

18-9784

No. \_\_\_\_\_

Supreme Court, U.S.  
FILED

MAY 15 2019

OFFICE OF THE CLERK

IN THE

SUPREME COURT OF THE UNITED STATES

Antoaneta Iotova, Issak Almaleh PETITIONER  
(Your Name)

Dr. Demisa, Dr. Miller vs. — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Court of Appeals Second Circuit NY  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Antoaneta Iotova-15570104  
(Your Name) Issak Almaleh 15569104  
Metropolitan Detention Center  
(Address)  
P.O. B 329002  
(City, State, Zip Code)  
Brooklyn, NY 11232  
(Phone Number)

**ORIGINAL**

#### QUESTION(S) PRESENTED

Dr. Miller and Dr. Deursa from Metropolitan ~~Detention~~<sup>Correctional</sup> Center, Manhattan, prepared a fraudulent psychiatric report about Iobara without evaluating her and without even see her for more than 5 min, where she refused any meeting with doctors for which she signed a refusal form.

Nevertheless these "doctors" made a report with fraudulent content and even recommended psychotropic medications for a person they didn't examine that is attempted murder. As a result of their report both Petitioners are kept in jail for more than 1 year.

## 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:

Autoaneta Totoro - Petitioner  
Issak Almaleh - Petitioner  
Dr. Demisa, psychologist in MDC,  
Manhattan - Respondent  
Dr. Miller, psychiatrist in MDC,  
Manhattan, Respondent

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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 U.S. Court of Appeals; 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☐ is unpublished.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 B to the petition and is

☐ reported at Southern District of NY; 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☐ is unpublished.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 8<sup>th</sup> of May, 2019

☒ 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: \_\_\_\_\_, 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. § 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

Examination of a patient without consent of the patient was tried to be enforced by MDC institutional doctors. As a result was issued a fraudulent report by them that resulted in incarceration of the Petitioners for a long period of 1 year and more.

The patient signed special forms refusal to meet any doctors, psychologist or psychiatrist but the judge enforced anticonstitutional order to receive a report. The MDC doctors prepared a fraudulent report without any grounds and without exams just to keep the Petitioners in jail.

# STATEMENT OF THE CASE

Dr. Miller and Dr. Demutsa from M.D.C., Metropolitan Correctional Center, Manhattan, prepared fraudulent report for Petitioner Iotova without evaluating her and without any ground.

Petitioner Iotova signed 2 times institutional forms that she refuse any kind of meeting of psycho doctors but they tried to enforce examination by threats and against her will. As a result Iotova was not examined but psychotropic medications were prescribed without exam and the Petitioners continue to stay in jail on the basis of that fraud.



## REASONS FOR GRANTING THE PETITION

There is anticonstitutional attempt to be forced a person to meet with a doctor against his will. When he refused to meet with that doctor the doctor prepares fraudulent report about the Petitioner without any ground. Doctor violated the constitutional rights of the patient and violated the Hippocratic oath from the position of force as officer of a federal prison.

### CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Mr. [Signature] A. Totoro, J. Almalch

Date: 06/05/19