Appeal #: _____

19-8609

IN THE SUPREME COURT OF UNITED STATES

MADHU SAMEER

Petitioner

V

SAMEER KHERA ET AL

Respondents

ORIGINAL

ON PETITION FOR A WRIT OF CERTIORARI TO THE NINTH CIRCUIT COURT OF APPEAL

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PETITION FOR WRIT OF CENTRIORI

========== Petitioner

Petitioner
MADHU SAMEER
5 Old Hospital Road, Rd # 1,
Whangaroa 0478
New Zealand
Self Represented

Respondents
Sameer Khera
Divine Arts and Entertainment
Attorneys:
JENNIFER J. PANICKER
SEAN A. FREDIN
LLOYD WINTER, P.C.
1724Broadway Street, Suite 6
Fresno, CA 93721
Telephone: (559) 233-3636
Facsimile: (559) 385-2000 j
winter@lloydwinterlaw.com

Snehal Devani
Healthy Masala Llc
Self Represented
Current Address Unknown
Emails: snehal.devani@yahoo.com
snehaldevani@gmail.com

Hector Moreno & Associates
Hector Moreno
Rory Coetzee
Andrew Westover
Constance Smith
Raechelle Vellarde
Kathryn Walsh
Attorneys:
James A. Murphy – 062223
JMurphy@mpbf. com
Kristin L. Iversen — 286787
KIversen@mpbf.com
MURPHY, PEARSON, BRADLEY & FEENEY
88 Kearny Street, 10th Floor'
San Francisco, CA 941085530
Telephone: (415) 788-1900
Facsimile: (415) 393-8087

Michael Millen
Self Represented
119 Calle Marguerita Ste. 100
Los Gatos, CA 95032
Telephone: (408) 871-0777
Fax: (408) 866-7480 mikemillen@aol.com

William Purdue
Attorneys:
Bradley A Benning
Bruce McLoed Willouby,
Stuart, Benning & Cook Inc
50 San Fernando Street, St 400
San Jose 95113
408-289-1972 408-295-6375
brad@wsbclawyers.com
bruce@wsbclawyers.com

Benett & Becker Llc
Susan Benett
Lewis Becker
Attorneys:
John S Burton
55 River St, Stw 230,
Santa Cruz, CA 94060

Lenore Schreiber
Attorneys:
Marshall Whitney
Mandy Jeffcoach
Kelley Lowe
8050 N Palm Avenue, Ste 110
Fresno, CA 93711
Ph: 559-753-2550
Fax: 559-796-2560

Francine Tone
Tone & Tone
Attorneys :
Natalie P. Vance,
Kristin N. Blake,
KLINEDINST PC
801 K Street, Suite 2100
Sacramento, CA 95814
(916) 444-7573
FAX (916) 444-7544
nvance@klinedinstlaw.com
kblake@klinedinstlaw.com

Gregory Ellis
Attorneys :
Arnold J Anchordoquy
Sean T Cook
Clifford & Brown1430
Truxton Avenue, Ste 900
Bakersfield, CA 93301
661-322-6023
661-332-3508

County of Fresno
John Dryer
Kari Gilbert
Attorneys
Michelle E. Sassano
Weakley & Arendt
1630 E. Shaw Ave., Suite 176
Fresno, California 93710
(559) 221-5256
michelle@walawfresno.com

Edward Davila
T C Zayner
Gary Green
Kristie Culvert Kapetan
Attorneys:
CRAIG L. JUDSON SHARON M. NAGLE
Bold, Polisner, Maddow, Nelson & Judson
2125 Oak Grove Road, Suite 210
Walnut Creek, CA 94598
Ph: (925) 933-7777
Fax (925) 933-7804
snagle@bpmnj.com

Sally White
Sally White Inc
Attorneys:
FARLEY J. NEUMAN
TOM PROUNTZOS
GOODMAN NEUMAN HAMILTON LLP
417 Montgomery Street, 10th Floor
San Francisco, California 94104
Telephone: (415) 705-0400
Facsimile: (415) 705-0411
fneuman@gnhllp.com;
tprountzos@gnhllp.com

Sandra Schuster
Self represented
161 W. 25th Avenue, Ste.102D,
San Mateo, CA 94403
sschuster@sbcglobal.net

Thornton Davidson
Self Represented
3451 W Shaw Ave Suite 105,
Fresno, CA 93711

QUESTIONS PRESENTED FOR REVIEW

1. Whether District Court's Characterisation of a suit seeking injunctive, declarative relief and damages against making of Unconstitutional and Void Judgments as Frivolous is Unconstitutional ?
2. Whether It is Unsupported By Legal Precedents?
3. Whether Defendants Are Liable for their Actions ?

RELATED CASES

SL	Case #	Description	Status
1	103FL116302	Marital Dissolution Case	Ongoing
2	05CEFS02946	Child Support Case in Fresno County	Ongoing
3	1108CVXXX	Legal Malpractice Case against PARDUE	Forced Settlement
4	114CV2661152	Legal Malpractice Case Against MORENO et al	Dismissed without trial; Sanctioned
5	14 CECG03660	Damages, against KHERA	Dismissed without trial, sanctions
6	14 CECG03709	Petition to file case against attorneys under 1714.10	Dismissed without trial
7	15 CECG00351	Damages against KHERA, BENETT, BECKER, SCHREIBER, ZAYNER, MORE ET AL	Dismissed against all except MORENO et al
8	17 CECG04020	Current complaint in Fed Court was first filed in State Court	Dismissed without hearing
9	1-17-CV-1748	Current case	Dismissed without hearing
10	H035957	Appeal against termination of spousal support	Affirmed
11	H040565	Consolidated appeal against a) Denial of reuest to void Judgment b) Request for enforcement of Judgments or divide undivided assets c) attorney fee and sanctions for child custody litigation in which I prevailed	Dismissed
12	H042147	Appeal against dismissal of legal malpractice case against MORENO et al	Dismissed
13	H044037	Appeal against granting of arbitrary $152,000 attoreny fee award	Dimissed
14	H046694	Appeal against order denying request to declare Judgments of 2008 void	**Pending**
14	F070938	Appeal against denial of motion to enforcement of child support arrears with prejudice	Affirmed; Appellate Division refused to provide designated records
15	F072323		Dismissed
16	F073333		Dismissed

15	F071888	Appeal against granting ANTI SLAPP suit in 15 CECG00351	Affirmed, Appellate Division refused to provide designated records
16	F074544	Appeal againt granting of attorney fee award for ANTI SLAPP suit in 15 CECG00351	Dismissed, Appellate Division refused to provide designated records
17	F073777	Appeal against granting of ANTI SLAPP motion and attorney fee award	Affirmed; Appellate Division refused to provide designated records
18	F078293	Appeal against dismissal of my motin for sanctions, relocation expenses for children	Pending, Appellate Division refuses to provide designated records
19	SXXX	Petition for Review for F070938	Denied
20	S254572	Petition for Review for F071888	Denied
21	S259509	Petition for Review for H040565	Denied
22	S261228	Petition for Review for F073777	Denied
23	19-15011	Appeal in 9th circuit against dismissal of the federal suit	Affirmed
24	13697/2019	Legal process in India for forgery, and fraudulent transfer of DLF 4109, New Delhi	**Pending**
25	4982/2019	Police Complaint and legal processes for complaint against theft of my jerelry etc, from safe deposit box in India	**Pending**

LIST OF PARTIES TO PROCEEDINGS

List of Defendants

1. Sameer Khera
2. Divine Arts and Entertainment
3. Snehal Devani
4. Healthy Masala Llc
5. Hector Moreno & Associates
6. Hector More & Associates,
7. Hector Moreno
8. Rory Coetzee
9. Andrew Westover
10. Constance Smith
11. Raechelle Vellarde
12. Kathryn Walsh
13. Michael Millen
14. William Purdue
15. Thornton Davidson
16. Benett & Becker Llc
17. Susan Benett
18. Lewis Becker
19. Sandra Schuster
20. Sally White
21. Sally White Llc
22. Francine Tone
23. Tone & Tone Llc
24. Gregory Ellis
25. Lenore Schreiber
26. County of Fresno
27. John Dryer
28. Kari Gilbert
29. Edward Davila
30. T C Zayner
31. Gary Green
32. Kristie Culvert Kapetan

DISCLOSURE OF CONFLICT OF INTEREST

Defendant EDWARD DAVILA is currently a Federal Court Judge. At the time, between 2003 – 2010, he was a Judge in the Family Court Division in Santa Clara County. He is married to Justice MARY GREENWOOD, the presiding Judge over my Appeals in the state court.

Defendant HECTOR MORENO is an ex-deputy district attorney, father of Michael Moreno, Deputy District Attorney, Santa Clara County. His father was a Judge in Santa Clara County.

Defendant Constance Smith at all times herein, was a Deputy District Attorney , Santa Clara County.

These two are associated with the Attoreny General's Office, which represented DCSS, Fresno in the appeal F070938, and presented partial/altered documents for augmentation, and made false representation of facts about the case.

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The Opinion of the United States District Court appears at Appendix B to the petition, and is unpublished

STATEMENT OF THE BASIS FOR JURISDICTION

The Judgment of the Court of Appeal was enteed on 8/27/2019. A Petition for rehearing could not be filed in the 9th Circuit because I was in India, in the state of Jammu & Kashmir at the time, subjected to communication blackout due to abrogation of Article 370 of the Indian Constitution. This Court extended the time to file Petition for Review to Jan 24, 2020. The Petition ws thereafter returned for amendment -to be refiled or mailed within 60 days. Courts jurisdiction rests on 28 USCS 1254(1).

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7. Ca Fam 5601
8. Ca Fam 17400 et seq
9. Ca Civ Code 1714.41
10. Ca Fam 271
11. 18 USC 228 (1994)
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STATEMENT OF THE CASE

FACTUAL BACKGROUND

This is a complex marriage dissolution case which began in Family Court in the Santa Clara County,California,in 2003,and then spilled over to Department of Child Support,Fresno,Family Courts Fresno,Civil Courts in Santa Clara and Fresno,Appellate Courts in Santa Clara & Fresno County,Supreme Court of California,District Court in New Delhi,India,and now,to Supreme Court of United States.It began as a conspiracy to defraud me of 90% of the property,support and attorney fee in the marriage dissolution case(103FL116302) in 2008.Over time,it morphed into a conspiracy to deprive me of my civil rights with an intention to conceal the crimes of the prime defendant,the attorneys on both sides,the expert witnesses,and the Judicial Officers.

I was married to defendant KHERA for 18 years,and we together earned over $500,000 at the time of separation.We owned or had owned at least 8 properties internationally,several bank,brokerage accounts. In 2008, EDWARD DAVILA(DAVILA) made a string of Judgments(Judgments of 2008,C,598),that are void as a matter of law for clear lack of jurisdiction,and because they violate federal and state laws.Since 2008,Judicial Officers in Fresno have overturned them,but Santa Clara judicial Officers neither enforce them, nor do they declare them void. KHERA has continued to unjustly enriched from holding onto my assets as a threat to make me comply with his demands.

General

My parents passed away early, and I inherited real estate,funds, household effects, the proceeds from their Life Insurance Policy etc. I received them in 1986, right before I got married to SAMEER KHERA(KHERA) (1986-2003,18 years).Thereafter,the funds were reinvested in a Term Deposit in Sriram Fibres in 1986-1987,and some of them were later re-invested in the two DLF properties in 1992 (C,1022-1033).I also inherited, and was gifted articles of gold, silver diamond and rubies, documented at approx.$200,000 at separation in 2003,worth around $800,000 today. These were held in a safe deposit box in Canara Bank(C,947). This was not all what we had, but this was what the safe deposit box contained. A TWO(2) bedroom furnished apartment in Vasant Kunj,New Delhi(VASANT KUNJ APARTMENT) was given to me (C,100; 1047-1051)). It remained in my aunts name(Mrs CHANDA KAUL) for my own protection, until KHERA forged her signatures.

We lived in India until 1986, in UAE(1986-1995),Sydney,Australia(1995-1998),and in in US(2003 -2015).I now live in New Zealand(2015 till date).Assets from before my marriage, and those collected during my marriage - my pension funds,superannuation funds,IRA, investment accounts,and my own bank accounts where my salary was deposited -were in my name until 1998.

In 1996,while in Sydney,Australia,I separated for 2 years(1996-1998).I saved every penny to buy a home(sole property) – the PARAMATTA HOUSE in early 1998 (C,1044-1046).

In retaliation,KHERA bribed two witnesses to testify that his mother PUSHPA KHERA was CHANDA KAUL, she forged CHANDA KAUL's signature, and sold my VASANT KUNJ apartment for around $150,000 without CHANDA KAUL's permission (C,940). This money was deposited in the Canara Bank A/c, which was in KHERA"s control. Repeatedly,KHERA promised that it would be considered my personal property if I returned to marriage.

In 1997, I gave Sameer 50% of the down payment and jointly purchased a property chareterised as WAHROONGA HOUSE in Sydney (C,111-115).

In 1998, we bought an RCI timeshare in Australia, relocated to US, and bought the SUNNYVALE HOUSE using pooled funds (C,1057-1059). Because **I have never officially worked in US(worked as a stock trader from home) for long enough,I am not entitled to Social Security,disability benefits,or any other benefits.**

During 1998 - 2003,KHERA systematically transferred all my financial assets - my bank accounts,investments,provident fund accounts,superannuation accounts in Australia,and he cashed everything, and/or moved everything to his accounts,or to joint accounts. Sexual, physical and emotional abuse followed. I wanted a divorce and he offered to pay me $305,000 to take care of my living and legal expenses until a divorce was finalised,if I would let him stay in the family home until divorce was thru. I relocated to Fresno with two little children,4,and 5 at the time. If he had not agreed to transfer funds to cover my daily expenses until the divorce was finalized,I would have had him evicted from the family home and sought a pendent lite attorney fee award under Fam 2030-2032 – which is the law

Between 1998 – 2003 our family income was between $350,00 - $500,000 per annum(C,96-5201). In anticipation of divorce,KHERA insisted on selling off the TWO(2) Australian properties with my consent. I was to receive 100% of the proceeds from sale of PARAMATTA property,and 50% from the proceeds from the sale of WAHROONGA property.I relied on his assurances,but **he reneged on the agreement**,. In 1997,KHERA admitted to our marriage counsellor Dr Fanibanda that he had intentionally stripped me of all my finances,had intentionally damaged my career,and had forced me into having two more children because he wanted to become totally dependant on him so I would not leave him again.

In July 2003, I had an auto accident in which my children were severely injured.I was charged with,and plead guilty to a felony.Thereafter,I was barred for life from working as a Social Worker by Department of Social Services(C,557-573].

1. **Marital Dissolution In Santa Clara County(Child Support,Spousal Support,and Property)**

In Sept 2003,a petition to dissolve the marriage was filed by SUSAN BENETT(BENETT) and LEWIS BECER(BECKER).A Temporary Restraining Order(ATRO) made under Uniform Marriage and Divorce Act, prohibiting KHERA from purchasing and selling,transferring

community property was made in Sept 2003.Temporary support orders were made in Dec 2003(C,581),in which Court Ordered that *"Immediately upon learning what his bonus is for any period, he **shall** notify counsel and parties shall meet and confer with respect to additional support payable from that bonus. If they are unable to stipulate, they shall agree upon a hearing date for the court to hear that issue. . ." (C,1529-1534).* custody orders were made in 2004, I was granted 78% custody of the two children. KHERA had 22%.

BENETT&BECKER advised KHERA not to comply with these support or custody orders.

In early 2005,Parties retained Jim Cox for settlement under California Rules of Court CRC2.834. During settlement conferences,KHERA and his attorneys failed to disclose sale of assets.I remained unaware of the unlawful sale of family assets until 2009. Additional Orders,related to property and support were filed by private judge Jim Cox on Jan 31,2006 in Santa Clara(C,589 -597; 1536-1544).BENETT&BECKER again advised KHERA to violate these orders.

Defendant used proceeds from the sale of family assets to buy at least TWO properties in Santa Clara County (CUPERTINO HOUSE (C,1073-1091), and STONEBRIDGE HOUSE (C,1096) without my permission or knowledge(C,126-142;p.143-149),failed to disclose these,or any rental income from them. He funded his honeymoon to Australia in 2006 using community funds from our Australian banks.While in Australia,the couple zeroed out our accounts,and carried these funds back to US in cash.The same year,in 2006,KHERA travelled to India with his wife Snehal, bribed two expert witnesses,who testified before competent authorities that the woman accompanying KHERA, Snehal Devani was Madhu Sameer. Devani forged my signatures on transfer deed, conveying community property DLF-4109 to KHERA's name in a cashless transfer(C,82-86;1022-1028). He also opened two new accounts in Canara Bank and transferred funds from the jointly owned accounts t his individual accounts..As Mrs and Mr Khera,the two also operated my safe deposit box held in Canara Bank and stole my jewelry,gold coins and bullion etc from the safe deposit box(C,940).
KHERA,BENETT,BENETT,PARDUE then argued in Santa Clara that the parties had no safe deposit box in India,no jewellery,no bank,brokerage and check accounts in India,or Australia,no real estate, that I was delusional.

Bribery of expert Witnesses - SALLY WHITE(CPA)

To violate Judge Cox's orders[1536-1544], in 2006,KHERA,BENETT,BECKER bribed(paid significantly more than the normal amount),to SALLY WHITE,in return for her agreement to provide false reports and testimony. WHITE was bribed to state that there were no properties in Australia/India,and no bank/brokerage accounts in either of these countries(See C,1268). WHITE now charged this $305,000 against sale of community stock options that had been sold by KHERA without my permission or knowledge (C,1268), showing that I had already been paid for these stock options. In 2008, KHERA claimed before DAVILA that the amount of $305,000 had been prepaid for the sale of Sunnvale House. So KHERA,his attorneys,and CPA engaged in fraudulent (quadruptle) accounting of the $305,000.

This amount of $305,000 had been transferred by KHERA into my post separation Citibank account, which also contained my personal post separation income, child support income, and spousal support income. But CPA has charged the original bank account - BOA with $305,000 - to me(although KHERA was awarded this account during the oral recitation).In addition she charged the Citibank account(into which the BOA funds were received) to me separately – multiplying the already quadrupled funds by a factor of 2(a total of 8 times multiplied).

Funds from Citibank would routinely be moved back and forth between my Schwab and Brown & Co account, which I used to trade stocks and generate income. WHITE also charged me with SCHWAB and Brown & Co Accounts – which contained money that had been transferred from Citibank,which contained money that had been transferred from Bank of America – multiplying it again by a factor of 2 - the same money accounted 16 times in 16 different places.

In 2005,the Brown & Co Brokerage firm was acquired by E*Trade Brokerage house.So the account in Brown & Co became E*Trade account with a new account number.Brown & Co ceased to exist. Sally White shows that E*Trade account had additional monies that I had taken from KHERA.Thus already inflated 16 times – it was again accounted as a E*Trade Account,for the 17th time - there would be more creative accounting. .

I opened a new SCHWAB **IRA** account post separation,which was also charged as community property - accounted Eighteenth(18th) Time. All my post separation earnings were accounted as KHERA's money,which is the Ninteenth(19th) time the money that did not exist as community property,was "created" by CPA,defendant WHITE.

A simple $305,000,transferred to my account by KHERA,to meet my everyday living and legal expenses,was charged to me Nineteen times over, This is fraud in the strictest sense. I will be able to provide these documents.

In 2006, KHERA bought the Cupertino house paying $1.6m in cash. WHITE reported that KHERA's wife had given him $1.6million to buy the CUPERTINO house using the proceeds from the sale of her STONEBRIDGE house.Net proceeds from sale of this house were $646,391. She could not have paid $1.7m from the sale of the STONEBRIDGE house. See KHERA's I&E showing house was bought cash down for 1.7m [C,299-305;312-320] with a small mortgage of $137,000- see previous schedule of assets showing $2m in assets [C,267-274] – which $2m disppeared.

WHITE reported only 5 bank accounts (C,329] – Brown&Co, Charles Schwab, St George, Dragon, ETrade 9855. Of these the first two were mine. The rest had already been zeroed out by 2006. In reality, KHERA had opened over 20 bank accounts since separation. In Smith Barney alone, he had the following accounts : **46047, **5437, **00187, **0692, **9376, **5437 [C,1283-1300]. See checks KHERA encashed from sale of community property in Smith Barney Brokerage Accounts which **WHITE failed to report**. He encashed checks for $16,305, $51,369.85, $50,345.90, $6,390.32, $6964.78, $62,479.92, 20,362.64, $7.03, $38, 254.97, $15,111.92, $36,933.02, $21,438.50,$46,165.37, $46,885 in 2005-2006. [C,1282-

1300]. He sold community stocks in Smith Barney without my knowledge or permission [C,1280]. He sold all ESPPs which were community property – having declared them as personal property, he also failed to pay support on it. He also sold community stock options [C,1279-1280] in 2006. In addition, he had opened 8 more Bank of America Accounts [**0692, **5324, **4117, **4172, **1430, ** 4329, **6317, **358] and held Term Deposits in these accounts, totalling to several hundred thousands. He opened four Chase Bank accounts, THREE (3) E*Trade Accounts **5354, *3405, *6705 accounts, and an E*Trade Traditional IRA Account. He admitted to having one (1) Ameritrade Brokerage Accounts that went unreported. He used these funds to pay personal expenses, thus depleting the accounts [C,1281-1282]. Some of these funds were withdawn as cash from ATM, and later deposited as cash ATM transactions.

On 5/7/2007 he made an ATM cash deposit of 46,165.37
On 5/7/2007, he made a ATM cash deposit of $46,739.52
On 10/12/06 he deposit in cash 40,000 in BOA *6014
No corresponding withdrawl is recorded on any of the above mentioned accounts.
On 4/16/2007, KHERA provided a cheque for $90,000 to someone.
On 3/29 KHERA transferred a Term Deposit (unreported) # 2476702962 to his BOA account [See C,293].

Investment income of $4583.56 from community funds, was never reported and no child support was paid on this [C,0297]. Instead, he used this income to pay off $4000 of his bills [C,299], and withdrew $3919.90 [C,303] and moved $3857.11 to mutual funds [C.302] which were never reported by WHITE. Term deposit held in joint accounts were not reported by WHITE:

On 3/29/07 another Term Deposit (CD# 865513626) of $10,000 was transferred
On 04/09/2007, another Term Deposit CD#065513623 for $90,000 was transferred
On 04/09/2007, another Term Deposit CD#02476702969 for $90,000 was transferred
These were all *before* the settlement conference, in the quiet period before the trial, so no discovery could have brought them forth.
On 03/16/2007 Khera transferred $2270 and $6139 [C,293]

Similarly, his list of withdrawals from Smith Barney is not being presented here. Smith Barney were community assets. WHITE helped him conceal the fraudulent transfer of these community assets. **At the very least, I had a right to examine these assets.**

In 2006, the property DLF 4109 was fraudulently transferred to KHERA's sole name, achieved by bribery of witnesses and forgery of my signatures.

White failed to report that KHERA removed $50,000 from *my* Brown & Co account **12794 without my knowledge or permission [C,1105]. The check must have been deposited in one of his designated accounts, and she testified that she had traced all his accounts, yet she failed to report this "income" thru theft and bank fraud. WHITE failed to report his overseas accounts in St Georges Bank - # ***3378 and *** 6571 which had contained $9,500 on 5-4-04 [C,274; 1271-1278]. She concealed his accounts in Canara Bank A/C # **1598 in India (C,947), which in 2003 contained the proceeds from sale of VASANT KUNJ APARTMEN

(approx $150,000) that he had promised to return to me as a condition for my return into marriage. She failed to report two new accounts in Canara Bank where the community funds had been moved - Canara Bank accounts **128, and *129. He had several other bank accounts in India which remain unreported.

There were other bank and brokerage accounts that were zeroised or closed, and were fraudulently later awarded to me – my ETrade IRA.WHITE failed to report the accounts he held jointly with the children, these were used to launder money. Exhibit at [App C.355] shows $96,990 of the laundered money was hidden in children's accounts.

WHITE's reports did not show any property or bank or brokerage accounts overseas (C,321). WHITE failed to show that parties had held five other accounts – Eagle Star Insurance Policy which contained 9953.08 at the time of separation, Retirement savings of 9239.09, and ALICO Insurance Policies which had over $10,000, Life Insurance Policies in India with face value of around $10,000 at the time, payable in 2000, RCI timeshare, worth over $25,000. She failed to report retirements accounts of 401K, ING accounts [C,249-271], and pension funds held in India, term deposits held in India in Sriram Fibres Ltd at. Although summons had been issued for CISCO and ING, these were never served – defendants *intended* to defraud me of these amounts.

WHITE declared that the proceeds from sale of SUNNYVALE HOUSE, ESPP, Stock options were KHERA"s personal property/income, and advised that KHERA did not have to pay any tax on this income, nor support on this income. WHITE also advised KHERA that all expenses during 2002-2003,*prior to Sept 2003,ie prior to separation,* were also chargeable to me.She reported entertainment expenses,restaurant bills,legal advice KHERA had sought before the parties separated in June 2003.[1]. Based on the aforementioned fraudulent accounting, **WHITE reported that *I* owed KHERA $246,457 in equalising payments [C,1269].** WHITE aided and abetted KHERA in commission of money laundering, securities fraud, support fraud, and helped KHERA defraud me.

Original orders issued in 2003[1529-1534],,ordered KHERA to pay child and spousal support on all of his income. BENETT,BECKER,WHITE advised him to violate these orders.KHERA remains non compliant till date.

She reported his income in 2007 as approx $11,247 per month (C,.611-612), all the while while he was encashing the checks outlined above from Smith Barney. She computed his child support obligations at **$2,680** per month.WHITE advised KHERA that he was not required to pay additional support on Stock,bonds,ESPP and investment income.

In 2007, DCSS,intercepted KHERA's financial records and reported his gross income at $65,000 per month,or $780,000 per annum,which included the proceeds from sale of assets.

[1] All of SALLY WHITEs reports, submitted as Exhibits with the Judgments of 2008, have recently been acquired by me. These are voluminous, and therefore are not included at this time. They can be provided if Court orders, and will definitely be provided if the Petition is granted.

Even though BECKER had agreed that the childcare expenses would be discussed at the time of settlement or trial[C,1256], WHITE advised KHERA to not pay court ordered childcare and medical reimbursements, nor pay rent on the SUNNYVALE HOUSE. Judge COX had already ordered KHERA to pay rent and childcare in 2006.

Judge ALLEN HILL assessed KHERA's income for 2008 at 439,456, and child support obligations for 2008 at $439,456. However,KHERA had concealed his income from sale of SUNNYVALE HOUSE,therefore the child support orders were significantly lower than DCSS's more accurate computations of $8,180. MORENO did not object.**BENET,BECKER, WHITE conspired to deprive me of my rights to support also, aiding and abetting KHERA in commission of support fraud, wire, mail, bank, and securities fraud.**

WHITE reported that our family lifestyle was $44,100 in 1997-2003, or $3,680 per month [p.1488] which constitutes intentional misrepresentation. She stated that KHERA was not required to pay any spousal support. Tax reports show an income between $232,438 in 2002 - $650,000 in 2000, between 1997-2003.I did not earn $5000 per month **WHITE was unqualified to make vocational, or spousal support recommendations.**

WHITE advised KHERA not to pay support on income from the sale of SUNNYVALE HOMEShe was also able to help KHERA illegally evade child and spousal support payments on $450,000 and any interest payable. Child Support on additional income is generally 11.25% of the amount, and spousal support is generally 22.5% of the additional income (See dissomaster on Judge ALLEN HILL's orders, 2014, [C,635]. Therefore, Child Support outstanding would be $50,625 and Spousal Support wold be 101,250 in 2006.Thereafter,a simple interest calculation at 10% per annum is $5062.5 per annum and 10,125.00 in spousa support per year. In 2020, total outstanding child support, $121,500 and spousal support is $243,000. Total child and spousal support arising from this income is $364,500

In 2003,KHERA received $129,000 or so in bonus payments from his employer.According to Support orders of 2003[1529-1534],and Judge COX's orders of 2006 [1536-1544],he was required to pay 11/24 of this amount to me as property,and pay support on the remaining income. Instead, he opened a new E*Trade Account with these funds, and bribed WHITE to report that this income was his personal income, and he was not required to pay child support on this income – in violation of Judge COX's orders [1536-1544]. He used this account comtaining cimmunit funds, to pay his bills.

By concealing this amount, of $129,000 for 2003,KHERA and the attorneys were able to illegally help KHERA evade court ordered support and interest payable s per 2003 orders. .At 11.25%,this amount was $14,512, and Spousal Support was 22.5%, ie $29,025 in 2003. With 10% simple interest, outstanding child support for 17 years is $24,671, and spousal support is $78,365.5. Total Child and Spousal Support outstanding from this income is 117.551.30.

Total amount of Child and Spousal Support outstanding from these two transactions, is approx $482,051.00, of which child support is $160,683. This is in excess of $10,000,payable

for children residing in another state,has remained outstanding since 2003/2006 - significantly more than 2 years 18USC 228(a)(3)). For the purpose of this offense, wilful failure to pay child support obligations, it makes no difference from what source the defendant receives income [*US v Edelkind,525 F3d 388 (5th Cir,2008].* Defendants good faith, albeit unreasonable belief that he or she did not wilfully violate the child support order because he or she believed that the order was no longer binding, is not a valid defense to this offense [*US v Edelkind*, supra]..

This is just a tip of the iceberg,KHERA has failed to pay support on proceeds from sale of stock options on sale of millions of dollars since 2003.He has also failed to pay support on bonus income in 2007,and in 2013 which are in excess of $250,000 cumulative.He has failed to pay support on income from his self employment activities[2], business activities, investment income,rental income,and above all,income from inheritance –estimated to be in excess of $500,000. He failed to pay children's childcare and medical expenses in excess of $100,000, tutoring expenses of over $20,000.**The total amount that is owed to children is significantly in excess of $500,000. Total Spousal Support payable in 2007 was in excess of $1mm property related payments are in excess of $3m which DAVILA coerced me to waive in 2008.** The email I wrote to my psychologist that evening states ***"I have never been gang raped, but I can now imagine what it feels like"*** [C,1560].[3]

SANDRA SCHUSTER(Vocational Assessor)

The Vocational Assessor,Sandra Schuster,was similarly bribed to prepare reports with false information in them.She falsely reported that I was employable as a Social Worker and could earn an income of $37,000 - $90,000 within 2 years as a licensed professional (C,1491-1503). This is pure fraud - I was barred from working as a Social Worker due to the felony conviction arising from an auto accident in 2003(C,1504-1519).SCHUSTER also lied under oath about the time it takes to procure a Social Worker's license. Licensing authority informs the registrants that Social Worker's license,on an average,takes between 4 – 6 years.Ms Schuster had been paid far more than her fee,to lie under oath.

Attorney & Judicial Misconduct - DAVILA

In May 2007,a mandatory settlement conference was held in Santa Clara County,and BENETT et al offered $298,000 in final settlement,which I refused (See PARDUE's advisement of the offer on p.1521-1522, where PARDUE states: "*present offer totalling $278,000 is more than reasonable*"). .For three days,I was coerced,threatened and intimidated by DAVILA,and attorneys on both sides,but I kept refusing.On the final day,after an in-chamber consultation with DAVILA,PRDUE informed me that DAVILA had threatened to

[2] KHERA owns many private business – among them a restaurant in Milpitas, a radio show in Santa Clara county, an ecommerce portal that sells HomeGoods imported from India, on facebook, and thru other sales channels.

[3] No sane person would knowingly, voluntarily waive these amounts, except under extreme threat, duress, and harassment. I did not even have any significant income, nor was I entitled to any welfare, spcial security, disability payments from the United States government. Defendants' statements that I voluntarily entered into the purported agreement represents intentional misrepresentations to lower and appellate courts, in a continuing conspiracy to defraud, and they show a total, reckless disregard to morality, ethics, and requirements of their profession.

retaliate against him(and me) if I continued to refuse their offer.He gave me in writing that this was the best agreement I could hope for(""*present offer totalling $278,000 is more than reasonable* ",C,1521-1522), and stated that DAVILA had threatened to sanction me to $189,000. He made me sign the Substitution of Attorney Forms[4] to further intimidate me [C,1523-1524]. I was new in US,I relied on his fraudulent representation,and finally capitulated on the 3rd day,agreeing to settle without trial.

An oral agreement was recited in the Court(C,695-725).Parties had agreed to an amount of $278,000 in cash payments [See C,1521-1522, in addition to other terms and conditions outlined in the Judgment. During the recitation,BECKER and BENETT figures of $279,000,$179,000,and $115,000 were used, and my efforts at clarifying these amounts were rebuffed by attorneys and DAVILA. All arrears were waived. Parties agreed to **guideline support**(C,1546-1544).My spousal support was limited to $2600,2100,1600 and terminated in 3 years,even though I had been married for 18 years and was entitled to lifelong support,to maintain the marital standard of living – which was between $315,424-$615,206 per annum [C,1312-1449]. Property was divided as on the Judgment of 2008. I was not aware that the bank, brokerage accounst being awarded to me had either been zeroised, or had already been closed, or were fake. I did not know that fake properties that did not exist were being awarded to me. I relied on KHERA,the attorneys,and the Judicial Officer to prepare the oral recitations as per the law,and to ensure that the assets awarded to me actually existed.

DAVILA coerced me into waiving attorney fee of over $200,000. Thereafter,Judge ELFVING ordered to pay $600 per month towards the children's transportation to Santa Clara County by a limousine.PARDUE failed to object.

Between May 2007 and Sept 2007,defendants KHERA,BENETT & BECKER,PARDUE attempted to coerce me into signing a stipulation which was not the agreement that had been orally recited in the Court.Instead of $279,000 in cash,they now stated that they would give me only $169,000 which was further reduced to $115,000(C,604;1843-1845).The agreement had been for $279,000. More verbiage was added to my detriment. For example,defendants wanted to put in that a) KHERA's income was only $3,680 per month for spousal support purposes [Khera v Sameer,2012],and $11,247 per month for child support purposes [C,.611-612],and b) KHERA's child support obligations were only $2,680 per month, c) this was in the best interest of children, d) Fresno County did not have jurisdiction e) KHERA was not required to pay tax on income from SUNNYVALE sale proceeds, and would not pay support on it. I refused to sign a stipulation with such lies in it. In Oct 2007,BECKER filed pleadings where he falsely argued that Fresno County had acquired jurisdiction *after* the May 17,2007, and DAVILA agreed, also insisting that KHERA should not be required to pay tax on proceeds from the sale of SUNNYVALE HOUSE.

[4]He used these forms later during the oral recitation of the Settlement Agreement to blackmail me, and then filed these forms when I protected against the language of the proposed stipulation.

When I refused to sign, PARDUE informed me that DAVILA had threatened him again.He filed the substitution of attorney form that he had made me sign on the 3rd day of the settlement conference,and he abandoned me [C,1523-1524]. He then sabotaged all my efforts to get the accounts audited by Deloittes,obstructed my effort to retain an attorney, and removed significant documents from the casefile.I refused to sign the purported stipulation,and retained Camilla Cochran in Santa Clara County,and Judith Soley in Fresno County to represent me.Camilla Cochran filed numerous pleadings to no avail. She stated that she would help me contest thembut substituted out under threat of retaliation from DAVILA, March 2008.

My Attorneys 2008 till date

In Aug 2008,I retained Hector Moreno(MORENO) in Santa Clara County.In 2009,MORENO et al filed a motion to set aside these Judgments. MORENO appointed a total of EIGHT(8) attorneys (HECTOR MORENO,RORY COETZEE,ANDREW WESTOVER,CONSTANCE SMITH,RAECHELLE VELLARDE,KAYLEIGH WALSH,MICHAEL MILLEN,FRANCINE TONE), two dozen paralegals, and other support staff, two accounting firms,RUNDQUEST and MICHAEL SMITH, and began bleeding me financially. In a short time he billed approx $300,000 and secured extensive evidence of the alleged fraud.However, none of this evidence was ever presentd to the Superior or to the Appellate Courts. Attorenys informed me that they had "compromised" with DAVILA,and his successor ZAYNER under threats of retaliation and diluted the case at their orders, and to protect other defendants.

2. Property Issues

Motion to set aside Judgments of 2008 filed in 2009, was denied by ZAYNER in 2013. In 2013, I filed a Motion to void Judgments of 2008. It was denied by ZAYNER without any justification. An Appeal was filed H040565. I then filed a motion for enforcement of the Judgments of 2008, and division of undivided assets. These were also denied by Zayner, and an appeal was filed, that was consolidated with H040565. The Appellate Division refused to provide me with the designated records and transcripts. The appeal was dismissed in 2019 by Justice MARY GREENWOOD, Judge DAVILAs wife – after the federal case was filed against DAVILA.

The properties awarded to me in the Judgments are either fake, and do not exist at all, or have ben sold off by KHERA by forging my signatures. Others, that did existed have been retained by him. In 2018, I again attempted to have a property released to meet my living expenses. Judge MCGOWEN refused to order KHERA to release the property. Hence, in Dec 2018, I filed a motion to void the Judgments, My motion was denied by Judge MCGOWEN on Feb 7, 2019. Subsequently, she refused to enter the judgment, and the appeal was stalled.

3. Spousal Support In Santa Clara County

In 2007, I was coerced by DAVILA et al into accepting the inadequate, inequitable step down arrangement in Spousal Support. MORENO filed a Motion for Continuation of Spousal Support in 2009, that was denied by by DAVILA in 2010[C,1573; 1674-2010]. MORENO and Francine Tone(TONE) together filed an appeal H035957 in Sixth District of California.Defendant KHERA was represented by Gregory Ellis(ELLIS). Attorneys from both sides conspired to protect DAVILA,BENETT & BECKER at the Appellate Court to my detriment.

In 2011,Department of Social Services issued orders imposing a lifelong ban as a social worker. (C,557-573). I also had a stroke in 2008, and in 2010, I was immobilised for almost 18 months

with a herniated disc. Defendants MORENO et al *intentionally* failed to present these orders and medical records to Appellate Courts in support of my petition for continuation os spousal support. They also refused to argue that DAVILA's Judgments were void as a matter of law. Instead, these attorenys, in conjunction with the opposing counsel, fabricated a set of facts – t *weaken* my petition. They stated that I was working in a PhD program full time, and therefore unable to work, and that there were no jobs in Fresno. Each of these was an intentional misrepresentation. In parallel, MORENO had been representing me in the child support trial in Fresno County, where he argued that I was working15 hours per day, in 3 jobs concurrently, and had ample job opportunities5 but did not have adequate chidcare[5] because Khera was refusing to pay childcare. In Fresno, he presented the Order from Department of Social Services (C,557-573). The contradiction between Fresno and Santa Clara County shows the *intention* to mislead the Appellate Court, the goal being to protect DAVILA, and the opposing counsels BENETT BECKER, PARDUE, SCHUSTER, WHITE – **the association in fact enterprise members** - by sabotaging my appeal, yet billing me over $40,000 for such intentional breach of fiduciary duty.

Child Custody & Attorney Fee In Santa Clara County

In 2010,KHERA voluntary resignation from his job where he earned over $800,000 per annum.After several acts of domestic violence/sexual molestation of children(C,578),I sought and was granted sole legal and physical custody of children,and permission to relocate to New Zealand. SCHREIBER was engaged by KHERA to threaten, intimidate, harass me and my children in order so I may be influenced to give up custody. In 2011, she and KHERA arrived at my house unannounced, trespassed over my property, threatened, intimidated and became physically abusive towards children, attempted to abduct the children, and stalked me and my children for over 45 minutes. Few days later, KHERA stalked my house for 9 hours. Then he recruited his friends who threatened to murder me. Two complaints seeking restraining orders were filed but the court felt such order would affect his career. Thus rewarded, KHERA continued with his misconduct. By 2014, three custody evaluations including Fam 3118 **evaluation, had been held, and I had prevailed in each one of them. Evaluator Dr Jeffrey Kline stated "*KHERA has no insight how his own behaviour is causing his problems, and unreasonably blames the mother*"**. I was granted sole legal and physical custody, and permission to relocate. Yet, my request for attorney fee was denied by ZAYNER in retaliation, even though I prevailed. Subsequently, KHERA filed false police reports stating I had abducted the children. INTERPOL was involved. In 2016, my younger son travelled to US, and was arrested by the police as an abducted child. I incurred significant expenses in having him released. The last of the children emancipated in Dec 2017.

4. Child Support,Attorney Fee In Fresno In Fresno

In 2005, Child Support Orders were registered in Fresno County and Santa Clara County lost jurisdiction on Child Support under Fam 5601(a) and(e) and **in 2005, DCSS assessed outstanding arrears at $13,808.43** [C,1471-1473] but failed to enforce these till date.

On Jan 30, 2006, Additional Orders were filed by Judge James Cox,after protracted settlement [1536-1544], these involved support. His attorneys advised KHERA to violate these orders, and KHERA never complied with these orders.

[5] The number of jobs and my work details were submitted to Judge ALLEN HILL (C,1568-1570), and are outlined in Judge ALLEN HILLs orders of 2014 (C,627;1576-1613)

On Jan 3,2008,DCSS,Fresno,filed a motion for modification of child support. DCSS assessed KHERA's gross income in 2007 to be $65,000 per month,net income at $35,000 per month. They assessed his child support obligations at $8,180 per month,and **outstanding child support,payable at $2047 per month**.(C,1475-1478). The outstanding has remained unpaid till date. In 2015, DCSS attorney John DYER attemted to make these arrears disappear under the corrupt influence of SCHREIBER and GREEN.

To circumvent these obligations of $8,180 per month, KHERA approached DAVILA in Jan 2008, seeking alternate support orders. DAVILA attempted to coerce me into agreeing to accept $2680 in child support. When I refused, he made child support orders for a fixed amount of $2,680 per month without due process, also waiving all support arrears.He even sanctioned me. DCSS, refused to cede jurisdiction, and the matter was litigated from 2008 - 2014. As early as 2008, SCHREIBER et al were aware that the Judgments were void. The records[6] show that in 2008, SCHREIBER stated the following in an open Court:

> *"I believe the Santa Clara order which was filed in Feb 11,2008 which addresses retrospective child support,cannot be enforced because Ms Sameer originally in 2005 registered the order down here in Fresno,therefore Santa Clara has no jurisdiction. I discussed this with Mr Goldstein, Ms Soley may not know this."*
> Thereafter, Mr Goldstein, the DCSS attorney reiterated that the Judgments from Santa Clara were out of jurisdiction.
> *COMMISSIONER DUNCAN stated "Everyone seems to be in agreement""(C,pg 615)*

Yet SCHREIBER went thru a trial from 2011-2013, at an expense of $220,000 to me, without probable cause, seeking enforcement of these void Judgments of 2008, and in 2014, again insisted that the Judgments were valid – the latter led to an appeal F070938, which was affirmed.

In 2012, KHERA's father passed away,and he inherited significant amounts in cash, stocks, bonds, real estate. Parties were in trial. SCHREIBER advised KHERA not pay probate tax on this income,and he did not pay any support either.

SCHREIBER and MORENO dragged the trial for 3+ years only with an intent to maximize their attorney fee. Ultimately, after having made in excess of $100,000 each, attorneys on both sides conspired between themselves,without my knowledge,or permission,and reached an agreement to waive arrears,childcare,medical expenses,and all attorney fee incurred by JUDITH SOLEY.This totalled to a waiver of over $300,000. In return for such waiver,MORENO et al negotiated an attorney fee for himself, payable directly to him. MORENO et al then refused to file childcare,medical,attorney bills depriving me of over $300,000 in outstanding childcare, medical and attorney fee,in addition to hundreds of thousands in arrears.

In Feb 2014,Judge ALLEN HILL overturned the Judgments of 2008,(C,598),awarded support based on Smith Ostler,also awarding $92,000 in attorney fee payable to me(C,627;1576-1613). MORENO had been paid all but $67,000 of his fee.Post trial,SCHREIBER began blackmailing me,thru my new child support attorney KIM AGUIRRE, coercing me to accept lower

[6] There is a VHS recording of the entire proceedings in the possession of FamilY Court Services. All DCSS proceedings are recorded. In 2011, I borrowed these VHS tapes, and noted the proceedings, and sent an email to my attorney HECTOR MORENO, about the contents of the tape. The document at App C, pg 615 (also at 1481-1483) is the email that was sent to MORENO about the contents of the tape.

support/arears than had been ordered and advised KHERA not to comply with Judge ALLEN HILL's orders(C,627;1576-1613).

MORENO and SCHREIBER conspired to deprive me of all of $92,000. That failed when in 2016, COMMISSIONER ERIN CHILD apportioned the amount and released $60,000 to him, and $30,000 to me. [C,978]. MORENO then obtained a default order against me from ELFVING in Santa Clara County, during my noticed unavailability,for an additional/arbitrary amount of $152,634 [C,970-971]– even though no attorney fee was outstanding.

In 2014, pursuant to being granted sole legal and physical custody of the children, I filed a motion for enforcement and determination of child support arrears. The matter was heard on Dec 15,2014. DCSS attorney JOHN DYER falsely informed two Courts that KHERA was current on child support. GREEN denied my request for child support arrears *with prejudice* [C,963 last line, GREEN confesses he denied with prejudice],also denying my requet for temporary support pursuant to having been granted sole legal and physical custody.Children are emancipated now, but since 2014, when the custody order was first made, Judge KALEMKARIAN has thwarted all my efforts to the child support revised.

A Motion for Ongoing support was filed in 2013 after I acquired sole legal and physical custody of the children. In November,2014,I filed a motion for sanctions against KHERA/SCHREIBER in Fresno County to recover the remaining attorney costs. I also filed a motion seeking children's relocation expenses. A consolidated trial was set for June 16, 2015. Judge KALEMKARIAN deferred the trial until further notice. During this period, he deprived me of discovery procedures. In 2017, when the last of the children had emancipated, he arbitrarily dismissed all the pending trials with prejudice. As a consequence of the aforementioned dismissal,I was unable to pay for the relocation costs of the children,had to face involuntary bankruptcy,and all my household effects were auctioned.I now fear losing my home in New Zealand,as I still owe over $60,000 to the freight forwarders. An appeal F078293 was filed. I appealed F070938. Appellate Court affirmed the denial of enforcement of arrears.

5. Civil Litigation In Santa Clara County - Including Appeals

In 2008, I filed a legal malpractice against PARDUE. MORENO et al appointed their friend MICHAEL MILLEN as an attorney. Despite extorting huge amount of money from me,MILLEN abandoned me after 4+ years, just a few days before the trial was scheduled.

I filed a complaint against defendant KHERA for conspiracy,fraud,malicious prosecution etc..I also filed a petition seeking permission to file a complaint based on conspiracy(CCP 1714.14) against BENETT,BECKER.These were dismissed without hearing by Judge ELFVING.

In 2014, I also filed 1-14CV 2661152 - legal malpractice suit against MORENO for actions pertaining to Santa Clara litigation. It was arbitrarily dismissed by ELFVING, who also sanctioned me to an amount of over $15,000. An appeal was filed, but was arbitrarily dismissed by Fifth Appellate District. ELFVING then granted their cross complaint against me and awarded them $152,634 [C,970-971]– in an unopposed default order, during my noticed unavailability in June 2015, while I was relocating to New Zealand. He refused to set it aside in 2016. An appeal was filed(H044037),but Appellate Division refused to provide designated records and transcripts on appeal, and even after I had paid over $990 in reporter's transcripts,the appeal was arbitrarily dismissed by Justice MARY GREENWOOD, Judge DAVILA's wife. No refunds on reporter's transcripts were made.

Attorney THORNTON.DAVIDSON had signed a substitution of attorney and offered to represent me in all pending litigations in Fresno and Santa Clara County, during my noticed unavailability, but he abandoned me, presumably under threats or corrupt influences of Judicial Officers or other attorneys.

6. **Civil** Litigation In Fresno County

In Fresno County,I filed four civil complaints against defendants seeking injunctive, declarative relief and damages. 15 CECG00351, 14 CECG03660, 14 CECG03709, alleging indictable criminal offenses. Defendants filed ANTI SLAPP Motions and attorney fee motions which were granted during my noticed unavailability, as unopposed defaults. In most of these, I was not even noticed. The Apppellate Division refused to provide all designated records and transcripts, and the appeals affirmed, even though criminal offenses are not protected under the constitution.I believe my attorney THORNTON DAVIDSON was threatened,or corruptly influenced to breach his fiduciary duty.

7. **Police Complaints In India**

Two police complaints were filed in India. Case # 13697/2019 alleges fraudulent transfer of real property characterised as DLF 4109 (See Transfer deed at C,C,1022-1028). The second complaint(Case # 4982/2019),alleges theft,and misappropriation of the contents of the safe deposit box at Canara Bank(See evidence of Safe deposit box (C,947)..

8. **State Involvement & Ongoing Conspiracy - Involvement of Filing Clerks,Appellate DivisionClerks,Court Reporters ETC**

In 2013, I tried to have the Judgments voided,or enforced, or the undivided assets divided in Santa Clara. The filing clerks in Santa Clata refused to accept my evidentiary documents. This matter was reported to the administration and letters filed with the Court.ZAYNER denied my motion for lack of documentation.

In Nov 2018,I again re-filed a motion seeking to void the Judgments of 2008.The clerks refused to file the motion, the rejection letter stated that it would be to my detriment.In a phone conversation with the supervisor,I was told that someone "higher up" had directed her not to file my documents. A cmplaint was again filed with the Court.

In 2016,the filing clerks in Fresno accepted the documents presented by my process server in 15 CECG00351,but never filed them.The documents simply disappeared without a trace.

In 2014,I filed a motion for enforcement of child support arrears in Fresno.The filing clerks stated that I was to submit these to the DCSS worker on the day of the hearing. The DCSS caseworkers told me that GREEN had ordered them not to accept any documents from me. COMMISSIONER GREEN then dismissed my motion citing lack of evidence.

In 2013, Reporter Susan Petsche from Santa clara refused to provide transcripts that I requested,for appeal H040565.She and other Reporters were paid over $4,500 to provide transcripts,but failed to provide all designated transcripts for my appeals.These failures are well documented as Reporter's Board got involved in this matter.Payments of $4,500 for transcripts on Appeal H040565, and over $990 for transcripts on H044037 were never refunded.

In appeal F070938, Family Court Services refused to provide the digital recordings in lieu of transcripts of hearings in the DCSS Courts, where Court reporters are not allowed.

These seemingly random events may seem disperate, but they are all part of one continued conspiracy – to prevent me from going to trial on any matter whatsoever.

In all appeals H040565, H044037, F070938, F071888, F073777, F078293, the appellate divisions in Fresno and Santa Clara have refused to provide all of the designated records and transcripts. In July 2019,I scheduled a visit to US to secure these records, and pre-informed the filing clerks I would be arriving to access the records. Santa clara clerks refused to allow me access to the courtfile at all. In Fresno, all the files containing records related to KALEMKARIAN and the appeal F078293 were transferred to Appellate Division over my protests. I marked the remaining records for copying. Only a few had been copied. Appellate Division informed me that some of the most crucial designated records did not exist in the Courtfile. The appeal could not proceed.

In Feb 2020,I again flew to Fresno – this time unannounced.I found that certain records had been removed from the courtfile. The records were inserted when the files were returned to me after I complained.Still, the copies of DV complaints,copies of police complaints minute orders – remained missing.When I insisted,after much argument,they provided some new files,that had been previously denied to me. DV complaints were also erased from the Odyssey Case Management system[7] indiating state involvement. I was told they would copy the files for me, and mail them to me.After 4 weeks, I requested my process server to inquire. He informed me that they would not provide the records. I have a fee waiver on file,which waives the payment of copying costs.

There is a pattern of state involvement in the conspiracy to deprive me of records.

9. Current Litigation In Federal Courts

The current complaint for damages against 32 defendants was filed in the District Court in Dec 2017. Defendants filed their Motions to Dismiss under FRCP 8(a).The Court ordered the filing clerk not to file certain opposition documents and exhibits which had been lodged with the clerk. My process server mailed,along with other documents,a Motion For Preliminary Injunction,seeking the declarative relief requested in the complaint.This pleading simply disappeared. Having excluded important pleadings, and evidence,the Court then dismissed my complaint claiming that it was "frivolous" and outlandish.I filed a timely appeal in the Ninth Circuit, but did not file an AOB – my complaint was dismissed before the AOB could be filed.

WHY PERMISSION TO FILE WRIT OF CENTRIORI MUST BE GRANTED

A. Underlying Decisions,Judgements and Appellate Opinions Are Unconstitutional;

Unconstitutional Because the Underlying Judgments Are Void As A Matter Of Law

DAVILA's Court was statutorily prohibited from making child support orders by Fam 5601(a) and (e). Parties intented to settle all their claims in this agreement. If one aspect of the clai is void, the entire agreement is void. The Judgments are therefore void, and unconstitutional.

The Judgments of 2008 do not adhere to the Californian Child and Spousal Support law, Attoreny Fee related laws, and Property laws (outlined in Appendix E) They're in excess of Court's authority, therefore DAVILAwas stripped of subject matter jurisdiction. They were also

[7] They may have been reinserted since Feb 2020,after I filed documents to the effect with the Appellate Division.

based on reports of expert witnesses who had been bribed and make false representations to the Court. Defendants had engaged in extensive fraud. On this basis the Judgments are void.

All Judgments derived from the Judgments of 2008, are also void and unconstitutional. Therefore, the Orders terminating my spousal support [C,1573;1674-1684], and ordering me to pay $600 per month for children's limousine services [Judge ELFVING] are also void and unconstitutional.

KAPETAN & SIMPSON made orders against me where defendants' cognizable felonies, and indictable offenses were declared to be constitutionally protected under ANTI SLAPP. All four orders, granting protection under constitution, and granting sanctions, are void. As in *Lefabvre*,defendant KHERA and others have never contested that they have committed the alleged offenses.(*Freeman v.Schack*(2007)154 Cal.App.4th 719,733[64 Cal.Rptr.3d 867]...[*when a defendant does not show that a 'protected activity' underpins the plaintiff's claims,it is irrelevant whether the plaintiff has shown a 'probability of prevailing' on his or her claims*].)"(*Gerbosi*,supra,193 Cal.App.4th at p.445.). ANTI SLAPP legislation does not protect criminal conduct.

Other Courts have held that a void judgment does not create any binding obligation. See *Appendix E: Opinions on Void Judgments.*

COMMISSIONER DUNCAN in 2008,and again Judge GLENDA ALLEN HILL in 2014 made their orders effective Jan 3,2008 and these orders were effective until the children emancipated in 2017(C,627;1576-1613).Therefore the Feb 25,2008 order has been overturned.

Judge Drozd Orders dismissing the current complaint is void, as is the Appellate Decision seeking a statement, rather than an AOB, and consequential order dismissing my appeal. Each of these Courts was mandated to provide, or order lower court to provide the requested declarative and injunctive relief at the very least. Further, the term "frivolous" is unconstitutionally vague, and my due process rights were violated. Additionally, the Court cannot refuse to declare a void order void. The laws related to void orders are further outlined in Appendix E. Other caselaws are cited in the section titled *Petition Must Be Granted To Maintain Consistency of Decision Making*.

Centriori may be granted when inferior Court has exceeded its jurisdiction and there is no right to appeal. Appellate Court's dismissal without due process, using vague terms like frivolous, has deprived me of my right to petition and appeal. The state Supreme Court has till date refused to grant any of the various Petitions I have filed with that Court

Unconstitutional Because Judgments Against Me Are Based On, and Derived From Fraud, and Fraud Upon the Courts

By engaging in commission of fraud, bribery, perjury, fraud upon the Court. Defendant has seized my equity and then dissipating the equity in bribing various various expert witnesses, and witnesses that help him in impersonatingme, and forging legal documents. The actual Fraud also happened when the attorney engaged in wilful suppression of the material evidence that was critical to my case. Together, the attorenys, experts, KHERA engaged in material misrepresentations, perjury, and other forms of obstruction of justice as alleged.

Defendants have engaged in fraud upon the Court. [See section titled *State Involvement]*, . engaging in fraudulent conduct while executing a deliberately planned "scheme" to improperly

influence the court. [See *Browning v.Navarro,826 F.2d 335,345(5th Cir.1987)*]. Defendants have used superior courts, appellate courts as an instrument to assist in their fraud. In *Tirouda v State,No.2004-CP-00379-COA.Missisippi,2005,* the Court specifically stated : *We decline to interpret our rules so as to render the defrauded court impotent to rectify this situation.* The Court held that Justice cannot be promoted and a just determination of the action cannot be accomplished in allowing Mr.Tirouda to retain the fruits of his deceit and fraud when, in addition to the perjury, the Court was confronted with the evidence of a deliberately planned scheme to defraud the court..See *Wilson,873 F.2d at 872*. **Opinions of other circuits on fraud upon the court are contained in Appendix E.** The extensive fraud upon the Court has now made the Judgments inequitable.Other Courts have ruled that a Judgment that becomes inequitable by subsequent processes,must be vacated [See *U.S.v.Holtzman,762 F.2d 720(9th Cir.1985)*]. How is this a frivolous complaint?

Unconstitutional Because They Violate Public Policy

Public policy support adjudicating cases on merits. Legislature intended that the "important right affecting the public interest",may not be subordinated to any other considerations[*Serrano v.Priest,20 Cal.3d at 49,569 P.2d,at 1316-17*]. The Judgments and Appellate Opinions promote unconscionable conduct,fraudulent behaviour,criminal acts - and therefore violate public policy.

Delivering justice is a public affair and is done at the public expense and,therefore, should be monitored.It is the duty of all courts of justice to keep their eye steadily upon the interests of the public,and dispense justice when they find an action is founded upon a claim injurious to public." This is a public policy. [*C.J Wilmot's Opinions(Low v.Peers);377;see also Crawford & Murray v.Wick,18 Ohio St.190,204(1868)(quoting Chief Justice Wilmot).*.Here,the actions of Judicial Officers violates public policy.

California has a strong public policy in favor of adequate child support,with the interests of children the state's top priority.[*Marriage of Cheriton,(2011),92 Cal.App.4th*].Child support fraud violates public policy. A trial court cannot, as a matter of law, uphold an agreement which violates public policy on two fronts; first, the polestar legal issue of a child's best interests and secondly, the legal doctrine that the right to child support belongs to the child, not to the parent. [*E.C. v. C.W., decided on February 25, 2015]*

Section 1 of the Civil Rights Act of 1866§ 1,42 USC 1981(1988) includes the responsibility of government to prevent crime,and to remedy and punish it after it occurred.Prevention of any and all crime is a matter of great public interest and of safety and security of every citizen of United States.

Judgments of 2008,C,598 are formal ratification of the Marital Settlement Agreement(MSA) which is essentially a contract.Agreements that lead to prohibited acts or agreements between parties that were intended be used as preparation for an unlawful act of depriving me of my property and other rights violate public policy because even though the agreement may be deemed lawful,the underlying intention makes the agreement contrary to public policy [*Evert v.Williams .[1983] 9 L.Q.R.197(Eng.)].* Illegal contracts violate public policy, and are unconstitutional. The contract was further modified without my permission or approval,which makes it a candidate for vacation.Policy considerations are imposed on contract law ex ante,when parties are contracting;and ex post,when there is a dispute about the contract. Judgments of 2008,[C,598] are premised on an oral agreement which was later altered by

KHERA et al,and ratified by Defendant DAVILA.A Judge's effort to coerce parties to modify an existing contract,or alter an oral agreement between parties constitutes ex post duress(See Transcript C,695-725 v.App C.p.598).

Illegal contracts are void,voidable and unenforceable.Civ Code 1550 states that the "*the object of the contract must be lawful*" ie it must not be in conflict either with express statutes or public policy [*Strauss v Bruce(1934) 139 CA 62,66,33,P.2d 71*].

Unconstitutional Because They Violate Civil Rights

District Court and Appellate Court's dismissals of appeal,also represent deprivation of my First,Fourth, Fifth,Eighth,and Fourteenth Amendment rights under color of law/statutes. The state court actors had previously conspired to deprive me of these rights, hence the complaint. The contention that a conspiracy existed which deprived the petitioner of rights guaranteed by federal law makes each member of the conspiracy potentially liable for the effects of that deprivation[*Taylor v.Gibson,529 F.2d 709(5th Cir.1976)*] "*Counsel and her clients have a right to present issues that are arguably correct,even if it is extremely unlikely that they will win ....[A claim] that is simply without merit is not by definition frivolous and should not incur san [ctions.Counsel should not be deterred from filing such [claims] out of a fear of reprisals.*"(*California Teachers Assn.v.State of California(1999) 20 Cal.4th 327,340,975 P.2d 622,84 Cal.Rptr.2d 425,quoting In re Marriage of Flaherty(1982) 31 Cal.3d 637,650,183 Cal.Rptr.508,646 P.2d 179*.)

The District Court and Appellate Courts found the allegations to be frivolous,despite the plethora of evidence that had been submitted.The evidence was submitted but excluded by both Courts,and the exclusion made the allegations seem implausible. It has been an **invited error** caused by court's own actions. Discriminatory practices and bias during adjudication process, as shown by Judicial defendants towards women of ethnic culture is injurious to the victims subjected to such illegal processes.The limitations inherent in the requirements of due process and equal protection of the law extend to judicial as well as political branches of government,so that a judgment may not be rendered in violation of those constitutional limitations and guarantees.[*Hanson v Denckla,357 US 235,2 L Ed 2d 1283,78 S Ct 1228*]."[p]rocedural due process rules are meant to protect persons from the mistaken or unjustified deprivation of life,liberty,or property." *Carey v.Piphus,435 U.S.247,259(1978)* cited in *Mathews v.Eldridge,424 U.S.319;344(1976).*Here,all these ethical and legal requirements were violated.

Every person is entitled to an opportunity to be heard in a court of law upon every question involving his rights or interests,before he is affected by any judicial decision on the question.(*Earle v McVeigh,91 US 503,23 L Ed 398*).The due process clauses are to be determined in the context of the individual's due process liberty interest in freedom from arbitrary adjudicative procedures.

The Supreme Courts have traditionally accepted Petitions for Review in cases where deprivation of civil rights under color of law has been involved.Procedural due process is a fundamental right,is flexible and calls for such procedural protections as the particular situation

demands,and applies equality to all citizens[*Morrissey v.Brewer,408 U.S.471,481*],and it imposes constraints on governmental decisions which deprive individuals of "property" interests within the meaning of the Due Process Clause of the Fifth Amendment or Fourteenth Amendment[See *Braxton v.Municipal Court[S.F.No.22896.Supreme Court of California.October 4,1973.In People v Ramirez[Crim.No.20076.Supreme Court of California.September 7,1979*].

Lastly, each person, especially each Judicial Officer had the ability, authority and power to prevent the crimes perpetuated by defendant KHERA against me in the last 18 years. Each Judicial Officer intentionally chose *not* to prevent the crime. (See 42 USC 1986)

Section 1 of the *Civil Rights Act of 1866*§ 1,42 USC 1981(1988) expressly secures the rights "to sue [and] be parties." – a right that I have repeatedly been deprived of. In addition to procedural rights,the substantive right to a remedy for injuries is protected by the guarantee of "full and equal benefit of all laws and proceedings for the security of person and property". "*The very essence of civil liberty certainly consists in the right of every individual to claim the protection of the laws,whenever he receives an injury.One of the first duties of government is to afford that protection.*" [*Marbury v.Madison,5 U.S.(I Cranch) 137(1803*)].Protection is a substantive right of citizenship under the Privileges or Immunities Clause.It is implicit in the injunction that **no person should be deprived of** life,liberty,or **property without due process of law** – the due process, and equality that I was clearly denid for the past 17 years as defendants prevented each and every matter from being tried. The Equal Protection Clause mandates that the **protection afforded to a state's citizens be equal to all**.[See *Corfield v.Coryell,6 F.Cas.546(C.C.E.D.Pa.1825*) recognizing "[*p]rotection by the government" as a fundamental right of citizenship on a par with the rights to life,liberty,and property*].

Using ANTI SLAPP motions to arbitrarily dismiss complaints denies the opposite party opportunity to allege additional facts justifying trial of factual issues.Depriving him of his right to a fair trial,the procedure falls outside the curative provisions of California Constitution,Article VI,section 13.(*Callahan v.Chatsworth Park,Inc.(1962) 204 Cal.App.2d 597,610 [22 Cal.Rptr.606]; see Spector v.Superior Court(1961) 55 Cal.2d 839,844 [13 Cal.Rptr.189,361 P.2d 909]*.

The fourth, fifth and fourteenth Amendment to the United States Constitution prohibits a state from depriving any person of property without due process of law.This mandate has been interpreted to require "absent a countervailing state interest of overriding significance,persons forced to settle their claims of right and duty through the judicial process must be given a meaningful opportunity to be heard."(*Boddie v.Connecticut(1971)401 U.S.at p.377[28 L.Ed.2d at pp.118-119].* I was deprived of these rights by the dismissals of my complaints and motions.

Meaningful opportunity to be heard constitutes a due process right that pro se litigants clearly have [*Logan v.Zimmerman Brush Co.,455 U.S.422,437(1982)*.See also *Little v.Streater,452 U.S.1,5-6(1981)].* **These rights constitute a property under federal law**.To be able to successfully present evidence,and cross examine witnesses,to appeal a Superior Court decision is a "protected interest" The courts have held that a civil litigant's constitutionally protected

interest is in a meaningful opportunity to be heard.A meaningful opportunity to be heard is a core due process value.If one cannot proceed at all,one clearly has lost more than simply the damages or the injunctive relief sought because the meaningful opportunity to be heard is itself a protected interest[*Zeigler and Hermann,47 N.Y.U.L.Rev.at 205-06(cited in note 2)(pro se litigants deserve fair and efficient screening of their claims*)].

Additionally,Courts have found that people have a right to be free from retaliation.The 10th Circuit has held that no objectively reasonable government official would think that he can retaliate against a citizen for [enforcement of his] rights [*Robbins v Wilkie 433,F3d 755(10th Cir,2006)].* The reported threats of retaliations,which were successfully executed by attorneys and Judicial officers,make the 9th Circuit decision to dismiss my complaint unconstitutional.

> "[p]rocedural due process rules are meant to protect persons not from the deprivation,but from the mistaken or unjustified deprivation of life,liberty,or property." *Carey v.Piphus,435 U.S.247,259(1978).* [P]rocedural due process rules are shaped by the risk of error inherent in the truth-finding process as applied to the generality of cases.[*Mathews v.Eldridge,424 U.S.319,344(1976)]*

The witch hunt against me by judicial officers represents a conscious shocking behaviour prohibited by substantive due process rights [*Limone v.Condon,372 F.3d 39,44-45(1st Cir.2004)* [8]]. Deprivation of rights under color of law is a cognizable offense under 42 USC 1983,42 USC 1985,and 42 USC 1986.

The cumulative sanctions of over $300,000 by various Judicial Officers when all I wanted was appropriate and timely support,equaitable division of property,and attorney fee as per the law represent violation of my eighth amendment right. Judicial coercion,sanctions,attorney costs,fee as a means to silence women and children into compliance,without a determination whether the party is capable of paying these fees,fines,penalties,represents a due process violations.Any orders awarding excessive fines,penalties,sanctions represents a violation of the Eighth Amendment rights.

> *Protection against excessive fines has been a constant shield throughout Anglo-American history for good reason: Such fines undermine other liberties.They can be used,e.g.,to retaliate against or chill the speech.[Timbs v Indiana,No.17-1091(U.S.Feb.20,2019) Pp.3-7]*

I have been singled out for misconduct because I am a woman from a third world country and therefore purportedly not deserving of the same constitutional guarantees. Such discriminations against me and other women of my kind,are arbitrary,and prejudicial. The right to honest services of the govt officials is also a right protected under the constitution. The actions of the state actors have deprived me of the honest services of the Court (See section titled *State Involvement*).

Once the *Protected Interests* are identified,courts must then determine how much process is due the civil pro se litigant.This test requires consideration of three factors and[*Mathews v.Eldridge*]:

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[8] "evidence that [the plaintiff] was investigated, prosecuted, suspended without pay, demoted and stigmatized by falsely-created evidence" reflected conscienceshocking behavior prohibited by substantive due process *[Limone v. Condon, 372 F.3d 39, 44-45 (1st Cir. 2004)]*

1.The private interest that will be affected by the official action;

2.The risk of an erroneous deprivation of such interest through the procedures used,and the probable value,if any,of additional or substitute procedural safeguards;

3.The Government's interest,including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail.if the cost of such error is less than the cost of reducing the error,then efficiency considerations tell us to tolerate the error.[*Carroll Towing,159 F.2d at 173.Posner,Economic Analysis of Law at § 21.1 at 517-18(cited in note 121)]*

Liability claims against such deprivations are generally filed under 42 USC 1983,42 USC 1985 (2), 1985(3), 42 USC 1986.

Defendant KHERA,and his cohort of wrongdoers,have cheated me of over $6m in support,and property.The courts have held that the pro se civil litigant's constitutionally protected interest is in a meaningful opportunity to be heard.The private interests test is in favor of the petition being granted.

The risk of the erroneous deprivation of the interest is significant with state courts refusing to provide designated records and transcripts to pro se litigants – which affects their ability to perfect an appeal,thus affecting their right to be meaningfully heard.Substitute safeguards – filing a legal malpractice suit against my attorney,or a suit for damages against the KHERA and co-conspirators have already been attempted but have failed as each was similarly,arbitrarily dismissed. There are no other procedural or additional safeguards except this Centriori.

Given the unconstitutionality of the vague District Court decision which are vague, and the unconstitutionality of the underlying decisions from State Courts,government interests lie in clarifying the terms "frivolous" further thru the Centriori.

Complaint alleges tax fraud,money laundering,forgery,bribery,immigration fraud - these are crimes against the United States.Deterring such crimes in the future are decidedly in government interest.

Arresting feminization of poverty thru such rule making precedents,and to promote the goals of CSRA,and the laws relating to protecting of the family and civil rights of the vulnerable minority,women and children,are matters of policy and material interest to the government.

Issues of international comity also involve matters related to cultural sensitivity.Promoting cultural awareness and sensitivity in judicial settings thru such lawmaking role are of government interest.

Other intangibles are the issues of international comity,public policy considerations,prevention and punishment of crime,principles of justice,and deterrents to prevent wrongful behaviors.

Government interests are neither advanced thru promotion of a string of unconstitutional,unenforceable Judgment,nor by denial of my civil rights.Therefore the government's financial,judicial and other interests are protected by granting the petition.

The cost of granting the petition is significantly less than the cost of alleged error,which favors granting of the centriori. In addition,the law should presume that the government's interest in ensuring court access outweighs the government's interest in the reduction in subsequent

litigation because the government is committed to ensuring that litigants have their day in court.Therefore the test favors granting of this petition for centriori.

Even if any of the Courts claim to have exercised their discretion,all discretion was to be exercised in furtherance of justice,to promote public policies,and public good [People v.Beasley,5 Cal.App.3d 617,637[85 Cal.Rptr.501]. Judicial officers failed to do so due to their personal belief system, personal agendas,and biases. Defendants are guilty under 42 USC 1983, 1985(2) and (3), and 1986.

Unconstitutional Because They Are Vague

In state as well as federal courts,the Courts have used the term "frivolous" and "outlandish" to deprive me the protections of due process clauses of Fifth Amendment and Fourteenth Amendment (viz procedural due process,substantive due process,a prohibition against vague laws,and as the vehicle for the incorporation of Bill of Rights).The fundamental right of procedural due process applies equally to all citizens.Foreclosure on any grounds – including grounds of frivolous, outlandish - that disregards the merits of the case,violates these constitutional rights.[*Braxton v.Municipal Court[S.F.No.22896.Supreme Court of California.October 4,1973*].

The due process clauses of Fifth Amendment and Fourteenth Amendment also provides protection against vague laws.Dismissing a case for "frivolity" or "outlandishness," falls under the void-for-vague umbrella.To qualify as constitutional,the law must State explicitly what it mandates,and what is enforceable,and potentially vague terms must be defined.The term "frivolous" and "outlandish" are unconstitutionally vague,a normal person would not know exactly what that means.In *FCC v.Fox Television Stations,Inc(2012),*the court ruled that since the words "obscene","vulgar","profane",and "indecent",were not accurately defined by the FCC,it was unconstitutionally vague to enforce the restrictions against "obscene","vulgar","profane",or "indecent" acts since any person may see different things as obscene,vulgar,profane,or indecent.In the same way,the terms "frivolous" and "outlandish" belies concrete understanding, because Judge Drozd explicitly ordered the filing clerk to exclude the pleadings from records and the exhibits that had been filed, and the Appellate Court struck the evidence presented thru the Request for Judicial Notice. **It was an invited error.**

Unconstitutional Because They Are Unenforceable

Judgements of 2008 are effective from Feb 25, 2008. However, Child Support orders from Judge ALLEN HILL, made in 2014, are effective Jan 3, 2008(C,627;1576-1613), ie the order predates Judgments of 2008, and has been accepted by Fifth Appellate District, as well as by KHERA. Therefore, child support portion cannot be enforced.

Judge ZEPEDA overturned the child custody portion of the order, therefore KHERA no longer has 31% or 50% custody as ordered by Judge DAVILA on or around Feb 25, 2008. On this basis also, the Judgments are unenforceable. KHERA has refused to co-operate in helping me get taxed at my rates, as ordered under Judgments of 2008. He sold my assets, paid tax at his rates, and then refused to provide details, and declarations to help me apply for tax refunds. Instead, he claimed my tax refunds every single year. This part is also unenforceable. Khera never paid childcare, medical expenses, and the damage to my career due to his non compliance is done. The childcare, medical portion of the agreement cannot be enforced.

Children are emancipated now, and were never able to enjoy the lifestyle of their father. The damage to their psyche, due to lack of timely medical and psychological resources, education, and extra curricular activities cannot be undone. They can't NOW claim tutoring expenses etc. In that respect, the Judgment is unenforceable. Despite agreeing to guideline support during the oral agreement, DAVILA granted $2,680 as fixed support, which is not guideline support. Thereafter, KHERA litigated for 8 more years, demanding *Ostler-Smith* support, refusing to accept guideline support. On this basis, KHERA himself violated the agreement. The agreement for guideline support cannot be enforced anymore.

The fraudulent and fake bank, brokerage accounts, and properties that were purportedly awarded to me, do not exist. Therefore the Judgments cannot be enforced. KHERA has since undergone a second divorce and the jewellery stolen from my Safe Deposit Box by his wife, cannot be restored. KHERA has had a windfall. He has enjoyed the income from each of the assets that he controlled for over 18 years. If these assets are assigned to me now, the outcome would be inequitable, as some of them have been in loss, some have fines and penalties etc. Other assets have been money churners, and KHERA has pocketed that money. Therefore it would be inequitable to enforce the Judgments. Such unconscionable, unenforceable Judgments are unconstitutional.

Unconstitutional Because They Reward & Promote Crime, Criminal Conduct, Malicious Prosecution and Abuse of Process

International Crimes,Money Laundering,Immigration Fraud, Aiding & Abetting and RICO violations

Tax fraud and rampant money laundering gives Indian men an unintended,undue,illegal advantage over their US counterparts.The complaint alleges money laundering,tax evasion and immigration fraud which are direct crimes against United States.The alleged Fraud upon the Court,deprivation of civil rights under color of law,conspiracy,racketeering activities etc that interfere with or obstruct lawful dispensation of justice by deceit,craft,trickery,or other dishonest means,also represent crimes against the United States.

Defendants interfered with the lawful practices of Department of Child Support Services,IRS, immigration services and state and DCSS courts, unlawfully interfering,to hamper the DCSS,IRS,Immigration, Courts from performing its duties,represent crimes against United States. A collective criminal agreement—[a] partnership in crime—presents a greater potential threat to the public than individual delicts(*Iannelli v.United States,420 U.S.770,778(1975),quoting Callanan v.United States,364 U.S.587,593-94(1961) – Also see Hammerschmidt v.United States,265 U.S.182(1924)].*

Those activities which defraud the United States under 18USC 371 affect the government in at least one of three ways:(1) They cheat the government out of money or property;(2) ***They interfere or obstruct legitimate Government activity***; or(3) ***They make wrongful use of a governmental instrumentality***." *[§ 923,18USC 371—Conspiracy to Defraud the United States,U.S.Department of Justice's United States Attorneys' Manual.*]

The "intent required for a conspiracy to defraud the government is that the defendant possessed the intent(a) to defraud,(b) to make false statements or representations to the government or its agencies in order to obtain property of the government,or that ***the defendant performed acts or made statements that he/she knew to be false,fraudulent or deceitful to a government agency,which disrupted the functions of the agency or of the government.***" [§ 923,18 U.S.C.§ 371— Conspiracy to Defraud the United States,U.S.Department of Justice's United States Attorneys' Manual].

KHERA et al have engaged in each of these,in false,fraudulent,deceitful communications not just in this divorce proceeding,but also in tax and immigration areas,which has impeded with legitimate govt functions.The federal courts have held that an "*actual loss to the government of any property or funds*" is not an element of the offense; to secure a conviction...*only that the defendant's activities impeded or interfered with legitimate governmental functions*." [§ 923,18 U.S.C.§ 371—Conspiracy to Defraud the United States,U.S.Department of Justice's United States Attorneys' Manual]. Defrauding me of court ordered child support,and wrongful termination of spousal support has lead to my bankruptcy and may lead to discharging of the debts owed to the State and Federal governments.These are indirect ways in which defendant KHERA has defrauded the United States.(C,693-694) .
When Judicial Officers grant attorney fee amounts that represent obviously fraudulently inflated bills, but deny a genuine attorney fee award for custody related litigation to a single mother, one cannot deny the allegations of racketeering[9].

These, and other criminal acts, including mail, wire, bank fraud, bribery, have been properl alleged under RICO, in the complaint, and in the Statement filed with the Appellate Court. Also see section titled **Law** for additional caselaws from other circuits.

Fraud Upon the Court

Attorneys and expert witnesses engaged in extensive fraud, misrepresentation, bribery, forgery, and conspiratorial behaviors in the family law matters in Fresno, as well as in Santa Clara

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[9] While in US,I was unable to pay children's medical expenses at Children's Valley Hospital,and my own medical bills.I was forced to seek lunch subsidies,and MediCal services for children in 2014 and 2015,even though defendant KHERA earned over $800,000 at the time.He had been ordered to pay medical expenses but failed to pay.These burdens imposed on the state represents attempts to defraud the State government,as well as the United States.
I also have unpaid study loan from FAFSA.Since all my personal funds had to be diverted to children's welfare,I was unable to pay instalments,and the loan continues to be deferred. After 20 years,or thru bankruptcy,it may be automatically waived.Therefore,defendants' fraudulent actions have resulted in defrauding not just me,but also the federal and private lenders of FAFSA. Per the definition,the alleged acts of the attorney defendants,and the Judicial defendants are also crimes against the United States under 18USC 371,18USC 1346.
The deceit,trickery,dishonest and unethical means adopted by them,the alleged fraud upon the court,conspiracy,racketeering activities,bribery,forgery,witness tampering etc,also fall under the gamut of crimes against the United States [*Breuninger,Kevin(2018-02-23)."Former Trump campaign official Rick Gates pleads guilty to lying and conspiracy against the US".CNBC.Retrieved 2018-02-23; Polantz,Katelyn(2018-09-14)."Paul Manafort pleads guilty and agrees to cooperate with Mueller investigation".CNN.Retrieved 2018-09-14; For bribes and kickbacks see Skilling v.United States ,561 U.S.358(2010).*

County. As a consequence, the Courts were unable to perform their judicial functions appropriately.

When fraud was discovered, instead of addressing these issues, a string of Judicial Officers then engaged in 12 years of covering up the fraud, with reckless disregard for law, justices, and my injuries. They have continued to do so till date, despite the Federal suit for damages. Defendants have enlisted the help of state actors, like court reporters, filing clerks, attreny general's office, to conceal their offenses. The appellate Court has not removed unmoved, and a clear indication of the involvement of Appellate Courts came when they held that the indctable criminal offenses of the defendants were constitutionally protected acts, when common sense, and a string of caselaws, dictate otherwise.

DAVILA's acts of threatening attorneys, intentionally usurping jurisdiction,to make unlawful orders against me that violate state,federal and constitutional laws,and subsequently wilfully defending those orders made in clear absence of jurisdiction,threatening attorneys forcing them to breach their fiduciary duties towards their clients represents fraud upon the court.Judicial defendants wrongful use of judicial machinery and authority to engage in conspiracy,to *intentionally* deprive me of justice,with the intent to conceal the alleged criminal conduct of defendants and unlawfully protect them from liability,also represents fraud upon the court.The wilful failure of the Appellate Division to provide designated records and transcripts on appeal represents state involvement in the alleged fraud upon the court. Judicial power is never exercised for the purpose of giving effect to the will of the Judge; always for the *purpose of giving effect to the will of the Legislature; or,in other words,to the will of the law." [Osborn et al.v.The Bank of the United State(1824,U.S.) 9 Wheat.738,866.*].Government interests must be aligned with the will of the law.This criteria also favors granting the petition. I am not the only person alleging Judicial misconduct against seveal of these Judicial Officers[10] See https://www.mercurynews.com/2012/06/29/loss-of-trust-san-jose-man-battles-trustee-court-system-to-preserve-life-savings-2/.

Attorney & Judicial Misconduct

Tresspassing, vandalism, threats (including murder threats), intimidation, stalking, harassment, child abduction, money laundering, blackmail, extortion, domestic violence were used as weapons by one or more defendants, to intimidate me into giving up my rights.

Defendant PARDUE informed me that Judge DAVILA had threatened and intimidated him. Later, MORENO et al also alleged that DAVILA/ZAYNER had threatened them. I believe THORNTON DAVIDSON and my current attorney Kim Aguirre are being threatened or corruptly influenced by Judicial Officers to breach their fiduciary duties towards me. In each of these cases, my claims were arbitrarily extinguished, without allowing me my day in the court.

[10] ZAYNER, for example, has also been linked to the recent college cheating scandal and implicates him in a criminal medical fraud scam involving Stanford University hospitals. A criminal investigation is now underway to see if Zayner used his power and position as an elected judge to rig probate and divorce cases as well as civil cases involving Medicare Fraud and antitrust activity in the area's medical industry. A review of Zayner's family law and probate cases show Zayner, through his associations with the Inns of Court, provided favors and favorable rulings to lawyers with a Stanford degree. In the county's divorce, probate and conservatorships, Zayner allowed court fiduciaries and private judges to take over money management of the elderly and disabled in a manner that resulted in the conversion of estates to Zayner's closest Stanford University buddies. The schemes and artifices alleged in my complaint against Judicial Officers are not frivolous.

Such repeated patterns of behaviour would be a violation of Model Code of Judicial Conduct which requires a judge to "*respect and comply with the law,*' [Canon 3B(7)] to "be faithful to the law and maintain professional competence in it,"[Canon 3B(2)] and to "accord to every person who has a legal interest in a proceeding,or that person's lawyer,the right to be heard according to law." [Canon 3B(7)].

If the Judicial Officers are ignorant of family court laws, it would be incongruous if the principle "*ignorance of the law is no excuse"* applies to everyone but those charged with interpreting and applying the law to others.Thus,while mere legal error does not constitute misconduct,*"[j]udicial conduct creating the need for disciplinary action can grow from the same root as judicial conduct creating potential appellate review...."[In re Laster,274 N.W.2d 742,745(Mich.1979)public reprimand for judge who granted large number of bond remissions originally ordered forfeited by other judges):*

The inherent authority of Canon 3D encompasses power and a duty to discipline officers of the Court who violate CRPCs and other rules of professional conduct expected of the "officers of the court" [*Couch v.Private Diagnostic Clinic,554 S.E.2d 356,362(N.C.Ct.App.2001](citing In re Hunoval,247 S.E.2d 230,233(N.c.1977)).''we hasten to approve and encourage courts throughout this state in their efforts to halt unprofessional conduct and meet their responsibilities in reporting violations of the Code [Mentor Lagoons,Inc.v.Rubin,(1987) 510 N.E.2d 379,382]. "The reliability of lawyers' representations is an integral component of the fair and efficient administration of justice.The law should promote lawyers' care in making statements that are accurate and trustworthy and should foster the reliance upon such statements by others." [Fire Insurance Exchange v.Bell by Bell,643 N.E.2d 310(Ind.1994)].* Several motions, complaints were filed seeking sanctions, damages against the clearly felonious conduct of the attrneys. Each Judicial Officer – whether in the Superior Court,or Appellate Court – refused to act. Complaints to Judicial Commission fell on deaf ears. Instead,I was arbitrarily sanctioned to an amount of over $300,000 over the years – an effort to unlawfully threaten and silence me.

> *"[j]udicial independence does not equate to unbridled discretion to bully and threaten,to disregard the requirements of the law,or to ignore the constitutional rights of defendants [In re Hammermaster,985 P.2d 924(Wash.1999)censure and six-month suspension without pay)].*

Assuming arguendo that disciplinary procedures may not constitutionally be used as a substitute for appeal, unethical conduct that "*plainly goes well beyond judicial acts is realistically susceptible of correction through the avenues of appeal,mandamus,etc."[McBryde,264 F.3d at 68]. McBryde Court* held:"*we are all at a loss to see why those should be the only remedies,why the Constitution,in the name of 'judicial independence,*' can be seen as condemning the judiciary to silence in the face of such conduct[11].The court concluded,*"we see*

[11] *The court described one instance in which the judge had ordered a lawyer to attend a reading comprehension course when she failed to have her client attend a settlement conference as required by the judge's standard pretrial order. The court noted: Appeal is a most improbable avenue of redress for someone like the hapless counsel bludgeoned into taking reading comprehension courses and into filing demeaning affidavits, all completely marginal to the case on which she was working. Possibly she could have secured review by defying his orders, risking contempt and prison. Id. at 67-68.*

nothing in the Constitution requiring us to view the individual Article III judge as an absolute monarch,restrained only by the risk of appeal,mandamus and like writs,the criminal law,or impeachment itself."

Judge Drozd's dismissal of my complaint alleging frivolity must be read in context of the following:

> Judge Drozd,promotes a philosophy of "*Judicial Independence" where the judiciary subjugates other branches and is unaccountable even for the most egregious usurpations of power.In 2006,Judge DROZD made at least seven speeches on the topic of "judicial independence," claiming,among other things,that judges should not be accountable for their decisions.He confirmed in writing to the senate Judiciary Committee Chairman,Charles Grassley,that judges are unaccountable for activist rulings.Chairman Grassley asked Judge Drozd to explain his views on the topic of "judicial independence." Judge Drozd claimed that judges should be able to issue even the most abusive orders "without any ... concern of reprisal for judicial acts." His statements and beliefs are absolute, leaving no exception for even the most destructive attempts by judges to usurp legislative power.By this measure,judges could literally re-write the constitution by judicial fiat and escape corrective remedy.* ..[https://rodmartin.org/open-letter-opposing-theconfirmation-judicial-nominee-dale-drozd/ Retrieved from internet,2018]

In *Slavin v Curry,574 F.2d 1256(5th Cir.1978),*the Court stated:

> *"A judge cannot allow the personal view that the allegations of a pro se complaint are implausible to temper his duty to appraise such pleadings liberally." Citing, Cruz v.Skelton,the Court went onto say that, "a § 1983 complaint should not be dismissed unless it appears that the plaintiff can prove no set of facts which would entitle him to relief.Conley v.Gibson,1957,355 U.S.41,78 S.Ct.99,2 L.Ed.2d 80.The allegations of the complaint,especially a pro se complaint,must be read in a liberal fashion."*

These acts represent an ongoing pattern of judicial misconduct,falling under 18USC 2,18USC 3,18USC 4 and 18USC 2383.

Attorney Misconduct The conduct of the attorneys over the past 10 years has been repetitive,a "normal" way of doing business for them.When an attorney is threatened by a Judge,he is free to complain to the Commission of Judicial Performance,which these attorenys failed to do.If the Judicial Officers did not threaten them,then they simply attempted to deceive me to get me to comply with their demands,and they should have been disciplined by DAVILA,ZAYNER,and others - under B&PC 6104,B&PC 6106,and B&PC 6068 etc.

"The trial court's discretion is not absolute: 'The discretion intended...is not a capricious or arbitrary discretion,but an impartial discretion,guided and controlled in its exercise by fixed legal principles.It is not a mental discretion,to be exercised ex gratia,but a legal discretion,to be exercised in conformity with the spirit of the law and in a manner to subserve and not to impede or defeat the ends of substantial justice."(*Bailey v.Taaffe(1866) 29 Cal.422,424.*). Judicial power is never exercised for the purpose of giving effect to the will of the Judge; always for the *purpose of giving effect to the will of the Legislature; or,in other words,to the will of the law." [Osborn et al.v.The Bank of the United State(1824,U.S.) 9 Wheat.738,866.*].Government interests must be aligned with the will of the law.This criteria also favors granting the centriori.

Dismissal of my complaints,appeals,and impositions of arbitrary fines are meant to discourage me from seeking appropriate,timely support,equitable property division,support,attorney fee,but especially damages for my injuries and losses.Such fines and penalties would be rejected and patently unnecessary in any civilized society that was free from the alleged racketeering enterprise[See *Timbs v.Indiana,586 U.S(201); Furman v.Georgia,408U.S. 238(1972)].*Each state Court *has intentionally failed to prevent the alleged ongoing crimes against me.Such acts constitute violations under 42 USC 1986.*

RICO Violations

Congress enacted RICO to reach white collar crime. Complaint alleges that a significant number of attorneys,and judicial officers are members of the alleged racketeering enterprise. Merely belonging to an enterprise is not by itself a crime [*United States v Castilano(1985,SE NY) 610 Fed Supp 1359]* until members conspire to commit a crime.

RICO elements are adequately plead in the complaint. Other Circuit Courts have found that Public officials are not immune from RICO actions even if governmental entities could not be charged as the enterprise.The corrupt governmental officials might themselves be charged as a criminal association in fact enterprise [*Turkette Supra,699,F2d,at 1148*]. Government agencies,courts,political offices may constitute an enterprise.Among the government units held to be enterprises are offices of governors,states legislatures,courts,court clerk offices,police,sheriff's departments,county prosecutors office,tax bureaus,wardens of prisons.There are greater than 30 reported cases holding that a government entity may be an enterprise [United States v Thompson,685,F2d,993 999(6th Cir,1982); United States v Freeman,6 F3d 586 596-597(9th Cir,1993 – offices of CA 49th Assembly District); United States v Alonso,746,F2d 862,870(11th Cir,1984) – homicide section of Dade County,Public Safety Deptt); United States v Ambrose,740,F2d,505,,512,(7th Cir,1984) Police dept; United States v Davis,707,F2d,880,882-883; United States v Thompson,6th Cir,1982 – Tennessee Government Office etc etc; United States v Frumento,*405,F Supp,23,29-30(E.D Pa 1975) aff'd 563 F2d 1083(3rd Cir,1977),Cert denied 434,US 1072(1978)*.The *Frumento* decision is consistent with RICO's purpose of ridding the nation's economic life of the "cancerous influences of racketeering activity".Government enterprise may itself be a group of individuals associated in fact "rather than a legal entity within 1961(4)[*United States v Stratton,694 F2d,1066,1075(5th Cir,1981); United States v Baker,617,F2d,1060(4th Circuit,1980).*

Structure of the alleged enterprise shows purpose,relationships among those associated,longitivity to permit associates to pursue enterprise purposes.The complaint establishes all these elements of the RICO allegations.The Schemes and Artifices are alleged in the complaint. Three new schemes have been added to the mix, to obstruct justice. They represent a pattern across counties and courts. First is the scheme of stacking. The state courts stack the deadlines and demand I file several appellate briefs within a short period of time[12],

[12] I informed the Appellate Court that I was filing Petition for Centriori with the Supreme Court of US. I expected that I would be granted more time on the appellate brief. It had an opposite effect. Immediately, as if on cue, I was told to file two briefs F078293, and F074544. My requests for extension of time were denied. When I wasn't able to do this, F074544 was dismissed, the Opinion on F073777 was released, and I had to file the Petition for Rehearing within 15 days, and then a Petition for Review with Supreme Court within 15 more days. Appeal H046694 also ruled suddenly at the same time – after a period of 12 months. I believe these were efforts to prevent me from filing this petition.

which deadline no reasonable person would be able to meet. My failure to meet these deadlines is then used to arbitrarily dismiss my appeals. Second is the scheme to deprive me of designation records and transcripts on appeal. In the absence of these records and ranscripts, my appeal is doomed. Third is to ignore the questions of law raised in the appeal, fabricate facts that are non existant, and use these fabricated facts to affirm.Such actions are violations of honest services under 18USC 1346.The complaint alleges and the evidence establishes that the enterprise has existed for more than 10 years (longitivity). It provides several dozen predicate acts – not just 2 – conducted by each defendants, over a period of 1-4-10 years between 2005 - 2015.Mail and Wire fraud in this case,present predicate acts on which the RICO conspiracy is contingent.The defendants corresponded with me thru mail and thru internet. There have been additional predicate acts of obstructing justice committed since 2015,showing the ongoing nature of conspiracy.

Conspiracies,or attempts to commit crimes listed in 18USC 1961(A),(D) are proper RICO predicate acts [*Battlefield Builders v Swargo,743 F2d 1060(4th Cir,1984 – attempt); United States v Ruggiero,726 F2d 913,919(2nd Cir) 469 US 831(1984)].* 9th Circuit prefers to frame the inquiry as to whether the acts were isolated,or sporadic,on the one hand,or whether the are indicative of a threat of continuing actively on the other hand [*Medillion TV Centres v Selec TV of California, 833 F2d 1360 1365(9th Cir,1987)].* Here,the acts of the private defendants,state actors present a threat of continuity.No one has exited the conspiracy.

Even though there is no direct written agreement that evidences conspiracy between the defendant,his attorneys,and my attorneys,and the judicial officers,the agreement to conspire may be shown by circumstantial evidence that tends to show a common intent [*Peterson v Cruickshank(1956) 144 Cal,App.2d.148,300 P.2d 915*].The ultimate fact of the conspiracy must usually be determined from the inferences naturally and properly to be drawn from those matters directly *proved*,which indicates it is a triable offense.In this instance,the conspiracy started as a simple conspiracy to deprive me of my rights to property and support.Because Judge DAVILA made orders in complete absence of jurisdiction,he is liable for damages and losses.Since 2008,the nature of conspiracy has changed – most of the effort now revolves around preventing proceedings that would result in the Judgments made by Judge DAVILA in 2008 from being declared void. Courts have held that under RICO,one may be found guilty of conspiracy to conspire to conspire.Here,two or more people agreed to commit the alleged unlawful acts,then took steps toward its completion.Those involved in the conspiracy knew of the plan and intended to break the law,or intended to help others break the law. (conspiracy).

I have been severely injured in my person and in my business, in excess of $6m overall,over a million in spousal support,and at least $500,000 in child support.

B. Petition Must Be Granted In National Interest, To Prevent Crime,& To Promote International Comity

The Case is aligned with state and federal laws. Centriori will help in combating such extensive crime and corruption. See https://www.janeandjohnqpublic.com/blog for details of the alleged rampant corruption.Object of RICO is not meely to compensate victim, but to turn them into prosecutors dedicated to eliminating racketeering activity [*Rotella v Wood (2000)528 US 549120 S CT 1075,145 L Ed 2d 1047,2000 CDOS,1357].* Its purpose is to prevent and punish financial infiltrationand corrupt operationsof legitimate business operations affecting interstate commerce[*United States v Sutton (1979,CA6, Ohio) 605 F2d260*], and to impose enhanced sanctions on those who engage in racketeering activities [*United States v Yarbrough (1988, CA*

Wash) 852 F2d 1522].. How such a claim could be outlandish, was not explained by Judge Drozd.

Litigation related to unconstitutional orders or Judgments represents public interest litigation.When a city,state,or state employee violates its citizens' constitutional rights,any fight back by those citizens to protect their rights constitutes public interest litigation. Acts of fraud,fraud upon the court,bribery,forgery, money laundering,casefixing,conspiracy to fix cases,aiding and abetting to perform any aforementioned actions,deprivation of my civil rights under color of law,color of statute,conspiracy to deprive me of my rights under color of law,color of statutes, racketeering, when undertaken by public officials, and offices of the court represent public interest litigation. Suits alleging coercive practices depriving women and children of their constitutional guarantees represents public interest litigation.Allegations of widespread bribery of expert witnesses, rico violations, to deprive woman and children of their entitlements, unscrupulous and fraudulent attorney billing practices, and judicial involvement in these matters represents public interest litigation. Such litigation cannot be frivolous.

Certain men,like KHERA, originally from India, unjustly engage in dowry practices, which are illegal. Income earned in India by foreignnationals or overseas citizens of India, dowry income, and inheritance become non taxable events in that country. This loophole is exploited by US nationals of Indian origina, and India ends up being the venue of choice for marriages for most Indian men residing in US. Indian men invest in the Indian economy with impunity, never report this income anywhere and use this as income for asset creation purposes. Such income, along with the income from dowry, and inheritance is significant, but it goes unreported and finds an illegal tax shelter in India.To allow retention is discriminatory.

If this marriage(where the woman has had a greater financial and emotional contribution) fails,the man has a windfall – he transfers all community funds (including her income and savings) to India where they cannot be traced by the US courts, deprives her of these funds, and can marry again,repeat the process of wealth acquisition thru such illegal means, to the detriment of the wife, who is left with nothing. Often the women(like me) are not even entitled to any social security or disability benefits,having worked for less than 10 years in US.

Sleazy, immoral, unethical lawyers BENETT, BECKER, SCHREIBER and MORENO defendants specialise in working with Indian men in the cash rich Silicon Valley. It is a racket in which the woman gets robbed, the man, his attorneys, expert witnesseshave a windfall. Allowing such a racket to flourish contributes to feminization of poverty[13], and unjustly and unfairly burdens the state resources as the women and children are forced to go on welfare, when statutes clearly state that the financial needs of the children should be met through private financial resources as much as possible [Fam 4053(h)]. Therefore not only is failure to pay "appropriate and timely" support statutorily prohibited, such unjustified imbalances imposed in marital context represent fraud upon the United States because the wife, deprived of appropriate payments of support eventually burdens the state resources, while the man responsible for crime is unjustly rewarded. Therefore due process requirements become especially important

[13] Feminization of poverty is a phenomenon referring to a widening gap between women and men caught in a sequence of economic deprivation and scarcity. [*Moghadam VM (July 2005). "THE 'FEMINIZATION OF POVERTY' AND WOMEN'S HUMAN RIGHTS" (PDF). SHS Papers in Women's Studies/ Gender Research: 39;* United Nations. (1996). Resolution Adopted by the General Assembly on the report of the Second Committee (A/50/617/Add.6)

for vulnerable emigrant women, and to conserve state resources, or at least prevent them from being expended by fraud.

Given the familial structure and ground reality of Indian marriages,especially those tha involve international citizenships, the government of India has established legal procedures and laws to curtail money laundering,and to ensure that the rights of women to alimony and child support are rigidly protected. Recognizing these procedures, and augmenting them is beneficial for both countries and in international comity.

Here the parties were married under Hindu Marriage Act,and were Indian passport holders in 2008. Choice of law allows parties to take advantage of foreign jurisdictions' comparative regulatory advantages(*Posner,1992; O'Hara and Ribstein,1997*). There are foreign policy implications of ignoring and intentionally forcing the US laws on overseas citizens of India. The Hague Convention (Article 13) specifies that Contracting States may apply "rules of law more favorable to the recognition of foreign marriages [Hague Marriage Convention][14]. It would produce tax related efficiencies as well,arresting money laundering.

Failing to apply foreign laws, the Courts must devise a means to punish the offenses of money laundering, and concealment of taxable income in such illegal tax shelters. This is necessary to protect women and children, as well as to conserve state resources.

At a time when the governments of the world are joining together to battle crimes against children, money laundering, immigration fraud, District Court's finding – without investigation - that my allegations against KHERA and his cartel are frivolous, belies the most important issues facing the international community today. Indian Parliament, and US Congress have stringent laws to address each of these areas, and punish such offenses. The Judiciary must be *made* to apply the will of the Congress,or the will of the law. These aspects of the dispute must not be considered subservient to other issues. Centriori must be granted to address these issues of national interest.

C. Petition Must Be Granted To Maintain Consistency Of Decision Making Across States

This Court is required to determine if the core of the dispute,the underlying Judgments of 2008, (C,598) are legitimate,and enforceable,or if they are void as a matter of law.Subsequently,it must determine what kind of activities of secondary defendants (DAVILA,ZAYNER,KAPETAN,PARDUE,MORENOet al,MILLEN,TONE, DAVIDSON, will establish vicarious liability for tortious/criminal/conspiratorial conduct by primary wrongdoers(KHERA,BENETT,BECKER,SCHUSTER,WHITE).

Split Across States Regarding Unenforceability of Oral Agreements

Whereas ZAYNER, MCGOWEN, DAVILA, GREEN have attempted to validate the unconscionable and shocking agreement of May 17, 2008 between parties, other Circuit Courts have held that any agreement that cannot be performed without violating a statute is illegal and will not be enforced. *Dippel v. Brunozzi, 365 Pa. 264, 74 A.2d 112 (1950); Pennsylvania R. Co. v. Cameron, 280 Pa. 458, 124 A. 638 (1924); Gramby, et al. v. Cobb, 282 Pa.Super. 183, 422 A.2d 889 (1980).* Here, the illegality appears that the subject of the agreement is specifically proscribed by family law statute. [*Shafer v. A.I.T.S., 285 Pa.Super. 490, 428 A.2d 152 (1981)*].

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[14] See generally J. Thomas Oldham, Why a Uniform Equitable Distribution Act is Needed to Reduce Forum Shopping in Divorce Litigation, 49 FAM. L.Q. 359 (2015); J. Thomas Oldham, Everything is Bigger in Texas, Except the Community Property Estate, 44 FAM. L.Q. 293 (2010)

See sections titled *Child Support Laws, Spousal Support Laes, Property Laws* for details of proscribed subjects, the record concerns details of the alleged oral agreement which could conclusively indicate that the transaction was intended to circumvent the alleged laws, and lawful jurisdiction of DCSS, Fresno.

Split Across States On Matters Related to Support, Property & Fee

The Californian law is not an issue in this complaint. The problem is with enforcement of the laws. The Judicial Officers have shown reckless disregard and derision for Californian family laws, with are aligned to that of other states. They have creatd their own laws to aid and abet defendants in defrauding me. Opinions from California Courts, and from other circuit courts are outlined in Appendix E, section titled *Opinions On Child Support; Opinions on Spousal Support; Opinions on Attorney Fee; Opinions on Property Rights.* Judgments against me contradiction each of these opinions which shows that theJudicial Officers exceeded their jurisdiction.

Split Across States Regarding Conspiracy

There is nothing outlandish or frivolous in my complaint because Circuit Courts have held that the agreement between conspirators need not be proved by direct evidence and the ultimate fact of a conspiracy must be determined from those inferences naturally and properly to be drawn from those matters directly proved.(*Beeman v.Richardson,185 Cal.280 [196 P.774*] cited in *Peterson v Cruickshank 144 Cal.App.2d 148*]).

My complaint against defendants describes a conspiracy which began in Sept 2003,when defendant filed a dissolution petition,and I,inter alia,filed a motion for child and spousal support,also seeking a Temporary Restraining Order against sale,transfer,of community assets.The complaint then alleges illegal sale of community assets, securities fraud, facilitated by attorneys on both sides, and expert witnesses, violation of court orders facilitated by attorneys on both sides. Like Slavin v Curry,when read with the required liberality,my complaint relates,with sufficient specificity,facts that could entitle me to relief.[*Cf.Johnson v.Wells,566 F.2d 1016,1017(5th Cir.1978)].*

The complaint recounts a number of incidents.While they state separate causes of action against individual defendants,they also charge participation in a single conspiracy.The district court erred in treating the incidents as alleging only separate causes of action.The contention that a conspiracy existed which deprived the petitioner of rights guaranteed by federal law makes each member of the conspiracy potentially liable for the effects of that deprivation. I could conceivably be entitled to equitable relief even against those defendants who are immune from actions for damages.[*Slavin v Curry,574 F.2d 1256(5th Cir.1978)]* Given that the state officials have a motive to prevent me from having the Judgments declared void,the inferences drawn from these repeated attempts to sabotage each and every one of my effort,are not therefore frivolous.Section titled *Related Cases* reveal the efforts I have made,and those that have been thwarted,and not allowed to proceed.No state actor has exited the conspiracy. See Appendix E, section titled *Opinions On Conspiracy*

Split Across States on Matters Related To Malicious Prosecution

KAPETAN, SIMPSON unlawfully dismissed my claim of malicious prosecution against KHERA under the ANTI SLAPP stuatue. KHERA had filed a petition seeking to circumvent legitimate jurisdictional authority of DCSS, and acquired a void Judgment of 2008 from Santa Clara County without probable cause. It took over 8 years, and $220,000 to have the child

support component of the Judgments overturned. It also took an additional $50,000 to have the child custody component of that order overturned. I prevailed in both matters. The dismissal of my complaint using litigation privilege, was in excess of courts jurisdiction, and herefore unconstitutional. See Appendix E, section titled *Opinions On Malicious Prosecution*

Split Across States On Matters Related To Fraud/Fraud Upon The Court

As here, whenever any officer of the court commits fraud during a proceeding in the court, he/she is engaged in "fraud upon the court". In [*Bulloch v. United States, 763 F.2d 1115, 1121 (10th Cir. 1985)*], the court stated "*Fraud upon the court is fraud which is directed to the judicial machinery itself and is not fraud between the parties or fraudulent documents, false statements or perjury. ... It is where the court or a member is corrupted or influenced or influence is attempted or where the judge has not performed his judicial function --- thus where the impartial functions of the court have been directly corrupted.*"

7th Circuit defines it as "*that species of fraud which does, or attempts to, defile the court itself, or is a fraud perpetrated by officers of the court so that the judicial machinery can not perform in the usual manner its impartial task of adjudging cases that are presented for adjudication.* " [*Kenner v. C.I.R., 387 F.3d 689 (1968); 7 Moore's Federal Practice, 2d ed., p. 512, ¶ 60.23*]. The 7th Circuit further stated "*a decision produced by fraud upon the court is not in essence a decision at all, and never becomes final.*" The wrongful acts of the defendants were aimed at the court and have harmed the integrity of the judicial process.[*In re Levander 180 F.3d at 1119*],so that the judicial machinery cannot perform in the usual manner its impartial task of adjudging cases that are presented for adjudication.[*Appling v.State Farm Mut.Auto.Ins.Co.,340 F.3d 769,781(9th Cir.2003)].* These acts have resulted in grave miscarriage of justice [*Beggerly,524 U.S.at 47,118 S.Ct.1862,cited in Appling supra*]

Other Circuits hold that an appeal from an order based on lack of jurisdiction and fraud upon the Court is a question of constitutional law,and questions the Court's lack of ability to perform its functions in an disclosure of facts,therefore ***this kind of conduct must be discouraged in the strongest possible way***.[*Cox v.Burke,706 So.2d 43,47(Fla.5th DCA 1998)*].The allegations are not frivolous at all.Also see [*Tirouda v State,No.2004-CP-00379-COA.Missisippi,2005)*] . "fraud upon the court" vitiates the entire proceeding. [*The People of the State of Illinois v. Fred E. Sterling, 357 Ill. 354; 192 N.E. 229 (1934)* ("*The maxim that fraud vitiates every transaction into which it enters applies to judgments as well as to contracts and other transactions. "*); *Allen F. Moore v. Stanley F. Sievers, 336 Ill. 316; 168 N.E. 259 (1929)* ("*The maxim that fraud vitiates every transaction into which it enters ...*"); *In re Village of Willowbrook, 37 Ill.App.2d 393 (1962)* ("*It is axiomatic that fraud vitiates everything.*"); *Dunham v. Dunham, 57 Ill.App. 475 (1894), affirmed 162 Ill. 589 (1896); Skelly Oil Co. v. Universal Oil Products Co., 338 Ill.App. 79, 86 N.E.2d 875, 883-4 (1949); Thomas Stasel v. The American Home Security Corporation, 362 Ill. 350; 199 N.E. 798 (1935).*

District Courts have rejected federal immunity for expert witnesses by distinguishing between witness testimony, vs his participation in the alleged fabrication of evidence [*All State Insurance Co v Shah, 2018, US Dist LEXIS 101952 (D Nev June 18, 2018)].*Under federal law, when any officer of the court has committed "fraud upon the court", the orders and judgment of that court are void, of no legal force or effect.The Petition must be granted on this basis also. The complaint seeks sanctions and disciplinary actions against attorneys and judicial officers for their alleged wrongful acts. Californian Courts have held attorneys accountable for similar misconduct.[*In the Matter of Maloney and Virsik; Drociak v.State Bar(1991)52 Cal.3d 108;*

Discipline is imposed in order to protect the public by deterring future misconduct by attorneys.(*Bach v.State Bar(1987) 43 Cal.3d 848,856-857 [239 Cal.Rptr.302,740 P.2d 414]).* Other circuits hold attorneys to a much higher standard than Californian Courts do [*John Murphy v.Millard Farmer et al 3:2015cv00092 |((Georgia,Northern District); Liles v.Liles,289 Ark.159,711 S.W.2d 447(1986)]*.

Split On Matters Related To Void Judgments & Associated Liabilities

Following are the jurisdictional requirements:(1)legal organization of the tribunal; (2)jurisdiction over the person;(3) jurisdiction over the subject matter;(4)power to grant the judgment.(*15 Cal.Jur.49-55*,§§ 140-141,and cases there cited; *Hunter v.Superior Court,36 Cal.App.2d 100,112[97.P.2d 492*].None of these requirements were met when Judgments of 2008 were made. The Court was not legally authorised to make these Judgments, itlacked subject matter jurisdiction, and in matter of sanctions, it lacked personal jurisdiction. It had no power (statutorily prohibited) to grant these Judgments under Fam 5601 (a) and (e), Fam 4064.

Although KHERA alleged that all of the property was his personal property or community property,the question whether all of the property was his personal property,or community was directly an issue that needed to be tried – which DAVILA's Court failed to allow.(See *Estate of Williams,36 Cal.2d 289,292[223 P.2d 248]; Zaragosa v.Craven,33 Cal.2d 315,317[202 P.2d 73]* See C,p-71146) -two properties were not even held in joint names.One was in my sole name(C,97-98)),and one was in the name of my cousin's mother-in-law(App.C,100-102).Judgments are void if made in excess of jurisdiction,when Judgments infringe on constitutional rights,obligations and privileges.(See Opinions on Civil Right Violations,p.994).

In Dec 2014,defendant GREEN denied my motion to enforce support arrears,with prejudice,stating that arrears had been previously waived by Judge ALLEN HILL,and DAVILA(C,975-976).The denial was in excess of jurisdiction,was void for the same reasons.

Other Circuits have also held that the child support arrears may not be waived,and where waived,the orders have been vacated.[*A forgiveness or reduction of child support arrears constitutes an improper retroactive modification.*See *Robertson,266 Ga.at 517(1); see also Ga.Dept.of Human Resources v.Prater,278 Ga.App.900,902-903(2)630 SE2d 145)2006)forgiveness of past due child support arrearage is not permitted); Ga.Dept.of Human Resources v.Gamble,297 Ga.App.509,511(677 SE2d 713)2009)a trial court may not "forgive any amounts owed in arrears")].*

Termination of my spousal support by DAVILA in 2010(C,987-989) was based on the Judgment of 2008. The Appellate Opinion regarding the termination of spousal support [*Khera v Sameer(2012)]* was also derived from Judgments of 2008,[C,598]. These judgments are void.

Judgments of 2008,[C,598] do not provide a time limit for defendant KHERA to perform the acts required by him. Ninth Circuit has held that failure to set a time limit, renders a Judgment inequitable,and **failure to comply within a certain reasonable period renders the Judgment inequitable,and such a Judgment must be vacated** [*U.S.v.Holtzman,762 F.2d 720(9th Cir.1985),Id at 722*].

In 2015,defendant KAPETAN and Judge SIMPSON made a series of unopposed,default Judgments against me during my noticed unavailability while I was relocating to New Zealand(App D).I was not even noticed. Their decisions stated that the indictable offenses and cognizable felonies, malicious prosecution were protected activities under the constitution.

These were in violation to the constitutional guarantees, and established laws. The Courts lost subject matter jurisdiction when it made orders it had no authority to make, granting relief it had no authority to grant. These are void too.

Judgments of 2008 are also void because each of them contradicts the state and federal laws [See section titled *Child Support Laws*, *Spousal Support Laws*, and *Property Laws*]. The Court lost subject matter jurisdiction when it made such orders that violated public policy, and statutory laws.

Judgments are also void due to alleged civil rights violations. [See section titiled *Unconstitutonal because they violate Civil Rights*).

Other Circuits have held that if a court grants relief,which under the circumstances it hasn't any authority to grant,its judgment is to that extent void.(*Eggl v.Fleetguard ,120c.*)] such illegal orders are forever void.Judgments made in clear absence of jurisdiction and judgments made in excess of jurisdiction are not binding; Void Judgments are subject to collateral attack(*46 Am.Jur.2d,Judgments Â§ 25,pp.388-89*].Void Judgments cannot be ratified [*In re Garcia,105 B.R.335 (N.D.Ill. 1989)],*they are not entitled to enforcement,and all proceedings founded on the void judgment are themselves regarded as invalid.[*30A Am Jur Judgments* " 44,45].

Other circuits have held that a Judge will be subject to liability when he has acted in the "clear absence of all jurisdiction," [*Bradley v.Fisher,13 Wall.335,80 U.S.351.Pp.435 U.S.355-357.cited in Stump v.Sparkman,435 U.S.349(1978),page 435,US 350*].

Other Circuits have held that deprivation of civil rights under color of law [1983,1985,1986] represents felonious conduct which accrues liability.

Other Courts have found that government organizations may be legitimate RICO enterprises. [See section titled *Laws About RICO*], and that liability accrues for RICO predicate acts [See section titled *Split Across States on Matters Related To RICO*]

Other circuits have held that liability also accrues when attorneys who misrepresent their clients interests,breach their fiduciary and professional duties. Other circuits have held that liability accrues for breach of fiduciary duties against ex-husbands.

Other circuits have held that liability accrues for fraud upon the Court, and that fraud upon the court is not subject to statute of limitation [*Kenner v. C.I.R., 387 F.2d 689, 691 (7th Cir. 1968); Herring v. United States, 424 F.3d 384, 386-87 (3d Cir.2005); see also, generally 18 USC 242 ("Deprivation of rights under color of law"); 18USC 371 ("Conspiracy to commit offense or to defraud United States"); 18 USC 1001(a)("Statements or entries generally"]*It also accrues for civil conspiracy, which conspiracy is ongoing here [See section titled *Split Across States Related To Conspiracy*]. All proceedings founded on the void judgment are themselves regarded as invalid.[*30A Am Jur Judgments " 44,45*]. Also see additional caselaws in section titled *Opinions on Void Judgments.*Void Judgments are unconstitutional. Any complaint seeking declarative and injunctive relief, and damages against making, sustaining, and refusal to vacate such unconstitutional void judgments cannot be deemed frivolous.

Split Across States On Matters Related To RICO

District Court's dismissal states *"dissatisfied with the results of that divorce and related state court proceedings,plaintiff now alleges a massive conspiracy involving more than 30 defendants..."*

The pleadings that were stricken from record actually stated:

> *"**Many** attorneys,and current and former judges have direct or indirect ties to the corruption.**Some** attorneys and judges are active participants or effectively facilitate the racketeering as accessories.The **non affiliates** are usually penalized for their refusal to co-operate with the cartel."(para 169).*
>
> *"Defendants have had and do have,upon information and belief,legitimate business plans outside of the pattern of racketeering activity.Each defendant is functionally separate and independent from the CFDE enterprise,and work independently,but routinely agree to come together culpably to engage in fraud,ignoring the established law"(Para 214,page 36)*

The District Court also states that plaintiff believes that *"everyone involved – her lawyers.Her ex-husband,his lawyers,expert witnesses involved in her divorce proceedings,the judges who presided over those proceedings,and more – is in cahoots and out to deprive her of money and property*".This is also untrue.In my pleadings,I have explicitly stated that although it began as a conspiracy to defraud me,over time it morphed into a conspiracy to conceal the wrongful acts of the attorneys and lack of jurisdiction of the Santa Clara Courts. I never said everyone is involved. However, for Judge Drozd to say that no crime has been committed or that no one is responsible is a travesty that minimizes the crime against women.

Courts have held that 18 USC 1961 should be liberally construed to effectuate its remedial purpose [*United States v Kaye(1977, CA7 Ill) 556 F2d 855,95 BNA LRRM 2666,81 CCH LC 132343, cert den],* legislative intent being to make RICO violations dependant upon behaviour, not status; 18 USC 1961 and 18 USC 1955 were both part of Organized Crime Control Act of 190 *[United States v Forsythe (1977,CA3 Pa) 560 F2d 1127].*

Higher Courts have found that government agencies,courts,political offices may constitute an enterprise.Among the government units held to be enterprises are offices of governors,states legislatures,courts,court clerk offices,police,sheriff's departments,county prosecutors office,tax bureaus,wardens of prisons.There are greater than 30 reported cases holding that a government entity may be an enterprise[*United States v Thompson,685,F2d,993 999(6th Cir,1982);United States v Freeman,6 F3d 586 596-597(9th Cir,1993 – offices of CA 49th Assembly District);United States v Alonso,746,F2d 862,870(11th Cir,1984)– homicide section of Dade County,Public Safety Deptt);United States v Ambrose,740,F2d,505,,512,(7th Cir,1984)Police dept;United States v Davis,707,F2d,880,882-883;United States v Thompson,6th Cir,1982 – Tennessee Government Office etc etc;United States v Frumento,405,F Supp,23,29-30(E.D Pa 1975)aff'd 563 F2d 1083(3rd Cir,1977),Cert denied 434,US 1072(1978).*The *Frumento* decision is consistent with RICO's purpose of ridding the nation's economic life of the "cancerous influences of racketeering activity".

Other circuits have held that government enterprise may be a group of individuals associated in fact "rather than a legal-entity within 1961(4)[*United States v Stratton,694 F2d,1066,1075(5th Cir,1981);United States v Baker,617,F2d,1060(4th Circuit,1980).*

Public officials are not immune from RICO actions even if governmental entities could not be charged as the enterprise.The governmental officials might themselves be charged as a criminal association in fact enterprise [*United States v Turkette,452 US 576,580(1981); Kearney v Hudson Meadows Urban Renewal,829 F2d,1263,1266(3rd Cir,1989); United States v Benny,786,F2d,1410,1416)]*.

Other Courts have allowed RICO claims in divorce proceedings(*Perlberger v.Perlberger,1998 WL 76310,1998.EPA.1313(E.D.Pa.Feb.24,1998;Vickery v.Vickery,1996 WL 255755(Tex.App.Dec.5,1996)8*,aff'd over dissent,*Vickery v.Vickery,999 S.W.2d 342(Tex.1999);Liles v.Liles,289 Ark.159,711 S.W.2d 447(1986)*],against municipalities,against lawfirms(*Liles v.Liles,289 Ark.159,711 S.W.2d 447(1986);Gerbosi v Gaims,Supra*].
The attorneys act in concert with CPA's,Vocational Assessors,and Custody Evaluators act in aid and abet the attorneys in commission of the alleged crimes.Merely belonging to an enterprise is not by itself a crime[*United States v Castilano(1985,SE NY)610 Fed Supp 1359]*until members conspire to commit a crime. Different groups of people committing separate acts do not necessarily constitute different enterprises(*United States v Coonan,938 F2d,1553,1560(2nd Circuit,1991) cert denied 112 S Ct 1486(1992) – affirming RICO conviction when members changed over time); United States v Swiderski 441 US 993(1979) noting that enterprise make up is,of necessity,a shifting one,given the fluidity of criminal associations; United States v Masters,924 F2d 1362,1366(7th Cir) cert denied 111 S Ct 2019(1991) - informal consortium of lawfirms,two police departments and three individuals ...could constitute an enterprise]. RICO encompasses political parties [Jund v Town of Hampstead,941 F2d 1271,1281-82(2nd Cir,1991)],public utilities [County of Suffolk v Long Island Lighting Company,907,F2d 1295,1305-38(2nd Cir,1990)],and municipalities [Harow Inc v American National Bank & Trust Co,747 F2d,384(7th Cir,1984),aff'd on other grounds,473 US 606(1985)].*

Lawyers associated with the enterprise,conducting their business thru patterns of predicate offenses like bribes and forgeries and conspiracies can be charged with RICO violations [*United States v Yonan F2d,164(7th Cir,1986) cert denied,479,US 1055(1987)]*.

Bribing judges to help them illegally reduce their workload,and with promises of election contributions,constitutes association with Court enterprise *United States v Roth,860 F2d,1382,1390(7th Circuit,1988) cert denied 490,US 1080(1984)*.Even if there was no monetary bribes paid to the Judicial Officers,no economic motive is necessary for RICO [See *National Organization for Women,Inc.v.Scheidler,510 U.S.249(1994);* Reducing workload by associating with defendants engaged in commission of crimes,is a RICO predicate offense.It was the duty of judicial officer DAVILA to engage in due process [*United States v Kaye,586 F Supp 1395,1398-1400(N D III,1984)*.The alleged enterprise has a connection with the racketeering acts that affect the interstate and foreign commerce [Musick v Burke,913 F2d,1390(9th Cir,1990). The schemes and artifices have been adequately plead in my Complaint filed with the District Court, and in the *Appellate Statement.*

Judicial Defendants engaged in violation of RICO solely by virtue of their position in the hierarchy of the enterprise,and/or involvement and control over the enterprise -(See 18USC 1962(c); *United States v Scotto,641 F2d 47,54(2nd Cir,1980); Sun Savings & Loans Assn v Dierdorff,825,F2d,187,195(9th Cir,1987); United States v Blackwood,768 F2d,131,137 – 38(7th Cir,1985).* Several defendants had day to day control over the proceedings,and they manipulated the proceedings [*NCNB National Bank of North Carolina v Tiller,814,F2d,931(4th*

Cir,1987)],a nexus exists between control of enterprise,and alleged racketeering avtivity [*Shearin v E F Hutton Group Inc,885 F2d 1162,1168,n.2(3rd Cir,1989)*.

Other circuit courts have adjudicated on such obstruction of justice into an inequitable marital settlement contract [See *Vista Co v Columbus Pictures Indus.725 F Supp 1286,1300-01(SDNY,1989)*]. Under 1961 (A) and (F), one or more defendants engaged in mail fraud (1341), wire fraud (1343), bank fraud (1344), honest services fraud (1346), bribery (201), immigration fraud (1425,1426), obstruction of justice (1503), witness tampering (1512,1513), interference in commerce (1951) , racketeering (1952), money laundering (1956),using illegal money transmitters (1960), extortion, forgery. Others assisted him.

Split Across States On Matters Of Civil Rights Violation

The state law on property,support and attorney fee are aligned to federal recommendations and directions,controlled by Access to Justice Act,and Uniform Marriage & Divorce Act applicable nationally.Therefore,it is not the law that is an issue here,but the process that oversees the implementation of the law. This process was manipulated to violate my constitutional rights, interest and privileges. Interests comprehended within meaning of either liberty, or property under procedural guidelines of due process caluse of 14th amendmet include interests that are recognized, protected by the state law and interests guaranteed in one of the provisions of the Bill of Rights incorporated in the 14th Amendment, which creates rights of actions against person who, under color of law, subjects another to deprivations of any rights secured by federal constitution – make deprivation of latter types of right actionable independently of state law [*Paul v Davis (1976) 424 US 693,47L Ed 2d 405,96 S Ct 1155,1BNA IER Cas 1827 reh den*]. Also see [*Jones v District of Columbia (2003, DC Dist Col) 273 F Supp 2d 61*] for 5th Amendment right.

Causes of action under 1983 exist under Fourth Amendment where Plaintiff can allege facts that tend to show that State Actor exceeded bounds of 4th Amendment. Here, KHERA has conspired with state actors to seize all my property. State involvement infringes on my First Amendment rights to petition under 1985(1), (2) and (3), 1986. The aim of the conspiracy is to influence the activity of the state [See *United Bhd of Carpenters & Joiners Local 610 v Scott (1983) 463 US 825,1035 Ct 3352, 77 Led 2d 10449 113 BNA LRRM 3145 32 CCH EPD 33697,97 CCH LC 10231].* Courts have held that Conspiracy in context of 1985(3) means that co-conspirators have agreed at least tacitly, to commit acts which will deprive Plaintiff of equal protection of state laws [See *Santiago v Philadephia (1977,ED Pa) 435 F Supp 136.*] Court shave also held that if a party has potential to stop illegal activity but fails to do so, then that party may be said to have impliedly conspired in such illegalities [*Dickerson v United States Steel Corp (1977,ED Pa) 439 F Supp,55,15 BNA FEP Cas 752 15 CCH EPD 7823,23 F Serv 2d 1429].* Here, the state actors were willing participants in the illegal activities alleged.

Circuit courts have also held that attorneys that take action on behalf of clients that attorney knows or reasonably should know will violate clearly established constitutional guarantees or statutory rights of another, may be held liable for damages *[Stevens v Rifkin (1984) ND Cal) 608 F Supp 710].* Circuit Courts have also ascribed liability under 1985(3) when attempts to have charges brought against co-defendants were suppressed by defendant public officers acting under color of law [*Azhar v Conley (1972, CA6 Ohio) 456 F2d 1382, 15FR Serv 2d 1179* – as attorenys and Judicial officers have done here, to prevent me from filing complaints against officers of the court. Other circuits hold that actions in civil rights cases should not be dismissed at the pleading stages unless it is certain that Plaintiff can prove no set of facts that

would entitle him to relief *[Williams v Codd (1978,SD NY), 459 F Supp 804].* Here, District Court and Appellate Court excluded my evidence, refusing to look at the evidence that would provide proof of success. They even denied the injunctive and declarative relief. Even though 42 USC 1985 refers in precise terms suit for dmaages, federal Court may fashion effective equitable remedy [*Mizell v North Broward Hospital District (1970, CA 5, Fla) 427 F2d 468].*

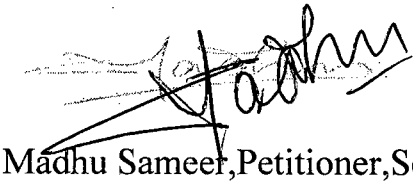
Circuit Courts have held that *"[p]rocedural due process rules are meant to protect persons not from the deprivation,but from the mistaken or unjustified deprivation of life,liberty,or property." Carey v.Piphus,435 U.S.247,259(1978). [P]rocedural due process rules are shaped by the risk of error inherent in the truth-finding process as applied to the generality of cases.*[Mathews v.Eldridge,424 U.S.319,344(1976)]

Californian and other courts have ruled that suits may not be dismissed without a trial.[."*Counsel and her clients have a right to present issues that are arguably correct,even if it is extremely unlikely that they will win ....[A claim] that is simply without merit is not by definition frivolous and should not incur sanctions.Counsel should not be deterred from filing such [claims] out of a fear of reprisals."(California Teachers Assn.v.State of California(1999) 20 Cal.4th 327,340,975 P.2d 622,84 Cal.Rptr.2d 425,quoting In re Marriage of Flaherty(1982) 31 Cal.3d 637,650,183 Cal.Rptr.508,646 P.2d 179.)].*

SUMMARY & CONCLUSION

I do not know who among these defendants is responsible for my losses,injuries and damages. Therefore liability is individual and several. I will be able to provide all supplementary evidence after discovery. A complaint seeking injunctive and declarative relief with damages for orders made in 2008 in clear absence of jurisdiction cannot be frivolous. Injuries,losses, damages are detailed in the Statement filed with the 9th Circuit, and in the Complaint filed with the district court. . Centriori corrects excess of jurisdiction or clear absence of jurisdiction. Each of these Judgments are either in excess of jurisdiction, or in clear absence of Judgment and such judgments may be set aside even after many years,and many unsuccessful attempts.[*Andrew v Police Court,21 Cal 2d,479,133,P2d,398(1943)*]. Given all the above,this Court should grant the Petition for Writ of Centriori. I request the Court to order a supplementary petition regarding details for any specific claim.

Respectfully Submitted



03/23/2020

Madhu Sameer,Petitioner,Self Represented