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SUPREME COURT U.S.

IN THE

SUPREME COURT OF THE UNITED STATES

STEPHEN DANIEL LEONARD — PETITIONER  
(Your Name)

VS.

GEORGE WASHINGTON UNIVERSITY — RESPONDENT(S)  
HOSPITALS et. al.

ON PETITION FOR A WRIT OF CERTIORARI TO

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

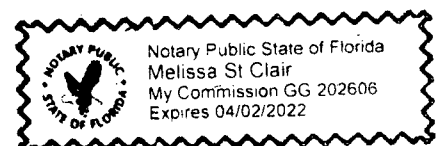
PETITION FOR WRIT OF CERTIORARI

STEPHEN D. LEONARD (#448091)  
(Your Name)

19000 S.W. 377 St.  
(Address)

Miami, FL. 33034  
(City, State, Zip Code)

—  
(Phone Number)



*Melissa St Clair*

12-27-18

### QUESTION(S) PRESENTED

1. Did the United States Court of Appeals Abuse its Discretion when Denying Prose Petitioner Appointment of Probatio Counsel?
2. Did the United States Court of Appeals Err when granting Respondent's Motions for summary affirmance when the Claims on Appeal clearly cited that District Court Judge acted with Vindictiveness and made arguments on behalf of defendant's then ruled upon those very arguments?
3. Did the United States Court of Appeals violate Petitioner's right to a Full and Fair hearing in Violation of the Fourteenth Amendment, United States Constitution by failing to reach the merits of the Claims on appeal?
4. Did the United States Court of Appeals violate Petitioner's Human Rights under Article's 1, 2, 3, 5, 6, 7, 8, 9, 10, 12, 13(1), (2), 14(1), 19, 28, and 30 of the Universal Declarations of Human Rights by granting Appellee's summary affirmance which denied Petitioner's rights to a hearing and trial and/or "an effective remedy by a competent national tribunals for acts violating the fundamental rights granted him by the Constitution or by law"?
5. Did the United States Court of Appeals violate Petitioner's rights to Due Process under Amendment Fourteen, United States Constitution, when failing to convene a three judge Panel upon a Petition for Panel Rehearing?

## LIST OF PARTIES

~~All parties appear in the caption of the case on the cover page.~~

☒ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

1. George Washington University Hospital <sup>/ George Washington University :</sup> % Thomas V. Monahan; 1 S. St. 20 fl. Baltimore, Md. 21202 : turn2qldlaw.com : (410) 783-4000
2. Georgetown University Hospital / Georgetown University : % William D. Nussbaum; 1919 Pennsylvania Ave., N.W. Washington, D.C. 20006 : wnussbaum@saul.com : (202) 333-8800
3. District of Columbia Police Department / City of District of Columbia : Mary L. Wilson, Todd S. Kim, Loren L. AliKhan : 441 4th St., N.W. One Judiciary Square, 6th fl. Washington, D.C. 20001 : Mary.wilson@d.c.gov : todd.kim@d.c.gov : loren.aliKhan@d.c.gov : (202) 727-3400
4. District of Columbia Animal Shelter : % Derek Ludwin ; One City Center, 850 10th St. N.W. Washington, D.C. 20001 : (202) 662-6000
5. Federal Bureau of Investigation / United States Capitol Police : R. Craig Lawrence, Joshua L. Rogers ; 555 4th St. N.W. Washington, D.C. 20530 : Craig.lawrence@usdoj.gov : joshua.rogers@usdoj.gov : (202) 252-2500 / (202) 252-6829
6. District Hospital (Medstar Georgetown) : % Legal Counsel : 3800 Reservoir Rd. Washington, D.C. 20057

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IN THE  
SUPREME COURT OF THE UNITED STATES  
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

**OPINIONS BELOW**

☒ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix A to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☒ is unpublished.

The opinion of the United States district court appears at Appendix A to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☒ is unpublished.

☐ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix \_\_\_\_\_ to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

The opinion of the \_\_\_\_\_ court appears at Appendix \_\_\_\_\_ to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

## JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was July 09, 2018.

☐ No petition for rehearing was timely filed in my case.

☒ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: October 17, 2018, and a copy of the order denying rehearing appears at Appendix A.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☐ For cases from **state courts**:

The date on which the highest state court decided my case was \_\_\_\_\_.  
A copy of that decision appears at Appendix \_\_\_\_\_.

☐ A timely petition for rehearing was thereafter denied on the following date: \_\_\_\_\_, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Amendment VI, United States Constitution, which provides:

"In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial by an impartial jury of the state and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense."

Amendment XIV, subsection 1, United States Constitution, which provides:

"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."

Article 1, Universal Declaration of Human Rights (12/10/1948), which provides:

"All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood."

Article 2, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/1810 (12/10/1948), which provides:

"Everyone is entitled to all the rights and freedoms set forth in this Declaration."

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

"Without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty."

Article 3, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"Everyone has the right to life, liberty and the security of person."

Article 5, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment."

Article 6, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"Everyone has the right to recognition everywhere as a person before the law."

Article 7, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination."

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Article 8, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the Constitution or by law."

Article 9, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"No one shall be subjected to arbitrary arrest, detention or exile."

Article 10, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and any criminal charge against him."

Article 12, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks."

Article 13 (1), (2), Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"(1) Everyone has the right to freedom of movement and residence within the..."

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

"borders of each State." (2) "Everyone has the right to leave any Country including his own, and to return to his Country."

Article 14(1), Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"Everyone has the right to seek and to enjoy in other Countries asylum from Persecution."

Article 19, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"Everyone has the right to freedom of opinion and expression, this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers."

Article 28, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"Everyone is entitled to a social and international order in which the rights and freedoms set forth in this Declaration can be fully realized."

Article 30, Universal Declaration of Human Rights, G.A. Res. 217A (III), U.N. Doc. A/810 (12/10/1948), which provides:

"Nothing in this Declaration may be interpreted as implying for any State, group or person any right to engage in any activity or to perform any act aimed at the destruction of the rights and freedoms set forth herein."

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Title 18 U.S.C. § 4, Crimes And Criminal Procedure, General Provisions, Misprison of Felony, (Sept. 13, 1994, P.L. 103-322, Title XXXIII, § 330016 (1)(G), 108 Stat. 2147) which states:

"Whoever, having knowledge of the actual commission of a felony cognizable by a Court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States shall be fined under this title or imprisoned not more than three years or both."

Title 18 U.S.C. § 241, Crimes And Criminal Procedure, Civil Rights, Conspiracy Against Rights, (Oct. 11, 1996, P.L. 104-294, Title VI, §§ 604 (b)(14)(A), 607 (a), 110 Stat. 3507, 3511.) which states:

"If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same; or If two or more persons go in disguise on the highway, or on the premises of another, with intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured - They shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping, or an attempt to kidnap aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, they shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death."

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Title 18 U.S.C. § 242, Crimes And Criminal Procedure, Civil Rights, Deprivation of Rights Under Color of Law, (Oct. 11, 1996, P.L. 104-294, Title VI, §§ 604(b)(1)(B), 607(c), 110 Stat. 3507, 3511) which states:

"Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both, and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosive, or fire, shall be fined under this title or imprisoned not more than ten years, or both, and if death results from the acts committed in violation of this section or if such acts include kidnapping, or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death."

Title 18 U.S.C. § 245, Crimes And Criminal Procedure, Civil Rights, Federally Protected Activities, (Oct. 11, 1996, P.L. 104-294, Title VI, § 604(b)(1)(C), (37), 110 Stat. 3507, 3509.) which states in relevant parts: (b)(1)(B), (E):

"Whoever, whether or not acting under color of law, by force or threat of force willfully injures, intimidates, or interferes with, or attempts to..."

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

"injure, intimidate, or interfere with any person because he is or has been, or in order to intimidate such person, or any other person, or any class of persons from participating in or enjoying any benefit, service, privilege, program, facility, or activity provided or administered by the United States; participating in or enjoying the benefits of any program or activity receiving Federal financial assistance... shall be fined under this title, or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death."

Title 18 U.S.C. § 371, Crimes And Criminal Procedure, Ch. 19 Conspiracy, Conspiracy To Commit Offense Or To Defraud United States, (Sept. 13, 1994, P.L. 103-322

Title XXXIII, § 330016(D)(D), 108 Stat. 2147) which states:

"If two or more persons conspire either to commit any offense against the United States, or to defraud the United States, or any agency thereof in any manner or for any purpose, and one or more of such persons do any act to effect the object of the conspiracy, each shall be fined under this title or imprisoned not more than five years, or both."

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Title 18 U.S.C. § 1512, Crimes And Criminal Procedure, Ch. 73 Obstruction Of Justice, (Jan. 7, 2008, P.L. 110-177, Title II, § 205, 121 Stat. 2537) which states in relevant parts; (b)(1), (2)(A) & (B), (3):

"Whoever knowingly uses intimidation, threatens or corruptly persuades another person, or attempts to do so, or engages in misleading conduct toward another person with intent to - influence, delay, or prevent the testimony of any person in an official proceeding; cause or induce any person to - withhold testimony, or withhold a record, document, or other object from an official proceeding; hinder, delay, or prevent the communication to a law enforcement officer or judge of the United States of information relating to the commission or possible commission of a Federal offense ... shall be fined under this title or imprisoned not more than 20 years, or both."

Title 18 U.S.C. § 1513, Crimes And Criminal Procedure, Ch. 73 Obstruction Of Justice, (Jan. 7, 2008, Title II, §§ 204, 206, P.L. 110-177; 121 Stat. 2537) which states in relevant parts; (b)(1), (2):

"Whoever knowingly engages in any conduct and thereby causes bodily injury to another person or damages the tangible property of another person, or threatens to do so, with intent to retaliate against any person for - the attendance of a witness or party at an official proceeding, or any testimony given or any record, document, or other object produced by a witness in an official proceeding; or any information relating to the commission or possible commission of a Federal offense ... or attempts to do so, shall be fined under this title or imprisoned not more than 20 years, or both."

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Title 18 U.S.C. § 1621, Crimes And Criminal Procedure, Ch. 74 Perjury, Perjury Generally, (Sept. 13, 1994, P.L. 103-322, Title XXXIII, § 330016 (1)(I), 108 Stat. 2147.) which states in relevant parts (1), (2):

"Whoever - having taken an oath before a competent tribunal, officer, or person, in any case in which a law of the United States authorizes an oath to be administered, that he will testify, declare, depose, or certify truly, or that any written testimony, declaration, deposition, or certificate by him subscribed, is true, willfully and contrary to such oaths states or subscribes any material matter which he does not believe to be true, or in any declaration, certificate, verification, or statement under penalty of perjury as permitted under section 1746 of title 28, United States Code, willfully subscribes as true any material matter which he does not believe to be true, is guilty of perjury and shall be, except as otherwise expressly provided by law, be fined under this title or imprisoned not more than five years, or both."

Title 18 U.S.C. § 1962(c), Crimes And Criminal Procedure, Ch. 96 Racketeering Influenced And Corrupt Organizations, (Nov. 18, 1988, P.L. 100-690, Title VII, § 7033, 102 Stat. 4398.) which states in Prohibited Activities:

"It shall be unlawful for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity..."

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Title 18 U.S.C. 1963 (a), Crimes And Criminal Procedure, Ch. 96 Racketeering Influenced And Corrupt Organizations, Criminal Penalties, (Dec. 1, 2009, P.L. 111-16, § 7, 123 Stat. 1607) which states in relevant part:

"Whoever violates any provision of Section 1962 of this chapter shall be fined under this title or imprisoned not more than 20 years (or for life if the violation is based on a racketeering activity for which the maximum penalty includes life imprisonment), or both, and shall forfeit to the United States, irrespective of any State law - any interest the person has acquired or maintained in violation of Section 1962 ..."

Title 18 U.S.C. § 1964 (c), Crimes And Criminal Procedure, Ch. 96 Racketeering Influenced And Corrupt Organizations, Civil Remedies, Dec. 22, 1995, P.L. 104-67 Title 1, § 107, 109 Stat. 758.) which states in relevant part:

"Any person injured in his business or property by reason of a violation of Section 1962 of this Chapter may sue thereafter in any appropriate United States district Court and shall recover threefold the damages he sustains and the cost of the suit, including a reasonable attorneys fee ..."

Title 18 U.S.C. § 2340 A, Crimes And Criminal Procedure, Ch. 113C Torture, Torture, (Oct. 26, 2001, P.L. 107-56, Title VIII, § 811 (g), 115 Stat. 381) which states:

"Whoever outside the United States commits or attempts to commit torture shall be fined under this title or imprisoned not more than 20 years, or both, and if death results to any person from conduct prohibited by this section shall be punished by death or imprisoned for any term of years or for life

"A person who conspires to commit an offense under this section shall be subject to the same penalties (other than the penalty of death) as the penalties prescribed for the offense, the commission of which was the object of the conspiracy."

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Title 18 U.S.C. § 2441(a), Crimes And Criminal Procedure, Ch. 118 War Crimes, War Crimes, (Oct. 17, 2006, P.L. 109-366, § 6(b)(1), 120 Stat. 2633.) which states:

"Whoever, whether inside or outside the United States, commits a war crime in any of the circumstances described in subsection (b), shall be fined under this title or imprisoned for life or any term of years, or both, and if death results to the victim, shall also be subject to the penalty of death."

Title 28 U.S.C. 1331, District Courts; Jurisdiction, Ch. 85, Federal Question (Dec. 1, 1980, P.L. 96-486, § 2(a), 94 Stat. 2369.) which states:

"The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States."

Title 28 U.S.C. § 1361, District Courts; Jurisdiction, Ch. 85 Action To Compel An Officer Of The United States To Perform His Duty, (Oct. 5, 1962, P.L. 87-748, § 1(a), 76 Stat. 744.) which states:

"The district courts shall have original jurisdiction in any action in the nature of mandamus to compel an officer or employee of the United States or any agency thereof to perform a duty owed to the plaintiff."

Title 28 U.S.C. § 1861, Procedure, Ch. 121 Juries; Trial By Jury, Declaration Of Policy (Mar. 27, 1968, P.L. 90-274, § 101, 82 Stat. 54.) which states in part:

"It is the policy of the United States that all litigants in Federal Courts entitled to trial by jury shall have the right to grand and petit juries..."

# CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Title 28 U.S.C. § 1915 (e)(2)(B)(i), Procedure, Ch. 123 Fees And Costs, Proceedings:  
in forma pauperis, (May 2, 1996, P.L. 104-140, Title 1, § 1(a), 110 Stat. 1327.) which

States:

Notwithstanding any filing fee, or any portion thereof, that may have been paid, the court shall dismiss the case at any time if the court determines that - the action or appeal - fails to state a claim on which relief may be granted."

Title 28 U.S.C. § 1915 (e)(1), Procedure, Ch. 123 Fees And Costs, Proceedings  
in forma pauperis, (May 2, 1996, P.L. 104-140, Title 1, § 1(a), 110 Stat. 1327.) which

States:

"The court may request an attorney to represent any person unable to afford counsel."

Title 28 U.S.C. § 2284(a), Procedure, Ch. 155 Jurisdiction, Three Judge Courts, Three  
Judge Court, When Required, Composition, Procedure, (Nov. 8, 1984, P.L. 98-620,

Title 14, § 402 (2a) (E), 98 Stat. 3359.), which states:

"A district court of three judges shall be convened when otherwise required by Act of Congress..."

Title 42 U.S.C. § 1983, Public Health And Welfare, Ch. 21 Civil Rights, Civil Action  
For Deprivation of Rights, (Oct. 19, 1996, P.L. 104-317, Title III, § 309(c), 110 Stat.

3853.) which states in relevant part:

"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..."

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

" Party injured in an action at law, suit in equity, or other proper Proceedings for redress ... "

Title 42 U.S.C. § 1985 (3), Public Health And Welfare, Ch. 21 Civil Rights, Conspiracy To Interfere With Civil Rights, (R.S. § 1980, April 20, 1871, C. 22, § 2, 17 Stat. 13.)  
Which states in relevant part :

" If two or more persons in any State or Territory conspire or go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; ... in any case of conspiracy set forth in this Section, if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators. "

Title 42 U.S.C. § 1986, Public Health And Welfare, Ch. 21 Civil Rights, Action For Neglect To Prevent, (R.S. § 1981, April 20, 1871, C. 22, § 6, 17 Stat. 13.)  
Which states in relevant part :

" Every person who, having knowledge that any of the wrongs conspired to be done, and mentioned in Section 1985 of this title, are about to be committed, and having power to prevent or aid in preventing the ... "

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

"Commission of the same, neglects or refuses to do, if such wrongful act be committed, shall be liable to the party injured, or his legal representatives, for all damages caused by such wrongful act, which such person by reasonable diligence could have prevented; and such damages may be recovered in an action on the case; and any number of persons guilty of such wrongful neglect or refusal may be joined as defendants in the action..."

## STATEMENT OF THE CASE

This is a case of an American Citizen, who is a victim of Racketeering Activities Committed by State and Federal Agents in a Conspiracy to deprive him of Federally Protected Rights and Privileges, blowing the whistle on Public Corruption.

Petitioner, Stephen Daniel Leonard, the victim in this case, filed Civil R.I.C.O., and, Civil and Criminal Claims against the respondents / defendants after respondents entered into George Washington University Hospital, colluded with G.W.U. Police and G.W.U.H. employees to impede and/or deny Petitioner the benefits, services, and privileges of the Emergency Room care and treatment, while Petitioner, participating in D.C. Medicaid, attempted to obtain Emergency Care for Cardiac arrest / Heart Attack symptoms, in violation of Amendment XIV, U.S.C.A. and Title 18 § 4, § 241, § 242, § 245, § 371, § 1962(c), § 1964(c), § 1963, and Title 42 § 1983, § 1985(3), and § 1986; Rotella v. Wood, 528 U.S. 549, 557-558 (2000) "The object of civil rICO is thus not merely to compensate victims but to turn them into prosecutors, 'private attorneys general', dedicated to eliminating racketeering activity". Klehs v. A.O. Smith Corp., 521 U.S. 179, 187 (1997); Agency Holding Corp. v. Malley-Duff & Associates, Inc., 483 U.S. 183 (1987).

Petitioner, whom has been actively litigating the Civil R.I.C.O. Case in the State, Federal and International Courts and Agencies since 2001 is known by the defendant's / Respondent's and disliked by the law enforcement officials and politicians who are subjects of petitioner's complaints, which led to these "retaliatory acts" by the F.B.I. and D.C. Metropolitan Police

## STATEMENT OF THE CASE

Department and other defendants / respondents, in violation of Title 18 § 4, § 241, § 242, § 245, § 371, § 1512, § 1513, § 1962(c), § 1963, § 1964(c), Title 42 § 1983, § 1985(3), § 1986, Amendment XIV, U.S.C.A. and Articles 1, 2, 3, 5, 6, 7, 8, 9, 12, 13, 14, 19, 28, and 30 of the U.D.H.R.

Petitioner's Pickup truck was broken into by law enforcement authorities while Petitioner was registered as a patient at G.W.U.H. and inside the emergency room. G.W.U.H. employees and G.W.U. Police delayed, impeded and/or denied Petitioner health care and access to health care services due to their collusion with the F.B.I., D.C.M.P.D. When Petitioner learned of their actions Petitioner made complaints to law enforcement and G.W.U.H. administrators. Petitioner requested the video feeds from the G.W.U.H. E.R. and the G.W.U. Campus Police and then proceeded to the D.C.M.P.D. Headquarters to file a formal Internal Affairs Complaint. Upon arriving at D.C.M.P.D. HQ. the duty officer refused to allow Petitioner to speak to I.A. or any supervisors to take the report, but rather informed Petitioner to make the Complaint "at Second district office", in violation of 42 § 1986, 18 § 4, § 242, § 241, § 371, § 1512, § 1513, § 1962(c), § 1963, § 1964(c), 42 § 1983, § 1985(3), Amendment XIV, U.S.C.A., and Articles 1, 2, 3, 5, 6, 7, 8, 9, 10, 12, 13, 14, 19, 28, and 30 of the U.D.H.R.

While Petitioner was driving to the Second district office, Petitioner suffered severe cardiac arrest / Heart attack symptoms and sought help from the Capitol Police on Post at Constitution Ave and about Second Street. The Capitol Police contacted an ambulance who took Petitioner to

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Georgetown University Hospital at G.U. Main Campus, then impounded Petitioner's security dog and pickup truck. Upon arriving at G.U. Hospital (G.U.H.) D.C.M.P.D. was escorting the ambulance. When Petitioner was brought into the E.R. G.U.H. Medical Staff refused to treat Petitioner and left him on the gurney without any medical care for about 45 minutes. Petitioner then left the E.R. to seek help from neighbors to get to a telephone to call for help. Police and Ambulance chased the Petitioner to Resistor Road, arrested Petitioner and unlawfully took Petitioner to a Psychiatric Hospital. Upon arrival Police and Hospital officials injected Petitioner with an unknown chemical in a syringe took the handcuffs off and placed Petitioner in an observation room against Petitioner's requests, pleas and grievances, in violation of 18 § 4, § 241, § 242, § 245, § 371, § 1512, § 1513, § 1962(c), § 1963, § 1964(c), 42 § 1983, § 1985(3), § 1986, Amendment IV, and XIV, U.S.C.A. and Articles 1, 2, 3, 5, 6, 7, 8, 9, 10, 12, 13, 14, 19, 28, and 30 of the U.D.H.R.

The following morning Petitioner was released from the Psychiatric Hospital with an alleged diagnosis of anxiety. After Petitioner walked outside Petitioner collapsed and woke up in George Washington University Hospital. After waking Petitioner left the Hospital due to the previous night's events and attempted to seek medical care in multiple area Hospital E.R.'s in D.C., Va. area. While attempting to seek medical help, Petitioner was stalked and harassed by unknown at this time people in a black car which followed then chased Petitioner around N.W.-D.C. Petitioner ran into Georgetown University Law School Library and

## STATEMENT OF THE CASE

requested help. No help was rendered and Petitioner ran to the United States Attorneys Office and F.B.I. Field Office on Judiciary Square to seek help. Again No help was rendered. Petitioner then ran into the Church to seek help and shelter to hide, where Petitioner hid overnight.

The following morning Petitioner contacted Church members for help. The Pastor arrived and contacted D.C.M.P.D. D.C.M.P.D. contacted an ambulance and had Petitioner transported to Georgetown University Medstar Hospital off Capitol St. N.W. The Medical staff at G.U.M.H. refused to assist Petitioner. Petitioner then drove to Johns Hopkins in Baltimore. Johns Hopkins refused to help Petitioner and Petitioner drove to Glen Burnie, Md. to seek help from the Baltimore/Washington Hospital and local lawyers in Glen Burnie, Md.

The following Monday Petitioner attempted to retain lawyers to prosecute the defendant's and secure medical assistance. The lawyer's declined and the Petitioner then left to the United Nations Headquarters in Manhattan, N.Y. to file the Complaints Petitioner has exhausted in the United States of America under the Corresponding International Treaties, and seek Asylum.

While in route to N.Y. Petitioner's truck broke down in Glen Burnie Md. Petitioner then commandeered a Semi-truck and fled Md. to seek Asylum and Petition the United Nations to hold the United States accountable for violations of domestic and International laws.

# STATEMENT OF THE CASE

Petitioner was chased from Wd. to N.Y.C. along I-95. Petitioner did not stop until reaching the U.I.D. Hq. building and ran inside. Petitioner was denied access due to hours of operation being over and fled to the Church of the U.I. across the street and dropped off a complaint with the Human Rights office. After dropping the complaint off with U.I. Church officials Petitioner drove to the N.Y. Port Authority Police at Lincoln Tunnel and turned in the vehicle to Police authorities, and requested medical help. N.Y.P.D. Police arrested Petitioner and charged him with various crimes including taking a vehicle without permission. Petitioner was then placed into Balvue Psychiatric Hospital for 72 hours, then taken to Rikers Island County Jail.

Petitioner was released from custody after 58 days incarceration. Upon being released Petitioner immediately contacted the Capitol Police about his security dog. The Capitol Police gave Petitioner the D.C. Animal Shelter's contact info. Petitioner then contacted the Animal Shelter whom informed Petitioner that "the dog died". Petitioner then requested the remains for a proper burial and was denied. Petitioner then filed a complaint with supervisors at the Animal Shelter whom then claimed that the dog was euthanized and buried "on an apple farm in Virginia".

Petitioner then contacted Glen Burnie P.D. about his truck, and its location. The truck was not located. Petitioner filed a stolen

### STATEMENT OF THE CASE

Vehicle Report over the telephone with Glen Bursick, M.D. P.D. About two days later the Glen Bursick, P.D. located Petitioner's vehicle, and impounded it. When Petitioner contacted the Police impound about the vehicle Petitioner was told that the vehicle was released to "last warning".

Petitioner then filed a Federal Case in the N.Y. S.D. Court under Civil R.I.C.O. / Civil Rights Violations against all parties involved. Petitioner then fled the United States into Canada via the Buffalo-Erie Railroad bridge to seek asylum at the Swiss Consulate in Oakville, Ontario Canada. After crossing into Canada, Petitioner contacted the Canadian Secret Intelligence Service and informed the Canadian government of Petitioner's actions of crossing into Canada to seek asylum (Art. 14. U.D.H.R.) the reasons why Petitioner fled the United States for asylum, the current location, route and destination Petitioner was in and going to and complete physical description in case of identification needs.

After two days walking, Petitioner was arrested at the Burlington Bridge on Queen Anne's Highway by the Ontario Province Police. Petitioner requested asylum. Petitioner was taken to Niagara Falls County Jail in Canada pending immigration review. After three weeks Canada denied Petitioner's asylum requests and deported the Petitioner back to the United States regardless of Petitioner's fear of past, present and future persecutions.

Petitioner then attempted to flee the United States again in Key West, FL

# STATEMENT OF THE CASE

On Sept. 17, 2015 which led to an international incident upon the High Seas 40 plus miles south of the United States between Petitioner and Federal Agents. Subsequently, as a result of the international incident, Petitioner was brought back to the United States of America, persecuted, and denied asylum.

In August 2016 Petitioner filed this case in the U.S. Dist. Ct. in Miami, FL. for Civil R.I.C.O. and Civil Rights Violations. The U.S. Dist. Ct. in Miami, FL. transferred the case to the U.S. Dist. Ct. in Washington, D.C. The U.S. Dist. Ct. allowed the case to proceed.

The defendants moved for summary judgment alleging failure to state a claim, and Petitioner responded and replied to all of defendants motions. Petitioner moved for an appointment of Counsel. The U.S. District Court Judge denied Petitioner counsel, abusing its discretion in doing so, made arguments up on behalf of the defendants then ruled on its own made up arguments granting summary judgment, denying Petitioner justice, fair hearing, and a trial and dismissing the case. Petitioner timely appealed the Dist. Ct. orders as manifest injustice, judicial misconduct, judicial vindictiveness, and violations of Petitioner's rights to Due Process. Article VI, U.S.C.A.

The U.S. Dist. Court of App. for D.C. Kavanaugh, Wilkins and Katsas, Circuit Judges heard and denied Petitioner's case denying Petitioner Counsel and granting defendants/appellees motions for summary judgment. Petitioner moved for a Panel Rehearing under Rule 40 Fed. R. App. The Panel consisted of two Circuit Judges.

## STATEMENT OF THE CASE

Wilkins and Kertsas, a third Circuit Judge did not participate. The D.C. Circuit's explanation for this was quote "Then Judge, now Justice Kavanaugh was a member of the panel that originally heard this appeal. He took no part in the disposition of the rehearing petition. Petitioner claims that the three judge panel should have been afforded under Article III, U.S.C.A. and Amendment XIV, U.S.C.A., Title 28 § 2284(a), Title 42 § 1983 and Articles 1, 2, 3, 5, 6, 7, 8, 9, 10, 12, 13, 14, 19, 28, and 30 of the U.D.H.R.

On October 17, 2018 the U.S. Dist. Ct. of App. for D.C. Circuit violated the Petitioner's rights to hear this controversy, to have a jury trial, to afford Petitioner a grand jury in order to charge these defendant's with the Criminal Charges of their crimes committed and the equal protections of the laws.

This Petition for Certiorari ensues.

## REASONS FOR GRANTING THE PETITION

1. The Policy of the United States is to afford all litigants in Federal Courts to a trial by jury and to grand and petit juries. (28 § 1861); Marbury v. Madison, 5 U.S. (1 Cranch) 137 (1803).
2. The United States Court of Appeals for the District of Columbia Circuit violated Petitioner's rights to appellate review under fair hearings; Naing Tun v. Gonzales, 485 F.3d 1014 (2007, CA8) Clause of due process right.
3. The United States Court of Appeals for the District of Columbia Circuit violated Petitioner's right to fair hearings; Streckland v. Washington, 466 U.S. 668 (1984) Clause of due process right to Counsel under 28 § 1915 (e)(1), Amend XIV, U.S.C.A. when denying Petitioner's Motion for Counsel.
4. The United States Court of Appeals for the District of Columbia Circuit violated Petitioner's right to fair hearings; Chaplin's Realty Assocs. v. Tikoian, 989 A2d 427 (2010 RI); Wang v. Holder, 569 F.3d 531 (5th Cir. 2009) when failing to review the facts that trial Court judge acted with vindictiveness, made arguments on defendant's behalf then ruled on defendant's behalf dismissing the Complaint on his own arguments.
5. The United States Court of Appeals for the District of Columbia Circuit violated Petitioner's Human Rights under Articles 1, 2, 3, 5, 6, 7, 8, 9, 10, 12, 13, 14, 19, 28 and 30 by failing to reach any determination on the Constitutional Claims on appeal which in effect denied Petition domestic Constitutional, Equal Protection of the laws and international protection of treaties. Russel War Crimes Tribunal (Stockholm 1967).

## REASONS FOR GRANTING THE PETITION

6. The United States Court of Appeals for the District of Columbia Circuit failed to afford Petitioner a three judge panel under Rule 40 Fed.R. APP. when reviewing petition for Panel rehearing in violation of Art. III §2 U.S.C.A.
7. Petitioner is entitled to his day in Court to hold respondents accountable for their crimes Civil and Criminal. Rotella v. Wood, 528 U.S. 549, 557-58 (2000).
8. Petitioner's case is about accountability in America. This is a case of an American citizen who is a victim of Racketeering Activities. These crimes were committed by State and Federal authorities and lay citizens whom colluded with them. Petitioner spent about fourteen years (2001-2015) investigating and exposing Public Corruption, Racketeering activities, illegal intelligence activities, War crimes, torture, genocide, murder and other crimes against humanity committed by this government's officials in the name of their Political agendas. The events that led up to 9-11-2001 and the events that resulted thereafter were all perpetuated on lies. Lies about the people responsible, lies about W.M.D.'s, lies about war. These lies were circumvented by the U.S. Government to invoke power to declare war under Title 50 § 1541(c)(3) when this Government was engaged in illegal war in Afghanistan since 2000. Since 9-11-2001 this government used lies to occupy Iraq and Afghanistan, Confiscate their Oil fields and torture and kill anyone who stands in their way.

## REASONS FOR GRANTING THE PETITION

In 2003, Paul Bremer, the C.I.A., D.O.D., State Dept. and the White House developed and implemented a plan to commit genocide in Iraq killing all of the Baathist Party Iraqis. This was called the "de-Baathification Policy" ideated by then President G.W. Bush, Vice President R.B. Cheney and dozens of others in this government.

Petitioner exposed these officials beginning in Nov. 2002. See 02-CV-23268 (Leonard v. U.S.A.D., et. al.), 03-CV-20980 (Leonard v. Bush, et. al.) U.S. Dist. Ct. Miami, FL. In 2004 the F.B.I. and U.S. Secret Service arrested Petitioner at the Broward County Courthouse while Petitioner was fighting false allegations in a custody case for his two children, under the false allegation Petitioner was "a terrorist". Petitioner was released after hours of interrogation when Petitioner successfully proven the cases Petitioner filed were Civil R.I.C.O. Civil Rights Cases for Corruption, Conspiracy and Racketeering related activities, and the Neglect of Duty to prevent those crimes from occurring after notification. Petitioner's entire life was systematically and methodically destroyed by F.B.I., and various officials of the U.S. Government thereafter. Retaliation. Petitioner lost his children due to the severity of those false malicious allegations.

Beginning in 2001 and since Petitioner has repeatedly moved this government for redress of grievances for Racketeering activities, Conspiracy, Corruption and violations of laws and treaties. These petitions have fallen on deaf ears. For the most part, the United States Courts have censured Petitioner, and the United States Government has tampered with, retaliated against and lied about Petitioner in effort

## REASONS FOR GRANTING THE PETITION

to Cover up their Crimes.

This is a Case about justice being administered to the tyrannical Government of the United States of America. A Government who has violated the rights of the people in the States, Territories, Possessions, Commonwealths and Districts, in every town, every City and every County of every State of the United States.

It's a Case for Checks and Balances to be applied to State and Federal Politicians and Public officials. It's a Case for Punishments to be administered for these guilty officials for their Racketeering Crimes, or the Conspiratorial Crimes, and Crimes against humanity.

It's a Case for redemption, freedom and hope, for Petitioners and almost 400 million American citizens whom are at this moment, without a good government to protect our rights, privileges, immunities and defend the Constitution, Bill of Rights, Laws and Treaties made.

It is a Case for equality, equal protection of the laws for all of our people and our rights to be free from governmental intrusion into our private lives without probable or justifiable cause. Free from excessive, unwarranted and unreasonable taxations, and most importantly... free from arbitrary judicial proceedings.

For all of the above reasons, this Petition should be granted.

Patrick Henry once stated "Give us Liberty or Give us Death" (1775)

## CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Stephen D. Leonard, Prose  
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Date: November, 2018