

**ORIGINAL**

Supreme Court, U.S.  
FILED

**SEP 26 2019**

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Case No. 19-6126

**IN THE  
SUPREME COURT OF THE UNITED STATES**

Abdelbaset Youssef - Petitioner

Vs

Bill Schuette et al - Respondents

**ON PETITION FOR A WRIT OF CERTIORARI TO**

**U.S. Six Circuit Court of Appeals**

PETITION FOR WRIT OF CERTIORARI

Abdelbaset A Youssef

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## **QUESTION PRESENTED**

**Whether the Six Circuit Court of Appeals' decision affirming motion to dismiss on Younger Abstention conflicts with the Supreme Court's decision in SPRINT COMMUNICATIONS, INC. v. JACOBS and the same Court's decision on Doe v. Univ. of Ky?**

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## **LIST OF PARTIES**

Abdelbaset Youssef  
Petitioner

Vs.

- 1 - Bill Schuette; Previous Michigan Attorney General
  - 2 - Dana Nessel; Current Michigan Attorney General
  - 3 - Mohammed Arsiwala; Chairman of Michigan Board of Medicine
  - 4 - Michigan Board of Medicine; Members of State Agency
  - 5 - Rosalie Tocco-Bradley; Member of the Board of Medicine
- Respondents on their official and individual capacities

## **RELATED CASES**

- 1 - Abdelbaset Youssef v. Bill Schuette et al

Case No. 0:19 – 01225, U.S. Six Circuit Court of Appeals.

Decision on 9/17/2019, affirms motion to dismiss on Younger Abstention.

- 2 - Youssef v. Schuette, et al

Case No. 2:18-cv-13549 U.S. District Court Eastern District of Michigan  
Order granting motion to dismiss on 3/5/2019.

- 3 - Youssef v. Schuette et al

Case No. 2:17 -cv–10610 U.S. District Court Eastern District of Michigan  
Order granting motion to dismiss on 8/10/2017.

**IN THE  
SUPREME COURT OF THE UNITED STATES  
*ON PETITION FOR A WRIT OF CERTIORARI TO***

**U.S. Six Circuit Court of Appeals**

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

**OPINION BLEOW**

I - The Opinion of the United States Six Circuit Court of Appeals Appears at: Appendix # A to the petition and it is unpublished, issued on 9/17/2019

II - Opinion of the United States District Court appears at Appendix # B to the petition and it is unpublished, issued on 3/5/2019

**JURISDICTION**

**For cases from federal courts:**

**The date on which the United States Court of Appeals decided my case was on 9/17/2019. No petition for rehearing was timely filed in my case.**

**The Jurisdiction on this Court is invoked under 28 U.S.C. 1354(1)**

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28 USC 1331 and 1343	
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## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

### **I - Amendment # I**

**Freedom of Religion, Speech, and the Press:** Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof, or abridging the freedom of speech or of the press, or the right of the people peaceably to assemble and to petition the government for a redress of grievances.

### **II - Amendment # XIV, Section 1.**

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.

**III - 42 U.S.C. 1983:** Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.

## STATEMENT OF THE FACTS

1 - Due to quasi-judicial immunity and state immunity, the Federal Court cannot grant relief for retroactive injury. The Federal Court can grant prospective injunction of state violation. Due to personal conflict with an Assistant Attorney General, Michigan State officials abused their power and used defects in the legal system to violate my civil rights. I am a U.S citizen have the right of at least some constitutional protection. Six state officials, shielded with immunity, over four years, committed 17 legally cognizable felonies against justice under the tent of the law and immunity.

2 - The violation started on 9/18/2014, when Andrew Hudson (AAG) filed complaint supposed to be about controlled substance, but through the complaint he was writing about Tylenol believing it narcotic. He stated in a hearing that the complaint was outside his experience. Mr. Hudson accused me that I was trying to defame him through addressing the defects in the complaint that created personal conflict with Mr. Hudson, who threaten me to retaliate.

3 - On 11/4/2014, Rosalie Tocco-Bradley MD, The Pain consultant and member of the Board of Medicine (Defendant # 4) investigated me and my patients' files and the complaint. In presence of Mr. Hudson, she said to me: you had been seeing very thick people and doing fine and it is ok to keep working. Even she said that she disappeared and left me alone fighting Mr. Hudson and the other officials who lined up with him in a street kind of fighting for years. Dr. Bradley failed to transfer



what she found in the investigation to the Board of Medicine as she is member of it and the only physician put hand in the case.

4 - Mr. Hudson (AAG) asked me to pay \$5000 for settlement; I refused because he had to tell some-thing wrong that I did for the fine. On 4/23/15, Mr. Hudson conducted scandalous hearing before ALJ, who was the cousin of the complainant (five felonies committed in relation to this hearing alone). The AAG intentionally selected the ALJ who was the cousin of the complainant and made haven for two witnesses to commit perjury about management of patient B.S., the ALJ's relative. On 10/30/2015, my license was suspended 6 months and one day and \$20,000 fine, without due process of law. In violation of law the order was issued without reviewing my exceptions that divulged the perjury. Even they did not mention that I filed Exceptions.

*5 - The only proceeding that State of Michigan has ever initiated was this complaint and hearing on 4/23/2015 that was concluded with suspension 6 months and one day. The suspension started on 11/30/2015 and satisfied on 4/27/2016. Instead of six months, so, far I have been suspended for four years. Since 4/27/2016, the state or any of its agencies have never initiated any proceeding, quasi-criminal, civil or for enforcement order or for anything else. Any proceeding after the hearing of 4/23/2015, the federal plaintiff has initiated as petitions for reinstatement. The suspension for six months, was satisfied more than three years ago.*

6 – I appealed the administrative order, but the Michigan Court of Appeals (COA) affirmed and stated that it is not its role to assess credibility of the witness or how the Board reviewed the record. The COA has only appellate jurisdiction that only decide how the law was applied and it cannot correct order tailored in bad faith in a state agency. The COA stated that once there was a hearing and the record was reviewed, the due process was satisfied. The order was suspension for six months while appeal took 18 months without staying the order. So, the Appeal was useless anyway. Staying the order pending appeal was in the hand of Mr. Hudson (AAG), who refused to stay.

7 - I filed complaint twice to Mr. Bill Schuette, Michigan Attorney General (Defendant # 1) to investigate crimes committed on the daylight by his assistants and other officials. Mr. Schuette ignored my complaints. Only after I filed the first complaint in the Federal Court, Mr. Schuette fired both Andrew Hudson and Jessica Taub from being AAGs, but he did not correct my situation.

8 – While the Appeal was pending, I filed the first complaint in the Federal Court in case 2:17-cv-10610. The case was dismissed for it was state interest and the defendants were shielded by quasi-judicial immunity. I went to the Michigan Court of Claims; the case was dismissed for the immunity of the defendants as well. The Michigan Court of Claims stated that due to immunity, I cannot sue for crimes committed in relation to a quasi-judicial proceeding.

9 – After the order of suspension was satisfied and the fine was paid, on 3/5/2016, while the appeal was pending, I filed the first petition for reinstatement. On

12/21/2016, after another scandalous hearing conducted on 7/5/2016, to decide if I was eligible for reinstatement, the board of medicine denied reinstatement of my license. The stated reason for denying, as in the hearing record and ALJ's PFD, that since I appealed the six months suspension, I did not admit my mistake, so I was not eligible for reinstatement. Deny reinstatement was stated openly retaliation for filing appeal. Jessica Taub AAG was fired because she presented document contains false information in the hearing. (The first petition and its hearing were remedial pure civil Administrative Proceeding initiated by the Federal plaintiff's petition requesting reinstatement of his license, the proceeding ended on 12/21/2017 with final order denying reinstatement).

10 - I found myself a victim of 17 crimes committed on the daylight by six people, the immunity put their feet on the top of the constitution. I stayed home and sold everything I could sell. On 5/31/2018 my home was in Wayne Circuit Court for sale in auction, but some people donated to pay the late payments and stop foreclosure. Due to stress of feeling injustice I was admitted 4 times in 4 hospitals for heart injury.

11 - I wrote my book (The Legal Felony; Quasi-Judicial immunity is a back window for committing crimes). In my book details about 17 well documented crimes against justice committed on the nose of the constitution and the court, under the shield of immunity. The immunity created sect of noble people above the law commit crimes on the daylight. My Book was for defending the Constitution.

12 - On 12/23/2017, I filed the second petition for reinstatement of my license. By law the state agency may file opposition within 30 days. If there was no opposition the application would go for processing the reinstatement. The opposition was due on 1/22/2017. The state agency failed to file opposition on time. So, reinstatement of my license was due on or after 1/23/2018.

13 - On 1/30/2018, I published my book (The Legal Felony) in Amazon and other bookstores, through Ingram publishing company. Publishing my Book is protected by the Constitutional freedom of speech, Amendment I, and it is in public interest.

14 - On 2/13/2018, the agency, instead of processing the reinstatement, in violation of the law, they filed late opposition and scheduled me for a hearing before Administrative Law Judge (ALJ). The hearing was to see if I am eligible for reinstatement, *it was not for punishment for a wrong act.*

15 - They selected the (ALJ) the same one, who abused me during the hearing of 7/5/2016 for the first application for reinstatement that I filed on 3/5/2016. This ALJ's name was mentioned in my book and in my complaints to the Michigan Attorney General and in my exception to his PFD.

16 - My motion to recuse the ALJ and assign the case to a randomly selected ALJ was granted, and the case was assigned to Hon. Judge Eric Williams (ALJ).

17 - Even I had known that Judge Williams would do good job because he was randomly selected, I lost hope because the ALJ did not have the authority of final decision. ALJ only issues PFD. The agency controlled by AAG could turn around the PFD and deny reinstatement of the license on the nose of the Administrative

Hearing System. Even I was able to fly from the intentionally selected ALJ, I would not fly from the AAG, who run the business of the Board from A to Z. I had to look for License in another state. The AAGs do the business of the Board of Medicine from A to Z. The Board of Medicine are very busy physicians travel to Lansing, Michigan every two months for few hours meeting.

18 - I filed application in Florida Board of Medicine for license. In Florida, I had chance to meet with the full Board in a recorded meeting in a place open to the public. Florida Board told me that they could not issue license before it is be cleared in Michigan. I cannot get license in any state because my license is suspended in Michigan. To get License in another state, I had to win the fight in Michigan first.

19 - Hon. Judge Williams (ALJ), as expected, had done very good job in a very short time and issued PFD just five days after the hearing recommending reinstatement of my license. The ALJ noticed my suffering of injustice so he put priority of the case and issued PFD on 7/10/2018. This hearing was for deciding eligibility for reinstatement, so, the second petition and its hearing were pure civil remedial proceeding initiated by the plaintiff's petition for reinstatement.

20 - The ALJ has the authority to issue PFD but the final decision would be in the board of medicine. According to the Law the Board's decision was due within two months after 7/10/2018. On 9/19/2018, the Board reviewed the PFD but denied reinstatement against the recommendation of the ALJ. Even they denied the reinstatement on 9/19/2018, they signed the final order on 1/16/2019. The proceeding that was pending before the Board of Medicine was to review the ALJ's

proposal for decision recommending reinstatement. The Board supposed to either accept the recommendations and reinstate the license or deny the reinstatement. *The proceeding was not to punish me for wrong act or to enforce a judgment, it was to assess if I was eligible for benefit.*

21 – On 11/14/2018, after I had known that they denied my application, I filed the subject second complaint in the U.S. District Court (2:18-cv-13549) for prospective injunction of violation of my constitutional rights and order the Board of Medicine shall honor the ALJ's proposal of decision issued after one year proceeding and two full days hearing without filing exceptions as described in law or saying anything other than retaliation for filing complaints in the previous three years and publishing a book. (42 USC 1983 and Amendment I and XIV).

22 – The District Court stayed until the final order was signed on 1/16/2019, then the district court dismissed my complaint on 3/5/2019, by granting Motion Dismiss. On the day when I filed the federal complaint, 11/14/2018, the Board had reviewed the PFD and denied the reinstatement on 9/19/2018. On the day when the court dismissed the case there was no pending proceeding in the state agency or court. The Administrative proceeding was concluded on 1/16/2019 by signing the final order that was decided in the Board's meeting on 9/19/2018. *This proceeding was initiated on 12/23/2017 by plaintiff's petition requesting reinstatement his license. It was pure civil, remedial and he was able to withdraw it at any time. The Board was reviewing the Proposal for Decision recommending reinstatement.*

23 – The only state quasi-criminal proceeding was initiated by filing administrative complaint on 9/18/2014 and it was concluded by final order suspended my license six months and \$20,000 fine issued on 10/31/2015, which was satisfied on 4/27/2016. Since 10/30/2015, the state has never initiated any kind of proceeding.

24 - The District Court dismissed the prospective injunction complaint for four causes. I filed appeal for four questions; Rooker – Feldman, Younger Abstention, Quasi-judicial Immunity, and State Immunity. The Court of Appeals affirmed the order for Younger Abstention, where there was no pending state initiated proceeding since 10/31/2015. The suspension was not for life long, it was for only six months, satisfied on 4/27/2016 and the fine was paid before 4/27/2016.

**25 - The proceeding before the Board of Medicine was reviewing the ALJ's PFD recommending reinstatement of License upon the Plaintiff's petition. It was not akin to criminal proceeding see *Huffman v. Pursue, Ltd.*, 420 U. S. 592, or that implicate a State's interest in enforcing the orders and judgments of its courts, see *Pennzoil Co. v. Texaco Inc.*, 481 U. S. , or pending "civil proceedings involving certain orders . . . uniquely in furtherance of the state courts' ability to perform their judicial functions. Nor was it initiated by "the State in its sovereign capacity," *Trainor v. Hernandez*, 431 U. S. 434, 444, to sanction me for some wrongful act, see, e.g., *Middlesex County Ethics Comm. v. Garden State Bar Assn.*, 457 U. S. 423, 433–434.**

26 – The Court of Appeals decision is in clear conflict with the Supreme Court decision in *SPRINT COMMUNICATIONS, INC. v. JACOBS*.

THE SUPREME COURT Held:

*Held: This case does not fall within any of the three classes of exceptional cases for which Younger abstention is appropriate. Pp. 6–12.*

*(a) The District Court had jurisdiction to decide whether federal law preempted the IUB's decision, see Verizon Md. Inc. v. Public Serv. Comm'n of Md., 535 U. S. 635, 642, and thus had a "virtually unflagging obligation" to hear and decide the case, Colorado River Water Conservation Dist. v. United States, 424 U. S. 800, 817. In Younger, this Court recognized an exception to that obligation for cases in which there is a parallel, pending state criminal proceeding. This Court has extended Younger abstention to particular state civil proceedings that are akin to criminal prosecutions, see Huffman v. Pursue, Ltd., 420 U. S. 592, or that implicate a State's interest in enforcing the orders and judgments of its courts, see Pennzoil Co. v. Texaco Inc., 481 U. S., but has reaffirmed that "only exceptional circumstances justify a federal court's refusal to decide a case in deference to the States," New Orleans Public Service, Inc. v. Council of City of New Orleans, 491 U. S. 350, 368 (NOPSI). NOPSI identified three such "exceptional circumstances." First, Younger precludes federal intrusion into ongoing state criminal prosecutions. See 491 U. S., at 368. Second, certain "civil enforcement proceedings" warrant Younger abstention. Ibid. Finally, federal courts should refrain from interfering with pending "civil proceedings involving certain orders . . . uniquely in furtherance of the state courts' ability to perform their judicial functions." Ibid. This Court has not applied Younger*



*outside these three “exceptional” categories, and rules, in accord with NOPSI, that they define Younger’s scope. Pp. 6–8.*

*(b) The initial IUB proceeding does not fall within any of NOPSI’s three exceptional categories and therefore does not trigger Younger abstention. The first and third categories plainly do not accommodate the IUB’s proceeding, which was civil, not criminal in character, and which did not touch on a state court’s ability to perform its judicial function. Nor is the IUB’s order an act of civil enforcement of the kind to which Younger has been extended. The IUB proceeding is not akin to a criminal prosecution.” Huffman, 420 U. S., at 604. Nor was it initiated by “the State in its sovereign capacity,” Trainor v. Hernandez, 431 U. S. 434, 444, to sanction Sprint for some wrongful act, see, e.g., Middlesex County Ethics Comm. v. Garden State Bar Assn., 457 U. S. 423, 433–434. Rather, the action was initiated by Sprint, a private corporation. No state authority conducted an investigation into Sprint’s activities or lodged a formal complaint against Sprint. Once Sprint withdrew the complaint that commenced administrative proceedings, the IUB argues, those proceedings became, essentially, a civil enforcement action. However, the IUB’s adjudicative Cite authority was invoked to settle a civil dispute between two private parties, not to sanction Sprint for a wrongful act. In holding that abstention was the proper course, the Eighth Circuit misinterpreted this Court’s decision in Middlesex to mean that Younger abstention is warranted whenever there is (1) “an ongoing state judicial proceeding, which (2) implicates important state interests, and (3) . . . provide[s] an adequate opportunity to raise [federal] challenges.” In Middlesex, the Court invoked*

*Younger to bar a federal court from entertaining a lawyer's challenge to a state ethics committee's pending investigation of the lawyer. Unlike the IUB's proceeding, however, the state ethics committee's hearing in Middlesex was plainly "akin to a criminal proceeding": An investigation and formal complaint preceded the hearing, an agency of the State's Supreme Court initiated the hearing, and the hearing's purpose was to determine whether the lawyer should be disciplined for failing to meet the State's professional conduct standards. 457 U. S., at 433– 435. The three Middlesex conditions invoked by the Court of Appeals were therefore not dispositive; they were, instead, additional factors appropriately considered by the federal court before invoking Younger. Younger extends to the three "exceptional circumstances" identified in NOPSI, but no further. Pp. 8–11. 690 F. 3d 864, reversed. GINSBURG, J., delivered the opinion for a unanimous Court.*

## **REASONS FOR GRANTING THE PETITION**

**I - We are before two similar cases with conflicting dispositions. Each can be cited differently.**

### **1 - First case, SPRINT COMMUNICATIONS, INC. v. JACOBS.**

The Supreme Court reversed Younger Abstention because It was not: akin to criminal proceeding see *Huffman v. Pursue, Ltd.*, 420 U. S. 592, or 2 - that implicate a State's interest in enforcing the orders and judgments of its courts, see *Pennzoil Co. v. Texaco Inc.*, 481 U. S. , or 3 - pending "civil proceedings involving certain orders . . . uniquely in furtherance of the state courts' ability to perform their judicial functions. 4 - Nor was it initiated by "the State in its sovereign capacity," *Trainor v.*

Hernandez, 431 U. S. 434, 444, to sanction Sprint for some wrongful act, see, e.g., Middlesex County Ethics Comm. v. Garden State Bar Assn., 457 U. S. 423, 433–434. Rather, the action was initiated by Sprint, a private corporation. No state authority conducted an investigation into Sprint’s activities or lodged a formal complaint against Sprint. Once Sprint withdrew the complaint that commenced administrative proceedings

## **2 - The current case is: Abdelbaset Youssef v. Bill Schuette et al**

The Six Circuit of Appeals affirmed granting motion to dismiss on Younger Abstention, even it has all the same elements as of Sprint case.

Namely : It was no: 1 - akin to criminal proceeding see Huffman v. Pursue, Ltd., 420 U. S. 592, or 2 - that implicate a State’s interest in enforcing the orders and judgments of its courts, see Pennzoil Co. v. Texaco Inc., 481 U. S. or 3 - pending “civil proceedings involving certain orders . . . uniquely in furtherance of the state courts’ ability to perform their judicial functions. 4 - Nor was it initiated by “the State in its sovereign capacity,” Trainor v. Hernandez, 431 U. S. 434, 444, to sanction me for some wrongful act, see, e.g., Middlesex County Ethics Comm. v. Garden State Bar Assn., 457 U. S. 423, 433 434. Rather, the action was initiated by Youssef’s petition, requesting reinstatement of license, a private individual. The ALJ recommended reinstatement. The Board just to review the ALJ’s PFD. No state authority conducted an investigation into Youssef’s activities or lodged a formal complaint against Youssef since 2014. Once Youssef withdrew the petition that commenced administrative proceedings. The State complaint that was filed on

9/18/2014, was concluded on 10/30/2015, and the punishment was satisfied more than about three and half years ago.

*Younger abstention is appropriate only when the parallel state proceedings are “coercive,” rather than “remedial,” in nature. 690 F. 3d 864, 868 (2012); cf. Guillemard-Ginorio v. Contreras-Gómez, 585 F. 3d 508, 522 (CA1 2009) proceedings must be coercive, and in most cases, state initiated, in order to warrant abstention.*

## **II – The Six Circuit’s decision in my case conflicts with the same Court’s decision in Doe v. Univ. of Ky**

***Doe v. Univ. of Ky., 860 F.3d 365, 368 (6th Cir. 2017);** This case arises out of the federal district court's involvement in an ongoing disciplinary hearing against John Doe<sup>1</sup> at the University of Kentucky. For the reasons contained herein, we affirm the district court's decision to abstain, reverse the district court's dismissal of the claims against Defendant Denise Simpson, and **remand to the district court to stay the case pending conclusion of the university proceedings.***

The Court remanded the case for stay pending conclusion of the university disciplinary proceeding.

**In my case the same Court stated:** *First, proceedings were ongoing. Youssef filed his most recent medical license reinstatement request with the Board on January 29, 2018. The Board held a hearing on that request, and an administrative law judge recommended reinstatement on July 10, 2018. The Board denied this second application for reinstatement on January 16, 2019. Before that decision, Youssef filed this suit on November 11, 2018 in other words, while his state license reinstatement proceedings were ongoing.*

**The Board voted for deny reinstatement on 9/19/2018 and I filed the complaint in the federal Court on 11/14/2018. The Final order deny was signed on 1/16/2019 and the District Court dismissed the case on 3/5/2019. The odd is staying for ongoing quasi-criminal case, in Doe v. Univ. KY, while in my case applied Younger Abstention in pure civil case had been already concluded before the District Court dismissed the case. Even if the Court had dismissed the case before 1/16/2019, the Court of Appeal should remand the case for stay pending final board's decision, even we did not need stay because the District order issued after I filed motion with supplemental brief stating the final order had been issued on 1/16/2019., which means there was no pending proceeding.**

**III - The Six Circuit erred when applied the following three cases on my case. All the three following cases were initiated by a State to discipline the federal plaintiffs. In my case, I initiated the proceeding by filing petition for reinstatement license and the hearing was to assess if I was eligible to practice. Deny reinstatement against the recommendation of ALJ was not a part of disciplinary six months suspension punishment that satisfied more than three years ago. It was retaliation for publishing my Book (The Legal Felony).**

**The Six Circuit stated:** *The ongoing state administrative proceedings here are neither a criminal prosecution nor uniquely in furtherance of state courts' judicial functions, but we have held that similar administrative proceedings are "akin to criminal prosecutions." Doe, 860 F.3d at 370 (state university disciplinary proceedings); Watts v. Burkhardt, 854 F.2d 839, 846 (6th Cir. 1988) (Tennessee medical license suspension proceedings); Middlesex Cty., 457 U.S. at 433-34*

*(attorney disciplinary proceedings). Lacking a distinction between those cases and this one, we conclude that Michigan Board of Medicine proceedings are “akin to criminal proceedings.”* **There is clear distinction!**

**1 - Doe v. Univ. of Ky., 860 F.3d 365, 368 (6th Cir. 2017);** This case arises out of the federal district court's involvement in an **ongoing disciplinary hearing** against John Doe at the University of Kentucky. For the reasons contained herein, we affirm the district court's decision to abstain, reverse the district court's dismissal of the claims against Defendant Denise Simpson, and remand to the district court to stay the case pending conclusion of the university proceedings.

**2 - Watts v. Burkhart, 854 F.2d 839, 846 (6th Cir. 1988);** Appellant Bobby Watts, a physician licensed to practice medicine in Tennessee, filed this action pursuant to 42 U.S.C. 1983, seeking to enjoin a pending state administrative proceeding **initiated by the Tennessee** Division of Health Related Board for purpose of summarily suspending Watt's license to practice medicine.

**3 - Middlesex Cty., 457 U.S. at 433-34 Held:** The federal courts should abstain from interfering with **the ongoing disciplinary proceedings** within the jurisdiction of the New Jersey Supreme Court. Pp. 457 U. S. 431-437.

**Here is a legal test; if I survived 50 years more, then I filed petition for reinstatement and went to a hearing, will it be treated as a quasi-criminal case related to the state complaint in 2014, concluded in 2015?**

**IV – The Six Circuit stated that:** *True, as Youssef points out, Younger does not apply in a few exceptional circumstances when the state acts in bad faith, to harass,*

*or to enforce a patently invalid statute. Doe, 860 F.3d at 371. Youssef alleges that his situation implicates those exceptional circumstances, but he provides no support for those allegations. Such "bare assertions of legal conclusions," see, e.g., Z. Techs. Corp. v. Lubrizol Corp., 753 F.3d 594, 597 (6th Cir. 2014), neither require nor permit us to find a Younger exception here.*

The standard of motion to dismiss, the Court must take the allegations in the complaint as true. I supported my allegations with 15 official documents as exhibits from A through Q. The defendants did not dispute any of these official documents.

## CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted

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