
Case No. 20-1022

**THE SUPREME COURT
OF THE UNITED
STATES**

Jean Coulter, Petitioner

v.

JAMsan Hotel Management, Inc. & others,
Respondents

On Petition for Certiorari
to the Supreme Judicial Court of
Massachusetts

**Petition for Reconsideration of
Denial of Writ of Certiorari**

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Reconsideration of the denial of Coulter's Petition for Certiorari is required as the pendulum is again swinging – and the nation is once again demanding that all members of the Justice System be forced to accept full responsibility for all of their improper acts.

Indeed, April 2021 has become a pivotal time in this country. And, with this Petition for Reconsideration, This Honorable Court has been given the opportunity to step forward to require that all Jurists (both state and federal) also accept their proper role in a Society which demands that all of the Members of the Justice System conform to the laws. The time is coming (hopefully very soon) when this country will no longer have to accept that certain classes of people are going to be treated as being "above the law" – and headlines in the News both today (April 21, 2021) and earlier this month, are proof that that day is coming sooner than many would have believed even just a few months ago!

Argument for Reconsideration

The Instant Matter concerns an "older" woman who was subjected to abuses, first by employees of a "budget" hotel, then by the members of the Lexington, Massachusetts Police Department who eventually joined them - all of whom chose to become part of a plan to violate Coulter's Rights, simply so the hotelier could rent Coulter's room to a member of a tour group who would not otherwise have been accommodated in the same buildings as their fellow travelers. And, the abuse of Coulter continued as the more respected/ more educated/more highly paid members of the "Justice System" (lawyers and judges) also consciously made the decision to take actions, themselves, which were also intended solely to protect those officers both in the court of public

opinion as well as inside the courtrooms of the Commonwealth of Massachusetts.

Indeed, it is within the courthouse that the insidious nature of this coterie truly becomes evident - as the officers' crimes were quickly "swept under the rug" inside the courthouse (just as they had been when Coulter attempted to have them disciplined by their superiors in the Police Department) – all done in the name of "unity" behind the "Thin Blue Line".

So, it is therefore particularly fitting that the actions by the hoteliers in coordination with the local "Law Enforcement" should be brought before This Court, at this time, as this Matter is yet another example of what has been happening recently in as Missouri well as in Massachusetts, and indeed, in cities and towns all over this country.

Abuses by the Justice System in Massachusetts
Beyond the Instant Matter

Earlier this month, the Boston Globe printed the first of several stories all of which highlight the horrible history of abuses which were *initially* inflicted by a single patrolman on Boston's Police Force, Patrolman Patrick Rose. But Patrick Rose's actions never could have continued long enough for Rose to find new victims among the children of one of the first victims – had Rose not been aided by other members of both his department as well as the rest of the "Justice System" in Massachusetts! The fact that this new generation of Rose's victims even exists, would never have been possible had it not been for the coordinated effort of members of his profession along

with the assistance of the rest of the state's "Justice System" :

"Police Union President, Now Charged with Abusing 6 Kids, Kept Badge *Despite Internal Affairs Determining He Broke Law in 1995 Case*" (*emphasis added*) (lawandcrime.com, Alberto Luperon, Apr 11th, 2021, 1:19 pm)

As the articles about Patrolman Rose continue, they explain that Rose eventually became a leading voice in the fight against body cameras for police officers :

"As union president, Rose helped patrol officers win a new contract and led a fight against officers wearing body cameras."

(By Andrew Ryan, Globe Staff, Updated April 10, 2021, 5:38 p.m.)

And Rose's interest in keeping cameras from recording the actions by police officers is clearly related to the fact that the courthouses throughout this country also almost universally prohibit any form of recording and real-time transmission of the record of the events – as this secrecy is an essential component of the continuing abuses by the Members of the Justice System (including lawyers and judges).

As Coulter has explained in her Petition for Certiorari, the "pervasive bias" (which Coulter argued exists in all levels of the state and federal courts), requires that there can be no solid, physical evidence of the crimes which could be independently reviewed and confirmed by the Public. Indeed, it is readily apparent that when Coulter argued that the "secret-handshake had been invoked" (page 25, Petition for Cert) she did so in order to provide evidence to This Honorable Court that you must also act in order to end the cover-ups which have so

frequently permitted the Derek Chauvins and Patrick Roses to remain free in civilized society. But, thus far, the jurists in the state's appellate court have continued to also be "shielded", as **This Court has refused to "call-out" those jurist(s) who repeated the fabricated "fact" that Coulter was forcibly removed from the hotel ostensibly because of abuse of the advertised "on-demand" shuttle service, by merely attempting to use it twice within the first ten (10) days of her scheduled six (6) week stay!**:

"[Coulter] was removed from her room based on extensive use of the hotel's complementary shuttle service."

There is no where in Coulter's Complaint where it is ever even implied that Coulter had "extensive[ly] use[d] the hotel's complementary shuttle service" – *or that even if she had, that the laws of Massachusetts would permit that Coulter be removed from the hotel even if it had occurred. Indeed, the Petition for Certiorari instead explains that this Decision was exclusively the result of Pervasive Bias, favoring "Justice System" defendants.*

As Coulter's filings have repeatedly pointed out – and Coulter is certain that This Honorable Court is also well aware, hoteliers are not permitted to forcibly remove a guest for something as trivial as attempting to use the advertised shuttle service on two separate occasions (a week apart). And, Coulter's petition for Certiorari even includes copies of the pertinent State Statutes which concern this requirement of any hotelier. As explained in **Sections 5, 7 and 12C of Chapter 140** (Appendix of Petition for Certiorari, pages 32a. – 35a.), when read together, require that the hotelier cannot refuse

accommodations, and even imposes a fine any time that the hotel does this :

Section 5. Every innholder and every common victualler shall at all times be provided with suitable food for strangers and travelers.

Every innholder shall also have upon his premises suitable rooms, with beds and bedding, for the lodging of his guests.

and

Section 7. An innholder who, upon request, refuses to receive and make suitable provision for a stranger or traveler shall be punished by a fine of nor more than fifty dollars.

So, the hoteliers in Massachusetts (and elsewhere) are required to accommodate guests, except as explained in **Section 12C of Chapter 140** of the state's statutes, which explains that a guest can be removed for only a very limited set of circumstances – none of which applied in any manner :

- (a.) refuses to pay or is unable to pay, or
- (b.) acts in an obviously intoxicated or disorderly manner, or
- (c.) destroys or threatens to destroy hotel property, or
- (d.) causes or threatens to cause a disturbance

While Coulter did not include a copy of the text of **Chapter 140, Section 12B**, that section includes one additional reason why a guest might be able to be removed from the hotel – but **no one** ever asserted that it applies – that is until the State Court apparently “pulled it out of his hat”, so that judge could “justify” his decision to rule in favor of the Police Defendants and their co-conspirators (and therefore against Coulter) Indeed, Section 12 B permits removal of a guest who :

(e.) violates a rule of the hotel that is clearly and conspicuously posted at or near the front desk and on the inside of the entrance door of every guest room.

However, this “argument” was never asserted by any of the Defendants, but instead was only developed by a Jurist who was clearly attempting to provide a plausible excuse for what was so clearly an attempt to “assist” other members of the Justice System who had been discovered to be part of a criminal conspiracy against Coulter. It should also be noted that the reason that none of the defendants’ lawyers ever asserted that **Section 12 B** would apply – is because the only locations which even mention the shuttle service are on the hotel’s website, and that location only explains that the shuttle is on demand, and only available during certain hours.

Pervasive Bias Favoring Members of the Justice System is Not Limited to Massachusetts and is Not Limited to Civil Cases

Of course, Patrick Rose is not the only member of the Justice System who has recently been in the news. Even more infamous are the actions of Officer Derek Chauvin and his “fellow officers” in Minnesota. While only Chauvin has been put on trial thus far, it is clear that the time for the “Thin Blue Line to unconditionally provide complete protection to members of Law Enforcement has passed – and the time is also long past due, for the rest of the “Justice System” to also be held accountable for behaviors which are not considered to be acceptable for the general public.

Recently the news has been looking at the number of people who are killed each day by police officers. **In fact, every day between the**

commencement of the murder trial for Derek Chauvin's murder of George Floyd (on March 29, 2021), until the date of the article (April 17, 2021) – THREE (3) people died each day at the hands of Law Enforcement in this country!

And that number is only slightly higher than the average has been for at least the past five (5) years!

The New York Times published an article by John Eligon and Shawn Hubler on April 17, 2021, which describes the killing of a child, at the hands of a Chicago Police officer in the hours just before the trial in the death of George Floyd began :

“... a Chicago officer chased down a 13-year-old boy in a West Side alley and fatally shot him as he turned with his hands up.”

And, the article continues to explain that gender, skin color and age certainly appear to be major factors in which encounters with police will turn lethal :

“Nearly all of the victims since March 29 have been men ... Black or Latino people substantially overrepresented - a pattern that reflects broader criminal justice research. And most were under 30. Four were teenagers....”

So, while prejudice would “explain” (to some limited extend) how a certain portion of actions which resulted in the deaths began, it is hard to contribute the deaths of children (young teenagers) exclusively to those prejudices.

Further, the article explains that only a tiny portion, slightly over one percent (1.1%) of the deaths at the hands of police are ever prosecuted as murder or manslaughter – and it is this statistic which This Court must consider at this time. The article explains that Philip Stinson, a criminal justice

professor at Bowling Green State University believes that the problem with obtaining prosecutions is because the legal system and laws themselves give to much deference to the police. In my opinion this admitted deference in court cases exists exclusively to maintain the status quo in all of the courts. Indeed, when a Lower Court has improperly given weight to argument or evidence or even fabricated that argument from the bench, higher courts typically continue to give deference to that determination is completely irresponsible. Further, the professor and I also agree that status quo is intended to (and does) protect "more than 18,000 law enforcement agencies across the country", to which I add, protects as well as all of the numerous Judges and Lawyers.

What is crucial for This Honorable Court to consider though, is that shockingly large numbers of those individuals in the Justice System who consciously, and even willfully, do not follow the "rules" simply because they know that they can get away with it... not because they were over-taken by stress or unaware of the totality of the circumstances, but simply because they knew that they would never be required to answer for their actions! That is why I am asking This Honorable Court to reconsider denial of Certiorari –and require that Defendants prove that they were acting in the manner that they know to be required by the law – instead of the manner in which they believe they would "get away with".

Respectfully Submitted,

Jean Coulter