign pre-filled in dissolution papers. The petitioner refused to sign the dissolution docs because they were pre-filled in and contained unjust stipulations that would deny him 100% of Marital Assets and limit custody of his 3 daughters to see them on weekends only. The case was subsequently before both Respondents Kim A. Browne (administrative judge) and Bryan K. Elliot (acting magistrate).

The Divorce complaint contained false accusations of cruelty, adultery and neglect of duty. Those accusations were not facts before the Court. The petitioner's wife had no witnesses, no affidavits from witnesses or evidence to corroborate the allegations contained in her Divorce complaint. Petitioner's wife admitted in Court on the record that her allegations were not true during one of the Court Proceedings in Respondent Bryan K. Elliot's Court room.

Petitioner Moses McCormick was represented by 3 Attorneys throughout the duration of the proceedings who were later found to be accessories to the scheme to embezzle at least $250,000 in Marital Assets that would be due to Petitioner. The evidence recovered by Petitioners suggest that both Respondents herein acts were in concert with the 3 Attorneys who represented Moses, and his wife and her Attorney. The Respondents committed acts that were not consistent with Title 5 U.S.C. § 556(d) and they were collectively

involved with the other State individuals to force Petitioner to settle out of court, and divide his Marital Assets amongst one another once he signed the papers to settle out of court.

The evidence suggest the Respondents were paid a bribe out of a hidden Trust account at Petitioner's wife's Lawyer's Law Firm the Law Offices of William L. Geary L.P.A. in Columbus, Ohio. Suggestive by the evidence, the Respondents were paid to delay the Divorce case as long as they possibly could until the Petitioner Moses McCormick would agree to the dissolution and out of Court settlement.

The Divorce case was delayed and delayed and delayed purposely to get the Petitioner financially drained and emotionally drained so he would just give up and settle out of court for $30,000 that they offered him.

Petitioner Moses McCormick is an independent language instructor and was a full-time parent to his 3 daughters since the day they were born and Respondent Bryan K. Elliott issued a Court order that was not appealable due to it being classified as a "temporary order" which stated that Moses McCormick must take his 3 Daughters to daycare which cost $634 per week. Respondent Kim A. Browne upheld the order and adopted its orders.

The evidence suggests this act was done to purposely compel Moses McCormick to start being liable for Child Support and daycare expenses. (App. 2) The said order deprived the Petitioners Moses McCormick

and his brother Mark McCormick who resided with him at the time, life and liberty with the children. Petitioner Moses McCormick exercised his rights and immunities secured by the United States Constitution and he represented himself in Court waiving none of his rights. His brother, Mark McCormick, was a witness who testified before both Respondents under oath.

Petitioner Mark McCormick testified that Moses McCormick was unable to pay his own bills and the unconstitutional fines imposed upon him by the Respondents. Such testimony was completely disregarded and the Petitioner Mark McCormick was deprived of about $4,000 that he himself paid out on behalf of his brother Moses McCormick. Moses McCormick was financially disabled at the time. Petitioner Moses wife was earning $120,000 annually at the time and all requests for temporary spousal support was denied to him completely by both respondents. Petitioner's wife violated the Respondents orders and removed Petitioner Moses McCormick from all their credit accounts.

Both Respondents did nothing to reprimand her and allowed her to do this because she paid them via the trust account that was illegally concealed from Petitioner Moses McCormick. Both Respondents shielded any ability to have the "temporary orders" modified and this deprived both Defendants Rights secured by the United States Constitution. (App. 6) The Petitioners filed a 42 U.S.C. § 1983 action in the United States District Court for the Southern District of Ohio on July 10th, 2017 against both Respondents. (App. 6) Kim A.

Browne (In her individual capacity) and Bryan K. Elliot (In his official capacity). (App. 2) The Petitioners have not seen the children for nearly 2 years to the date of this Petition. (App. 2) The Respondents acts forced Petitioner Moses McCormick to also file Chapter 7 Bankruptcy in the United States Bankruptcy Court for the Southern District of Ohio located in Columbus, Ohio.

The Petitioners sued other State officials in State Court under Statutes set forth by the Ohio Supreme Court. Suggestive by the evidence obtained by both Petitioners, the alleged acts are conduct and customs that are adopted and regularly performed at the Franklin County Domestic Court in Columbus, Ohio. Both Respondents allowed no remedy available to mitigate damages to both Petitioners and their rights secured by the United States Constitution. No appeal was available and no motions to modify were granted even though Petitioner Mark McCormick paid off all fines both respondents imposed upon Moses. Moses McCormick knew the fines were unconstitutional but he did not want to appear unreasonable so they were paid in full and still no remedy was available.

The Respondent Bryan K. Elliot ordered Moses McCormick to take another parenting class for no reason. In fact, the Guardian Ad Litem on the case advised the Respondents under oath "I see no problem at all with his parenting" Both respondents ignored that information and continued to stonewall the Divorce proceedings to force Petitioner Moses McCormick to accept the out of court settlement for $30,000.

Respondent Bryan K. Elliot allowed a motion for a psychological evaluation to be entertained in his court against Petitioner Moses McCormick unconstitutionally. The Said motion was not supported by any evidence, witness or affidavits that would give it merit or make it a triable fact before the Court.

These were all tools used to further frustrate and harass Moses McCormick into an "Out of Court" settlement. Respondent Bryan K. Elliott was advised by Moses McCormick that the Motion was repugnant to his rights secured by the United States Constitution and Respondent said "they are throwing the motion out ok". (App. 2) Respondent chose to throw it out because he knew the Petitioners had foiled their scheme that was constructed by Petitioner's wife and her counsel. (App. 2)

Respondent Kim A. Browne made violent threats on the record to Petitioner Moses McCormick advising him "you know we can have that Trigger pulled on you at any time right?" These threats were harmful to both Petitioners due to the fact that Police officers that work for the Columbus Division of Police were calling Petitioner Moses McCormick's cell phone at night advising him to "Stop being a bitch". Petitioner Moses McCormick also received $4,000 worth of vandalism to his motor vehicle. The evidence suggests those acts were requested by the Law Firm that his wife's Attorney works for.

The Respondents did not deny any of these allegations set forth they just asserted "Absolute Immunity"

which both Petitioners knew they would assert, but the acts committed by the Respondents were not judicial acts at all they were criminal acts as classified under title 18 U.S.C. §§ 242 & 243. Respondents were committing acts under the guise of Judicial Acts and are liable to the Supreme Authorities to the United States Constitution.

Petitioner Moses McCormick tried all remedies that are legally in place on the State level to get relief from the said acts, all were ferociously denied. Both Petitioners have been burdened with undue delay after delay and denial after denial.

PROCEDURAL BACKGROUND

Petitioners Moses McCormick, and Mark McCormick filed a complaint under 42 U.S.C. § 1983 Against Respondent Kim A. Browne in her personal capacity and Bryan K. Elliot in his official capacity on July 10th, 2017 at the United States District Court for the Southern District of Ohio Eastern Division. (App. 6) The said complaint was filed for violations of the United States Constitution thus violating their sworn oath of office. The Petitioners were not represented by an Attorney in the lower District Court and waived no rights secured by the United States Constitution. Petitioners invoked all rights on the docket of the lower district Court and waived no rights.

Petitioners set forth facts in their complaint that were not addressed or denied by any of the

respondents or their counsel. The Respondents submitted a 12(b)(6) motion. (App. 3) The lower Court granted the motion. When Petitioners responded to the 12(b)(6) Motion submitted by the respondents they requested leave of court to Amend the Complaint. That leave was requested at the very early stages of the case before the lower district Court made any rulings whatsoever. The leave of Court was denied and the lower Court granted the Respondents 12(b)(6) motion.

The Petitioners appealed to the United States Court of Appeals for the Sixth Circuit located in Cincinnati, Ohio on January 3rd, 2018. The Respondents and their Counsel filed an appearance on the record of the appeals court on April 9th, 2018. The Petitioners filed an Emergency Injunction on September 6th, 2018. On September 18th, 2018, the Emergency injunction was unopposed by the Respondents and was denied by the Sixth Circuit Court of Appeals. The lower Court's opinion was also affirmed as well. The Court of Appeals *cited Brookings v. Clunk*, 389 F.3d 614, 617 (6th Cir. 2004), stating judicial Immunity is not overcome by allegations of bad faith or malice. The Appeals Court also held any injunctive relief requested is barred because "the McCormicks failed to allege that Browne and Elliot violated a declaratory decree or that declaratory relief was unavailable." (App. 4)

REASONS WHY CERTIORARI IS WARRANTED

Review is warranted because the Sixth Circuit's Opinion is in direct conflict with this Court's decision and the Third Circuit Decision in *Hafer v. Melo*, 502 U.S. 21 (1991), in that case the district court dismissed the claims under *Will v. Michigan Dept. of State Police*, 491 U.S. 58, 71, in which the Court held that State Officials "acting in their official capacities" are outside the class of "persons" subject to liability under 42 U.S.C. § 1983.

In reversing this ruling, the Third Circuit Court of Appeals found that Respondents sought damages from Hafer in her personal capacity and held that, because she acted under color of State law, respondents could maintain a 42 U.S.C. § 1983 Individual-Capacity suit against her.

Held: State officers may be held personally liable for damages under 42 U.S.C. § 1983 based upon actions taken in their official capacities. Pp. 25-31.

(a) The above-quoted language from Will does not establish that Hafer may not be held personally liable under 42 U.S.C. § 1983 because she acted in her official capacity. The claims considered in *Will* were official capacity claims, and the phrase "acting in their official capacities" is best understood as a reference to the capacity in which the State officer is sued, not the capacity in which the officer inflicts the alleged injury. Pp. 25-27.

(b) State Officials, sued in their individual capacities, are "persons" within the meaning of 42

U.S.C. § 1983. Unlike official-Capacity defendants who are not "Persons" because they assume the identity of the government that employs them, *Will supra*, at 71-officers sued in their personal capacity come to the Court as individuals and thus fit comfortably within the statutory term "persons" cf. 491 U.S., at 71, n. 10. Moreover, 42 U.S.C. § 1983's authorization of suits to redress deprivations of civil rights by persons acting "under color of" State law means that Hafer may be liable for discharging respondents precisely because of her authority as auditor general. Her assertion that acts that are both within the officials authority and necessary to the performance of government functions (including the employment decisions at issue) should be considered acts of the State that cannot give rise to a personal-capacity action in unpersuasive. That contention ignores this Courts holding that 42 U.S.C. § 1983 was enacted to enforce provisions of the Fourteenth Amendment against those who carry a badge of a State and represent it in some capacity, whether they act in accordance with their authority or misuse it. *Scheuer v. Rhodes*, 416 U.S. 232, 243. Furthermore, Hafer's theory would absolutely immunize State officials from personal liability under 42 U.S.C. § 1983 solely by virtue of the "official" nature of their acts, in contravention of this Court's Immunity seen in e.g., *Scheuer, Supra*. Pp. 27-29.

(c) The Eleventh Amendment does not bar 1983 personal-capacity suits against State officials in Federal Court.

The Petitioners herein, Moses McCormick and Mark McCormick, went to the government to seek redress consistent with the First Amendment to the United States Constitution which reads "Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the government for a redress of grievances."

The Opinion of the Sixth Circuit could put a massive burden upon the United States Citizens who are victims of judicial corruption. This can present a major conflict with the First Amendment to the United States Constitution which would leave the public hopeless with nowhere to turn to as victims of corruption and seekers of proper redress for the abridging of their rights. The opinion of the Sixth Circuit is repugnant to the United States Constitution's First Amendment.

The Sixth Circuit's Opinion also conflicts heavy with this Court's decision in *Owen v. City of Independence*, 445 U.S. 622 (1980), which this Court held that "a municipality has no immunity from liability under 42 U.S.C. § 1983 flowing from its constitutional violations and may not assert the good faith of its officers as a defense to such liability.

The Sixth Circuit's opinion is also in conflict with *the (9th Cir.) Opinion in Breier v. Northern California* which held "A party may Amend his pleading once as a matter of course at any time before a responsive pleading is served." *Federal Rule of Civil Procedure*

15(a) A motion to dismiss is not a responsive pleading within the meaning of the rule.

Neither the filing nor granting of such a motion before an answer terminates the right to amend; an order of dismissal denying leave to amend at that stage is improper, and a motion for leave to amend (though unnecessary) must be granted if filed. *Case v. State Farm Mut. Auto. Ins. Co.,* 294 F.2d 676, 678 (5th Cir. 1961) (dictum); *Fuhrer v. Fuhrer*, 292 F.2d 140, 142 (7th Cir. 1961).

Certiorari should be granted also because the Sixth Circuit's opinion is also in conflict with the *Fifth Circuit opinion in Sayre v. Shoemaker,* 263 F.2d 370, 371 (5th Cir. 1959), which held *"We think that appellant should be afforded the opportunity to amend and the appellee's an opportunity to invoke the ruling of the district Court as to jurisdiction and as to the merits on such specific amendment or amendments, as the appellant may offer. Only in that way, and further perhaps by motion or motions for summary judgement and affidavits in support of and in opposition thereto, can either the district Court or this Court be certain that it is passing upon an actual rather than a supposed or fictitious controversy."*

The Sixth Circuit's Opinion is in Conflict with the Decision held in Trinsey v. Pagliaro, 229 F. Supp. 647 (D.C. Pa. 1964), *which states "The defendant's motion to dismiss for failure to state a claim unsupported by affidavits or depositions is incomplete because it requests this court to consider facts outside the record*

which have not been presented in the form required by rules 12(b)(6) and 56(c). Statements of counsel in their briefs or arguments while enlightening to the Court are not sufficient for purposes of granting a motion to dismiss or summary judgment."

The Sixth Circuit's Opinion conflicts heavy with this Court's decision as held in *Pulliam v. Allen*, 46 U.S. 522 (1984), this Court held "Judicial Immunity is not a bar to prospective injunctive relief against a judicial officer, such as petitioner acting in her judicial capacity." Pp. 466 U.S. 528-543.

The Sixth Circuit's Opinion is in conflict with the *(2nd Cir.)* opinion in *Platsky v. C.I.A.*, 953 F.2d 26. On appeal, the *Second Circuit* found that the lower Court erred in failing to allow the Plaintiff to replead his claims. More precisely, the Court of Appeals agreed that Platsky incorrectly named as defendants' government agencies immune from civil liability under *Bivens,* but admonished this Court for failing to explain the correct form to the Pro Se Plaintiff so that Platsky could have amended his pleadings to name individuals rather than agencies as the defendants.

The Sixth Circuit's opinion is in conflict with *Article 6, Paragraph 2*, of the *United States Constitution* which reads "This Constitution, and the laws of the United States which shall be made in pursuance thereof and all treaties made, or which shall be made, under the authority every State shall be bound thereby, anything in the Constitution or laws of State to the Contrary notwithstanding."

Review should be granted because It is of imperative public importance that State official's actions are in accordance to title 5 U.S.C. § 556(d) which reads: *Except as otherwise provided by statute, the proponent of a rule or order has the burden of proof. All government agencies including the IRS has to follow the administrative procedures act.*

Review should be granted also because this Court's opinion in *Monroe v. Pape*, 365 U.S. 167 (1961), holding: "A party does not need to seek a State remedy before seeking a Federal remedy under 42 U.S.C. § 1983, since these remedies are supplemental. "The Sixth Circuit's opinion is clearly repugnant to this holding and the First Amendment to the United States Constitution.

The Sixth Circuit's opinion is in heavy conflict with Federal Rule of Civil Procedure 15(a)(2) provides; "Leave to amend the complaint should be given freely when justice so requires it." and denial of the motion without any apparent justifying reason was an abuse of discretion. Also, in *Foman v. Davis*, 371 U.S. 178 (1962), this Court held: "The Court of Appeals also erred in affirming the District Court's denial of petitioners motion to vacate the Judgment of dismissal in order to allow amendment of the complaint, since it appears from the record that the amendment would have done no more than State an alternate theory of recovery." The holding in *Foman* is consistent with Fed. R. Civ. P. 15(a).

The Sixth Circuit's opinion took a major departure from this Court's decision as held in *United States v. Price*, 383 U.S. 787 (1966), which held *"To act under color of law does not require that the accused be an officer of the State. It is enough that he is a willful participant in joint activity with the State or its agents."*

Review is warranted because the Sixth Circuit's Opinion Conflict with this Court's opinion in the landmark Decision of *Cooper v. Aaron*, 358 U.S. 1 (1958), where this Court held "States must obey the decisions of the United States Supreme Court and cannot refuse to follow them." The States are bound by the United States Supreme Court's decisions and must enforce them even if the "States" disagree with them. The precedent in this case would be consistent with the United States Constitution Article 6, Clause 3.

The Senators and Representatives before mentioned, and the members of the Several State legislatures, and all executive and judicial officers, both of the United States and of the Several States shall be bound by Oath or Affirmation, to support this constitution; but no religious test shall ever be required.

Certiorari should be granted for review of the Sixth Circuit's opinion *in Monell v. Department of Soc. Svcs.,* 436 U.S. 658 (1978), held *"Municipalities cannot have arranged their affairs on an assumption that they can violate constitutional rights for an indefinite period; accordingly, municipalities have no reliance interest that would support an absolute immunity."* Pp. 436 U.S. 699-700. Local governments sued under 42 U.S.C.

§ 1983 cannot be entitled to an absolute immunity, lest today's decision "be drained of meaning." *Scheuer v. Rhodes*, 416 U.S. 232, 248. *Monell*, 436 U.S. at 701.

Certiorari should be granted to Petitioners herein due to the Sixth Circuit's Opinion in further conflict with the Eighth Amendment to the United States Constitution which held: Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted.

This Court should also Grant Certiorari for review due to the Sixth Circuit's Opinion in conflict with this Court's opinion in *Marbury v. Madison*, 5 U.S. 1 Cranch 137 (1803), which held: *"Congress cannot pass laws that are contrary to the Constitution, and it is the role of the judiciary to interpret what the Constitution permits."* In light of this Court's Decision the Sixth Circuit's Opinion contravene the heart of the landmark decision. Furthermore, petitioners are due redress for grievances and have a right to petition the government to seek redress as held in the First Amendment to the United States Constitution.

Certiorari should be granted because the Sixth Circuits opinions are in conflict with this Court's decision in *Haines v. Kerner*, 404 U.S. 519 (1972), which state "Pro Se complaint seeking to recover damages for claimed physical injuries and deprivation of rights in imposing disciplinary confinement should not have been dismissed without affording him the opportunity to present evidence on his claims. This decision is also consistent with the holding in *Foman.*

Petitioners Moses McCormick and his brother Mark McCormick should have been given an opportunity to name other Defendants in their complaint in the lower district court. They should have been afforded to add facts as they deemed adequate, and they should have also been granted injunctive relief. There existed no remedy at law on the state level to cure or mitigate damages and violations of their rights caused by both respondents herein.

Petitioners successfully demonstrated to the Sixth Circuit Court that there existed no remedy at law and provided all the supporting documents in the motion for injunctive relief.

REVIEW IS NEEDED BECAUSE THE SIXTH CIRCUIT'S OPINION IS REPUGNANT TO THE *NINTH AMENDMENT TO THE UNITED STATES CONSTITUTION* WHICH HOLDS *THE ENUMERATION IN THE CONSTITUTION, OF CERTAIN RIGHTS SHALL NOT BE CONSTRUED TO DENY OR DISPARAGE OTHERS RETAINED BY THE PEOPLE.*

CONCLUSION

For the foregoing reasons, the petition for writ of certiorari should be granted.

Submitted with Respect & Integrity,

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