

No. 19-1422

U.S. SUPREME COURT

CLERK OF COURT

Honorable John G. Roberts, Jr.

Chief Justice

NAKISHA JACKSON,

PETITIONER

V.

ROY L. BRUN, Judge; MIKE SPENCE, Caddo Parish Clerk of Court;
1ST JUDICIAL DISTRICT COURT; STATE OF LOUISIANA

AND

KRISTY WILSON, ET AL

RESPONDENTS

No. 19-cv-1006

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA,
HONORABLE JUDGE ELIZABETH FOOTE

CASE No. 19-30828
IN THE UNITED STATES COURT OF APPEALS
FOR THE FIFTH CIRCUIT
UNITED STATES DISTRICT COURT

NO. 20-00238
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

PETITION FOR REHEARING

---NAKISHA JACKSON/ PRO SE
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This petition for rehearing of the order denying a petition for writ of certiorari is based upon **Supreme Court Rule 44.2** and the **fundamental errors committed by the US Fifth Circuit and the Louisiana Western District that cannot be corrected in any other manner than provided by this higher court**. I request the Justices reconsider granting my writ of certiorari with the understanding that this Court initially denied the writ incorrectly believing that I, NaKisha Jackson, had an adequate remedy on appeal or an actual appeal at all. As of today, October 5, 2020, the Fifth Circuit continues to deny my right to an appeal by not allowing a panel of judges to hear my case, and I was denied the record from the Louisiana Western District, which is illegal. The Fifth Circuit clerk illegally closed my **CIVIL RIGHTS COMPLAINT** with the knowledge of errors following these proceedings and will not **re-open/continue** it without higher court direction. I have transmitted all these documents submitted to the US Supreme Clerk to the Fifth Circuit Clerk, in the manner in which they approve of, and the clerk sends me notification each time that they are deemed unfiled documents, even after I paid for this writ. Judge Oldham of the Fifth Circuit acted unilaterally without my consent and has not been held accountable for his judicial errors. These acts constitute errors which violate my federal fundamental rights recognized as "fundamental" by the U.S. Supreme Court. In *Murray*

*v. Carrier*¹, the Supreme Court ruled that the concept of fundamental error applies to those cases in which the defendant was probably ... actually innocent." The Court then specified that "in an extraordinary case, where a constitutional violation has probably resulted in the conviction of one who is actually innocent, a federal habeas court may grant the writ even in the absence of a showing of cause for the procedural default."

Actual innocence, which is the basis of my original **civil rights complaint initiated in the Louisiana Western District and continued in the US Fifth Circuit**, is more than probable and can be proven without a doubt now. Denial led to more illegal activity by Kristy. Kristy et al showed absolutely no proof of recent violation of voided judgments by harassment, endangerment, or threat of bodily harm. No evidence warranted my arrest on August 26, 2020, and constitutes more perjury. This also continues to prove my **malicious prosecution complaint dismissed by Judge Hicks of LAWD**. Kristy et al used the latest service items I sent to them as grounds for "mail contact" that warranted a violation of the expired, wrongfully modified, and voided judgments that resulted in protective orders against me and subsequent jailing for no actual violation. I exercised my legal responsibility to serve them since February 2020, with no complaint of violation. Serving the US Supreme Court documents is what is deemed "illegal contact". I initially used 2

¹ "Murray v. Carrier, 477 U. S. 478, 495, 496 (1986)".

different Shreveport based process servers. When they reported Kristy was dodging service, I began to use certified mail. I was additionally and wrongfully imprisoned for a missed court date that I did not miss because my motions were paid for, filed in a timely fashion, and were not denied. I paid for “judgments” on September 3, 2020, that I do not legally have. The fees were also miscalculated, not taking into account Kristy was 2 days past the **6 month** expiration date of her voided judgement that was illegally modified. I did not have to report to court in the First Judicial. The State of Louisiana and Kristy et al, have no rebuttal for the events that took place, and the lengths at which the court has gone to deny my right to a fair trial can attest to my innocence. Procedural errors are astounding, as well, from law enforcement to federal judges. I now better understand the timeframe that federal law enforcement was in the private building without a warrant, which was greater than 30 mins, before they arrested me. I had to verify the warrant myself, with all law enforcement present and knowing they were in violation. I went with them because none of them volunteered to follow the law. I knew they would be back, and I did not want to endanger the lives of additional innocent people in the surrounding area.

State courts within the United States may define fundamental error rules independently of the federal courts. State fundamental error rules may include errors which violate rights in addition to those

rights guaranteed by the U.S. Constitution, but these rules may not infringe upon federal fundamental rights. The state court of Louisiana, First Judicial District, claimed jurisdiction to enter judgment, but then violated my right to appeal in 5 different cases by not transferring the record to the appellate court (Louisiana Second Circuit), and as of today, October 5, 2020, I have no notice of formal denial of my appeals. I filed in February 2020. As of today, I have no answer to any of the motions I filed in timely manner and judgements were entered even though order forms were present and requested a judge's signature. They were filed without a signature and have yet to be denied. I have open cases in the First Judicial District Court in Shreveport, LA and in the US Fifth Circuit. However, I was jailed in 2 different states, at the request of the State of Louisiana from August 26-September 2, 2020, while we awaited this court's oversight for open cases. I was illegally detained after I posted bail 4 times and was transferred to two different facilities as a free person. I was arrested by an officer who initially misrepresented himself and his agency to me to gain my trust. His formal title of US Marshal, did not give him jurisdiction to question me about evidence given to him by the First Judicial Court in March 2020, that proved more perjury by Kristy. I also gave him the confession written by a participant of the fraud ring, and he did not report it. He arrested me instead. Federal Agent Ladado told me to call the "white collar division" of the FBI, as if he were some other division

of the FBI. I notified the fraud departments immediately following. As of October 5, 2020, due to the lack of transfer to the lower appellate court by the First Judicial District Court of Shreveport, the judicial errors have yet to be addressed and the higher court *may* reverse the lower court's error in whole or in part and remand with instructions to the lower court. The Louisiana First Judicial never obtained jurisdiction over my person, had questionable subject matter, and declined to transfer the case to a more appropriate venue that could legally act over the subject and the diversity of citizenship without reaching. That motion order form is also unsigned as of Oct 5, 2020.

I have not received a fair trial in any court hearing. Partiality has been exhibited on multiple occasions especially when as pro se, I have been held to the stringent standards of professional attorneys when documents I submitted were adequate in their original forms, and I was asked to resubmit. These attempts to obstruct justice are noted. Judge Brun has acted without jurisdiction, without merit and endangered the purity of the law. There have been multiple reversible errors committed by every clerk of every court I have contacted. I highlighted them as benign clerical errors, but some were never corrected as such, which makes them intentional and the voided judgments the result, which are reversible upon

appeal. I notified the Supreme Clerk of the errors that the respondents committed in not following this court's directions. I agree with reversal in its entirety by this Court or this Court remanding the lower courts to reverse their own errors and rule in my favor granting all stated relief in my civil rights complaint, including complete expungement of my record with removal of my identifying information, photos, etc from the jail records and the internet. I also request punitive damages for the subsequent incidents allowed to happen due to this gross miscarriage of justice.

All lives should matter in the eyes of the law, not just dead ones at the hands of the law. The Louisiana and Texas Courts and prison systems endangered my physical life, my livelihood, and broke the law. There should be consequences for those who committed perjury and for those who hunted me down and held me against my will, like a captured runaway slave. Louisiana courts had substantial reason to believe their intel was far from legitimate, including the way they obtained it, prior to the pursuit. Judge Brun, who signed the warrant, the office of the First Judicial clerk, the office of the Louisiana Supreme Court clerk, and the office of the Louisiana Attorney General/constituent services were all aware that prior to my arrest there was no violation

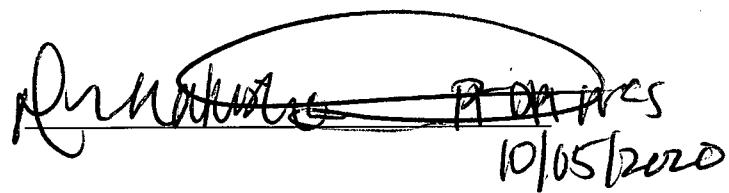
and no judgment. I deserve justice while I am alive to see it.



Dr. NaKisha Jackson, PT, DPT, WCS

10/05/2020

I certify that this document is presented in good faith and not for delay. Its grounds contain intervening circumstances of a substantial or controlling effect and other substantial grounds not previously presented. Your time and consideration are appreciated.



Dr. NaKisha Jackson, PT, DPT, WCS
10/05/2020

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