18-8817 ORIGINAL

**In the Supreme Court of the United States**



MICHAEL CLARK,

*Petitioner,*

v.

**INDEX NO.**

NORTHERN DISTRICT OF NEW YORK,

*Respondents,*

**On Writ of Certiorari to the United States Court of Appeals for the Second Circuit**

# BRIEF FOR THE PETITIONER

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*Petitioner Pro-se Michael Clark*

# QUESTIONS PRESENTED

1. Did the Northern District and Second Circuit Courts violated the Clark Family First Amendment and Common Law Rights related to the two fraudulent court orders of 8/26/05 and 7/13/02 under *Nixon v. Warner Communications, Inc,* 435 U.S. 589 (1978) and did those Judges, as well as the State Judges, rule in favor of "usurped authorities" in violation of subject-matter jurisdiction, in violation of *Bradley v. Fisher,* 80 U.S. 13 Wall, 335 (1871) and do those judges have Judicial Immunity when they ruled in favor of those "usurped authorities" and should criteria be established related to that violation.

2. Did the Judges of the Second Circuit and the Northern District violate the Federal Rules and Procedures and "Color of Law" related to inserting county attorney's to represent state court's in the petitioner's docket and conspire with the NY State Attorney General's related to those docket entries in violation of federalism and comity, and should rules related to that practice be made. Did Judge McAvoy violate the *Rules Enabling Act* 28 U.S.C. § 2072 in relation to discovery and did the Second Circuit use those rules violations to deny the right to appeal.

# RULE 24.1(b) STATEMENT

Pursuant to Supreme Court rule 24(b) the petitioner Michael Clark, is listed in the Caption. The remaining parties that are part of the Northern District's filing appealed from have been omitted and the Second Circuit Court has violated the rules to my filing and refuse to list the parties and will not list them, striking my filing, claiming it was defective, and was never given due notice, and never explaining why it was defective, a violation of notice. This is why it came to be a violation of normal practice.

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# BRIEF FOR THE PETITIONER

## OPINIONS BELOW

The opinion of the Court of the Appeals was made on January 9, 2019, never sent to the petitioner and only through this court sending me the docket, which I received until January 26, 2019, did I become aware of that decision. Then after never receiving the order and calling this court, which made me call them, did I received that decision(3/6/19). Then upon reading the docket sent by that court, discovered that the corrupt 2nd Circuit had made a additional order, Docket # 24, claiming that a certified copy of the order had been sent to me, which it was not, further proof of that court's unlawful action. Docket # 18-3040

## JURISTICTION

The judgment of the Court of Appeals was entered on January 9, 2019. Pet. App 2A. No rehearing related to the untruth claim that due notice was given to petitioner. Pet. App. 3A. The petition was originally filed on January 9, 2019, when corrections were requested. This court's jurisdiction rests on 28 U.S.C. 1254(1)

# STATUTORY PROVISIONS INVOLVED

Article IV, Section 1 of the United States Constitution, known as the "Full Faith and Credit Clause, the abstract from the constitution states this: " In pursuance of the powers vested in it, Congress has proscribed the mode of authentication and the effects of such acts records, and judicial proceedings as follows: and said records, acts, and judicial proceedings so authenticated shall have such faith and credit given to them in every court within the United States as they have by law or usage in the courts of the state from which they are taken.

18 U.S.C. §242, states in part:

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. . .

45 C.F.R 303.35 states:

(a) Each state must have in place an administrative complaint procedure, defined by the State, in place to allow individuals the opportunity to request an administrative review, and take appropriate action when is evidence that an error has occurred or an action should have been taken on their case. This includes both individuals in the State an individuals from other states.

# STATEMENT

This matter is brought into your court, and this appeal is sought from the 2nd Circuit Court of Appeals, the basis for federal jurisdiction is the Northern District of New York Court, a court of first instance. The federal issues were raised in 2011 in State Court and the Northern District Court has been "oppressing", that the Schenectady County Family Court and it's County, have no subject-matter jurisdiction on my case, and that all decisions made since 2005, by the State and Federal Courts, are based on those fraudulent orders, and therefore are void and invalid. That means that all action by the Article III courts are not legitimate decisions, refusing to acknowledge the truth and render justice. The Federal Courts refuse to acknowledge that my amended divorce, is the legal controlling order, made by a court of competent jurisdiction on 4/14/03 in Fulton County Supreme Court, and all decisions by the Family Court are not made by a court of competent jurisdiction, and the stipulation of 1/23/03, which is the basis of violations of law by both state and federal courts, that matter appears in the Federal Bankruptcy Action, 02-17972, Kathleen Clark. Those matters were entered onto the federal record, Case 6:13-cv-00799-TJM-DEP, Document 71-3. The federal questions were timely raised on September 27,2018, Order Judgment was dated 10/2/2018, Notice of Appeal was made on 10/12/2018, order made on 1/09/2019, and the Docket Number in the 2nd Circuit is 18-3040, making the federal questions timely raised and this Court ha s jurisdiction to review the judgment on a writ of certorari

# SUMMARY OF AGRUMENTS

The arguments in this case have already been thoroughly made, at both levels of federal courts and are in reality, quite simple. The federal judges have violated Full, Faith, and Credit since 2012 and also allowed the initial federal filing, the bankruptcy filing of 2003, which made me amend my divorce, then violated that decree related to the required clearing of my debt, and that violation still has a

negative impact on my life, creating credit discrimination and creating the issue of the theft of my money, based on the date of the stipulation amending that divorce, 1/23/03, that ties the state and federal action together. Those issues have been "oppressed" by both the State and Federal Courts and it created the issues of Judicial immunity, First Amendment retaliation, and the Federal Rules violations, especially related to docket practice, that binds the state attorney general and the federal judges, essentially removing sovereign immunity, from the equation. Then controlling law made by your court in 2017 and the denial of administrative review, proven in the Unified Court System, by both the State Agency and Federal Agency, concerning illegal conduct, that is still ongoing.

## ARGUMENT 1

## DID THE JUDGES OF THE NORTHERN DISTRICT AND SECOND CIRCUIT ALLOW THE FRAUDULENT ORDERS AND AUDITS TO REMAIN ON THE CLARK FAMILY RECORD IN VIOLATION OF THE 5TH AMENDMENT.

In 2012, I had proven the first court order 8/26/05, did not exist and the Fulton County Supreme Court would not correct the matter, it forced me into federal court to ask for an injunction correcting that unlawful action. The case concerned my right to access judicial records under *Nixon v. Warner Communication, Inc.*, 435 U.S. 589 (1978). In my filing were the State Courts and the State Agency, NYS OTDA, and two counties. The federal court action 6:12-cv-0745, was answered by Magistrate Dancks, denying me, but citing the fraudulent order involved. "Fraud vitiates the most solemn contracts, documents, and even judgments." *U.S. v. Throckmorton,* 98 U.S. 61,64 (1878). Then I appealed to Federal Judge Hurd, citing *Mathews v. Elridge*, 424 U.S. 319, 335 (1976) and he denied me

also. I had previously filed papers with the NYS Court of Appeals in fall 2011, one was the "Writ of Errors" which documented the two decisions made by the 3rd Appellate are not based on trial record, defaming me, attempting to protect the Family Court Judge, who I had caught using the bench to commit a felony, which I can prove to any reasonable jury in America. I had an appeal pending in the 3rd App. and filed my "Writ of Mandamus" in the 2nd Circuit, 12-3368, which created unlawful action by the circuit judges, which forced me to refile and sent me the Docket on 12/07/12 with "county attorneys" to represent state courts, in conflict with the September 19, 2012 letter entered by the NYS Attorney General. The proof of that is located on the federal record, Case 6;13-cv-00799-TJM-DEP Document 78-1, Pages 4, 13, 14. Already the federal judges had allowed three "usurped authorities" Schenectady County, Schenectady County Family Court and the NYS OTDA, all were guilty of an illegal garnishment to continue that ongoing action, which is going on to this day. Then I wrote a letter to the court asking them for the fraudulent action to be corrected, they refused to do that and knowing that I could not get a fair appeal, I aborted the action. Also, another significant action had transpired in that filing. On December 20, 2012, the 3rd Appellate Court has made their decision defaming me, claiming I needed a lawyer, and reversed the Family Court decision, leading to allowing another fraudulent audit to be entered into court. In the family court session, I had made a request to allow me to make a motion about subject-matter jurisdiction, which was "oppressed" by the 3rd Appellate and I was denied a right to appeal it. Then after receiving the decision telling them to produce the court order of 8/26/05 or I would not go to court. This was the exact same issue that was in front of the 2nd Circuit I was under their jurisdiction at time and had served the writ on the 3rd Appellate. This brought in the Direct-Interest Statute, *Aetna Life Ins. Co. v. Lavoie,* 475 U.S. 813 (1986). I had previously caught the Judge, whose decision and they reversed, removing documents from my files ( NY Penal Law 215.40), the Unified Court System had sent me to an Inspector General, who had taken my transcripts that are extremely damaging, proving that the Judge should have been recused, which had gone to the 3rd

Appellate, who had covered it up. Then they had allowed him to forced me to trial in 2010, had entered the termination notice of 4/14/03 in court, was also entered in my first appeal, was illegally jailed for sixty days because of that cover-up, and in jail discovered that the had allowed my appeals not to be based on trial record, a violation of the 14th Amendment, and had made two decisions not based on trial record, which I had documented to the NYS Court of Appeals with the "Writ of Errors" and it went in front of that court and they refused to correct that egregious conduct, which is why I filed in federal court. This would all be documented in my next filing. 5 Judges were involved instead of one. This led to the next filing in front of the Northern District, 6:13-cv-00799, documenting the action past the 2007 date, which is where the "Writ of Mandamus" ended. The action after that, outlined in that filing and is so damaging to the Unified Court System, the State and County, anyone that reads it will understand why a investigation into the State Court Action is warranted. I had filed under *in forma pauperis,* waited over six weeks, then raised the filing fee. As soon as I removed my poor person status, Judge Thomas McAvoy, he immediately suspended Rule 16 discovery, related to the fraudulent orders and audits. Then after some of the parties filed motions, in which I responded to, he ruled against me, allowing the fraudulent audits and decisions related to it, to remain on the Clark Family record. He also used *in forma pauperis* as the basis for his filing, instead of Rule 12(6), because he could not used that related to qualify immunity. This led to another appeal 14-417, which brought in other significant issues. First off, Judge McAvoy had, " enlarged and modified " my filing, eliminating Fulton County and Schenectady County Family Court along with two Judges, Assini and Ellis, who both had ordered jail, illegally, because the Schenectady County Family Court is in "absence of all jurisdiction" they both do not have jurisdiction, personal or subject-matter over me. Then the NYS Attorney General's John Hitsous writes a letter to the 2nd Circuit requesting removal of them from my appeal because of Judge McAvoy's violation of docket practice. I oppose the action and the 2nd Circuit ignores my request and terminated those parties. Previously in 12-3368 they had terminated the 3rd Appellate and

the NYS Court of Appeals without any legal right. They are trying to make my filing a county issue instead of a state issue, protecting the public corruption of the Unified Court System related to Judicial Accountability. Then Attorney Hitsous files a Notice of Appearance and eliminates the two courts and two Judges on that Notice, essentially claiming he doesn't represent them. The 2nd Circuit again lists Fulton County Supreme Court and Schenectady County as being represented by county attorney's, as in the previous appeal, which is in conflict with the attorney general's filing. The court's action is in violation of the rules and in reality cannot be considered as "judicial acts". That action is fraudulent in nature and not a proper function of Judges. Then I file a "Right to Read Letter" with the courts. If I can't read a court order then how can I make a legal argument against, if I do not know what it says. This also brings in the issues of notice, hearing, and appeal about that court order. Then the 2nd Circuit dismissed my appeal citing *Neitzke v. Williams,* 490 U.S. 319, 325 (1989) claiming my filing " lacks an arguable basis in law or in fact " which they knew was untruthful and in fact was oppression of the legal issues. Oppression is not a judicial act. Next after realizing that the other court order, which the corrupt Judge Powers said in his decisions gave him the right to illegally confirm the decisions of the support magistrate and the other judge, who I had made recuse herself, that I have never seen it and made an appointment with the Schenectady County Family Court and it's Support Collection Unit to look for it, sure enough no court order in both case files. This led to a Rule 60 motion in which I entered 233 pages of highly damaging evidence to all parties, and it was filed asking for Judicial Notice of the Adjudicating Facts. Once again Judge McAvoy used the distorted conception of law, ignoring and oppressing the issue of subject-matter jurisdiction, which I addressed, citing the 2nd Circuit's decision and citing no known controlling law. Once again I appealed, 15-328, and also filed for Freedom of Information concerning the court orders and transcripts that the state had denied me. Again county attorneys were inserted, and this time NYS Attorney General's Hitsous files a April 3, 2015 letter, claiming his office does not represent Fulton County Supreme Court, Case 6:13-cv-00799,

Document 78-1, Filed 7/30/15, Page 42 of 44. The Federal Judges are working with the state, a party to the action, against me in violation of federalism and comity, also not a judicial act. Next I file the Request for a Grand Jury, entering proof of the conflict of the county attorneys, 44 pages of evidence, asking the Albany NY Department of Justice to do an investigation into the "color of law", 28 U.S.C.§ 242, violations by the Federal and State Judges. Once again, Judge McAvoy uses the distorted conception method, claiming it's a letter, when it was a court filing. The Albany office calls me and tells me they would not do a grand jury. It was also sent to the New York City and Washington D.C. Offices, which must have that evidence I entered. This allows me to file another Federal summons and complaint, bringing in the Federal Judges into my lawsuit. That lawsuit. 1:16-cv-740, goes in front of Federal Judge Brenda Sannes and Federal Magistrate Christian Hummel. Then I file numerous letters concerning the violations by the State Judges who now are using a variety of unconstitutional state rules and statutes against me, and also file a Freedom of Information filing, requesting the names of the Judges of the 2nd Circuit who were involved with File 12-3368, responsible for the county attorney issue, because federal courts are suppose to be open courts. Next I get a friend to buy the transcript of June 28, 2012 in Fulton County Supreme Court, which was while my filing under Judge Hurd was pending. I entered it into federal court as evidence. This create two major problems for the Judges, especially Judge McAvoy, who had used the *Rooker-Feldmen doctrine,* against me, and it also verified the theft of my $2587 from 2003 by the state, that related to the bankruptcy action and the date 1/23/03. The *Rooker-Feldmen doctrine,* is used inappropriately by federal judges, especially related to family courts issue, where it should never be used because they are courts of limit jurisdiction. Judge McAvoy denies my request, for Foil, and I am suing him in this filing, a clear violation, he is suppose to recuse himself, 28 U.S.C. § 455, which he completely ignores . Then Chief Judge Glenn Suddaby strikes the filing, attempting to conceal the proof of Judge McAvoy's wrongful conduct related to my filing. He also stated in Docket # 88, one of the most foolish mistakes ever made by a Federal Chief Judge. He

admits that I want the court to address the issue of subject-matter jurisdiction related to the child support issue. This is absolute proof of oppression that cannot be refuted. I file a Notice of Appeal against Judge McAvoy and the 2nd Circuit accepts, Docket 16-3927. Then Magistrate Hummel rules against me, I file the appeal to District Judge Sannes, and enter the "Writ of Mandamus" from 12-3368. She rules against me, denies me mandamus, and asks for a sanction from the Chief Judge. I received that and file the order to show cause, which he rejects. This is first amendment retaliation against my "opportunity to be heard", which is proven by Docket # 88. I file a Notice of Appeal, 16-3941 for her and one for him, 16-4332. Then after the appeal is accepted, I filed a compliant related to my wife and children, my next friends, who were denied illegally by Judge Sannes. The 2nd Circuit agrees and allows them to appeal, giving them all separate appeals, so that I would have five appeals to write within a short period of time. On March 8, 2017, I enter my brief, addressing the issue of recusal of Judge Powers, related to his felony conduct and the State Court covering up that, and address the issue of Judge McAvoy violating the *Rules Enabling Act,* 28 U.S.C. § 2072, related to discovery. The 2nd Circuit dismisses it on the same day because it implicates them in wrongful conduct, denying me my right to an appeal decision on those matters. The Federal rules established related to conduct by the circuit court are thrown in the trash. Then they also dismiss my sons appeals. Then your court makes a significant decision that if that appeal wasn't dismissed, they could not of dismissed it. In April 2017, your court made the decision, *Nelson v. Colorado,* 137 S.Ct. 1249, stating that a state cannot take money that is not theirs. That brings in the matter of the $2587, taken from me in 2003, illegally, admitted by the Unified Court System on the June 28, 2012 transcript, stricken by Judge Suddaby, and now controlling law, that Judge McAvoy mentioned in his Rule 60 decision, and still never returned to me to this day. After that, I become homeless in January 2017 ,because of the federal court's violations, and move to Albany, NY to settle the matter. The State Court refuses to settle, the issue of Judicial Accountability of the Unified Court System, must be addressed by the Court and Congress also. I get

illegally jailed again related to the conduct of NYS, because one of the usurped authorities, NYS OTDA, has me arrested because they refuse to grant me administrative review, getting a order of protection against me, a reflection on the Governor of the state, who that agency speaks for. During my state filings, I am served responses from Schenectady County, who is terminated, and I discover that Judge Hurd had made a decision against me concerning the Foil finding, and it was never sent to me. That was also a violation of 28 U.S.C. § 455, and I file an appeal to the 2nd Circuit about that. They rule against me and are untruthful in their decision, saying I ran out of time, even though I never was notified of the decision. Also, because of the illegal garnishment, I had filed for Social Security Retirement, now federal money is being taken. I request administrative review under 5 U.S.C. § 702 and am denied, which is going to lead to another federal filing. Then I file an complaint online with the with the NYS Court of Appeals about the fraudulent orders. I get a response on September 8, 2017 from Vito Caruso, bringing in the Schenectady County Family Court, who admits that there is "no such orders" exist (Petitioner's Appendix-4A),which verifies that document proves my claims have merit and that I was truthful about everything. I also get the order of protection vacated on January 5, 2018 proving the state agency, OTDA, is in violation of 45 C.F.R. 303.35. This is because the September 2012 letter used to arrest me, proves the state agency doesn't understand law and is fraudulent. To this day the Governor and Commissioner of that agency is still allowing them to send false and fraudulent statements to federal government agencies, and they both are aware of the that truth. I also file a Rule 60 motion to Chief Suddaby, which he oppresses the document of September 8, 2017, which I enter in the filing. He also ignores the federal right under administrative review, as all federal judges have. I also had brought up the issue of fraud that is contained in the interior notes of Rule 60. He rules against me, more oppression, and I file another appeal 18-666. The 2nd Circuit know they are in big trouble because of the September 8, 2017 letter, so they won't send me the required papers to file. I get a letter from the Albany Department of Justice, informing of the appeal number and I go there and file a

complaint about not receiving the papers. Then finally I get the papers with two orders saying my file was defective, when that court knew they did not send me the papers. I write them a letter telling them how they are making orders that are untruthful and what chance do I have to get truthful appeal or a honorable decision Then they refuse to send me the dismissal order, I am only sent the mandate. Trying to prevent me from going into your court. I also had brought up the issue that you can't authenticate those court orders, a violation of Full, Faith, and Credit, send a letter to the NYS Governor and Attorney General asking for authentication, am ignored, and the State Court System will still not correct the matter, as well as the Federal Courts. Then I file my request to remove the Northern District and 2nd Circuit from my filing, am denied again by Chief Judge Suddaby, who needs to be immediately removed from the bench. I file an appeal, 18-3040, enter the papers, weeks later get a packet with a order striking my papers, saying they are defective, want me to refile, but never tells me what is defective, a violation of notice, forcing the issue into your court to be settled.

Now I must address the issue of Judicial Immunity. When that issue was addressed by *Bradley,* it was a needed concept in order for the proper functioning of Article III and other courts in order for proper justice to go forward. It work for years because the moral and ethics of many of the great justices in our history was taken seriously that the standard could be maintained, especially at the federal level. Then apparently in this nation the erosion of the moral and ethics of the justices began, much of it because of the divorce and family court scams that is taking over America, forcing organizations such as FCLU of New Jersey and Parent Alienation Organizations to be formed, because the Family Court System does not work. The legal profession has loss sight of the standards needed to make this judiciary work properly and the erosion has infected the Article III Courts and State Courts, so much that it has spread to the Circuit Court level and the Judges have loss sight of their oaths and responsibility. They have become the "Kings that cannot do no wrong" and used that belief to trash "Judicial Immunity" and thought because that had it, they could do anything they want. It doesn't help

with the "Malicious" right interjected in the equation, when in reality that concept is a clear violation of fundamental fairness or due process. But know we must discuss *Bradley and why all judges involved do not have Judicial Immunity.* "Where there is clearly no authority over the subject-matter any authority exercised is a usurped authority, and for the the exercise of such authority, when the want of jurisdiction is known to the Judge, no excuse is permissible" *Bradley v. Fisher,* 80 U.S. 13 Wall 335, 352 (1871). So when that decision was made and they said "any authority exercised is a usurped authority" they are referring to in my case to the three authorities. So when they said "when the want of jurisdiction is known to the Judge" they are not just referring to a Judge, whose court has no jurisdiction, they are referring to any Judge I bring that up to, because if you allow those usurped authorities to continue their illegal conduct, as they have in my case, you are not rendering justice and "no excuse is permissible" for allowing that conduct to continue. It is quite apparent that the federal courts lost sight of that and then instead of correcting the serious issue of Judicial Accountability of the Unified Court System ,which had wrongful guidance from Chief Judge Jonathan Lippman and his co-conspirator 3rd Appellate's Thomas Mercure, instead allowed the "color of law" violations to continue. That defies our constitutional intent and it's guarantees related to justice and erodes are whole system of justice. When I filed my first brief 12-3368, I cited *Mathews v. Elridge,* 424 U.S. 319, 332 (1976), which stated: Procedural due process imposes constraints on governmental decision's which deprives individuals "Liberty" and "Property" within the meaning of the Due Process Clause of the Fifth and Fourteenth Amendment." When the Justices of that Court, who had a high degree of dignity and honor, made that decision they understood that it was very important to protect people's rights, something many courts had lost sight of, using procedural decisions not to render justice. So when I filed in Federal Court and appealed with the Writ, the Unified Court System and it's corrupt Commission on Judicial Conduct, had covered up and concealed a Judge, who I had caught removing documents from my files, the Stipulation dated 1/23/03, who then made the court sessions ex-parte sessions, so that my

ex-wife who had signed that document with me to amend our divorce, related to going into federal court, would not be there. They knew that the issue was the Judicial Accountability of that court system, and that Judge is still on the bench, in violation of NYS law. Instead of correcting it, so that proper justice could go forward, they enacted a "scam" putting county attorneys to represent state courts, even after the September 19, 2012 letter had been entered into their court, then used docket practice to attempt to make my filing a county issue instead of a state issue, essentially attempting to alter jurisdiction of my case. These are Circuit Court Judges that did that and now they must answer for that cover up and conspiracy, they included themselves into. Honorable people do not do something like that, and why they thought they could get away with it, is a mystery to me, but they are not going to get away with it.Instead they allowed "Liberty" and "Property" violations under the Fifth Amendment to continue, and are still going on to this day.

## PRAYER FOR RELIEF AND CONCLUSION

Therefore, in conclusion his court must take on the issue of Judicial Immunity and establish criteria so that a situation like this never happens again. Sanctions, fines, incarceration if needed, community service, loss of pension, to ensure that the Article III and State Judges understand that rendering truth and justice and assuring that individual's due process rights are protected. I need my record cleared related to the wrongful decision of the Bankruptcy Court Judge Littlefield, who violation my rights in not clearing my debt as required in the declaratory decree, leaving a judgment on my record of over $18,000 that the federal government is require to clear, along with other debts related. All court decisions made after 8/26/05 by both state and federal need to be vacated and reversed related to the fraudulent court orders used to make them. An investigation into the State of New York Court System by the Department of Justice relate to Judicial Accountability and into the State and County Agencies conduct related to there violations of law, and the return of my money, taken in violation of law by the

NYS OTDA, since January 2003. A public trial with an impartial jury for the state,county, and other entities filing and the same for a separate federal filing. A Grand Jury investigation of State and Federal Judges related to "color of law" violations and order investigation into that matter by the Senate Judiciary Committee. A review of Docket Practices and laws enacted to ensure conduct used against me never happens again, and removal of federal judges who used their positions in violations of their oaths to uphold the constitution. Any appropriate action that this court feels it needs to make, and all and any proper remedies this court feels it is appropriate for proper truth and justice to make the Clark Family whole.

Date: 3/18/2019

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3/19/2019