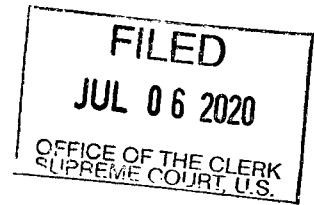


20-5229 ORIGINAL
No. _____



IN THE

SUPREME COURT OF THE UNITED STATES

Arthur Lopez — PETITIONER
(Your Name)

vs.
Costa Mesa Police Dept, RESPONDENT(S)
et al
ON PETITION FOR A WRIT OF CERTIORARI TO

United States Court of Appeals for the Ninth Circuit
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Arthur Lopez
(Your Name)

P.O. Box 13081
(Address)

Newport Beach, California 92658
(City, State, Zip Code)

949 467.0937
(Phone Number)

QUESTION(S) PRESENTED

Should the absence of Probable Cause and the absence of even Reasonable Suspicion in a warrantless stop of Petitioner, his four minor children and vehicle seizure be deemed unconstitutional and actionable as a deprivation of Civil Rights under the Fourth and Fourteenth Amendments under § 1983, United States Supreme Court *Monroe v. Pape*, 365 U.S. 167, 171 (1961) and *Brinegar v. United States*, 338 U.S. 160 (1949) and *Beck v. Ohio*, 379 U.S. 89

LIST OF PARTIES

- ☒ All parties appear in the caption of the case on the cover page.
- ☐ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

- United States Supreme Court Docket # 19A942
Arthur Lopez v. Newport Beach Police Department,
U.S. Court of Appeals for the Ninth Circuit # 18-56452, et al
- United States Court of Appeals for the Ninth Circuit
Case No. : 19-55231
Arthur Lopez v. Corona Police Department, et al

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APPENDIX C	Actual Costa Mesa Police Department Initial Complaint February 23 rd , 2015 - Rec'd by Sgt. Bryan Watkins
APPENDIX D	Costa Mesa Police Department Bogus Citations # CMZ 227302 and # CMZ 164499

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a)	Harlow v. Fitzgerald 457 U.S. 800 (1982)	
b)	Manuel v. City of Joliet, Illinois, et al, 580 U.S. — (2017)	
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g)	United States v. Jacobsen, 466 U.S. 109, 124	
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- R.) *United States v. Ortiz*, 422 U.S. 891 (1975)
- S.) *Whren v. United States*, 517 U.S. 806 (1996)
- T.) *Monroe v. Pape* 365 U.S. 167, 171 (1961)
- U.) *Foman v. Davis* 371 U.S. 178 (1962)
- V.) *Boyd v. United States*, 114 U.S. 616 (1886)
- W.) *Weeks v. United States*, 232 U.S. 383 (1914)
- X.) *Brady v. Maryland*, 373 U.S. 83 (1963)

Points of Authority (continued) Cited

- California Supreme Court

a) Howard Jarvis Tax Payers Association

City of La Habra
25 Cal 4th 809 (2001)

- United States Court of Appeals

a.) Myers v. Patterson, 819 F 3d 625
(2nd Cir)

b) Camilo Robles v. Moyos, 151 F. 3d 1
No. 97-2264, 97-2260, 97-2261
97-2262

c.) Okin v. Village of Cornwall, Hudson
Police Department
577 F. 3d 415 No. 06-5142

d. U.S. v. Hawkins 249 F 3d 867, 872
(9th Cir - 2001)

e. U.S. v. Cervantes 703 F. 3d 1135, 1141,
(9th Cir - 2012)

IN THE
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

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

OPINIONS BELOW

☐ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix A to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

The opinion of the United States district court appears at Appendix B to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

☐ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was February 6, 2020.

☒ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including July 5th, 2020 (date) on February 25, 2020 (date) in Application No. 19 A 941.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☐ For cases from **state courts**:

The date on which the highest state court decided my case was _____.
A copy of that decision appears at Appendix _____.

☐ A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ____ A ____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

United States Constitution Civil Rights

First, Fourth, Fifth, Eighth and Fourteenth Amendment

U.S. 42 U.S.C. § 1983

U.S. 42 U.S.C. § 1985

U.S. 18 U.S.C. § 241

U.S. 18 U.S.C. § 242

Ca Veh. Code 21651(a)(2)

Ca Veh. Code 4000(a)(1)

STATEMENT OF THE CASE

Most honorable United States Supreme Court
This case arises from the systemic and systematic standard operating procedure of the defendants, Costa Mesa Police Department, City of Costa Mesa, Christopher Walk, Isidro Gallardo and Jeffrey Horn depriving minority petitioner Arthur Lopez of his Civil Rights including the protections provided under the Fourth and Fourteenth Amendments due to his Mexican-Heritage Hispanic-Latino Race, Catholic Christian Religion, Male Gender and Familial Status. Specifically these defendants repeatedly unlawfully and unconstitutionally seized petitioner and his automobile without a warrant, without probable cause, without a reasonable suspicion and even in one instance outside of their jurisdiction entirely. In two separate events defendants also racially profiled petitioner, proceeded to unlawfully stop, seize and search petitioner and his automobile. In the first of these assaults upon petitioner on May 23rd, 2012 while in route to an Inter Faith Discussion @ (Citation # CMZ164449) Our Lady Queen of Angels Catholic Church in Newport Beach, Ca and while traveling Southbound on Highway 55 in the "City of Santa Ana", Costa Mesa Police Officer Jeffrey Horn despite being out of his jurisdiction and in violation of existing case law under California Superior Court Appellate Division

Case No. AP-14864; People v. Donald E. Landis, Jr. (9/12/2007) which held that Costa Mesa Police Officer Kha BAO on June 12, 2006 acted in excess of his authority in citing motorist outside of his jurisdiction in neighboring city Santa Ana Heights, (citing People v. Hamilton, supra 191 Cal App. 3d Supp @ pp. 15-16, 236 Cal. Rptr. 894). These findings by an Appellate California Court precisely paralleled petitioner's encounter with another Costa Mesa Police officer just as in the Landis Case exemplifying the defendants persistent disregard for not only the rule of law but also the indifference to the Constitutional Civil Rights of Mexican-Heritage, Latino Hispanic Minority with a Catholic Christian Religion, since Petitioner was wearing an exposed Crucifix and disclosed his destination, see City of Canton, Ohio v. Harris, 489 U.S. 378 (1989) whereby the United States Supreme Court held that Municipalities failure to train may be held liable under 42 U.S.C. § 1983 for Constitutional violations. This is most relevant since the defendants had already been made aware of the unlawfulness of stopping motorists for infractions outside of their City Limits / jurisdiction and since the stop / seizure is deemed unlawful it is also unconstitutional without a warrant under the protections afforded under the Fourth amendment, right of the people to be secure in their persons, houses, papers and effects against unreasonable searches and seizures... Moreover, since defendant Horn also seized Petitioner's

vehicle after the unconstitutional stop and all findings, evidence obtained as a result of the (after) unlawful stop is deemed unconstitutionally obtained, see *Barley v. United States* 568 U.S. 186 (2013) and also see *Beck v. Ohio*, 379 U.S. 89 (1964) whereby the court held with No Probable Cause for Petitioner's seizure having been shown, the seizure and therefore necessarily the search for and seizure of evidence thereto, were invalid under the Fourth and Fourteenth Amendments. Beyond these Points of Authority in "Beck" the court plainly stated that an Unlawful Stop makes all else inadmissible and therefore defendant Horn was plainly unlawful in taking Petitioner's property. However, the facts in this May 23, 2012 incident are even more revealing of these defendants' corrupt schemes of self-enriching at the expense of Petitioner's Civil Rights and pocket book, For the Petitioner's registration was fully paid up to date @ the local Santa Ana Ca Department of Motor Vehicles 1st street branch and defendant Horn's pretext for impounding the petitioner's automobile was the false Vehicle Code violation under 4000(a) which simply requires the Vehicle Registration Fees being paid up to date which was unequivocally, most certainly, 100% the case since Petitioner had personally visited the D.M.V. office earlier that day and made certain all the registration fees were paid in full. In fact the D.M.V. confirmation of the fees having been paid were provided to defendant Horn before he summoned for a tow truck. As outlandish as this all

appears to your honors and petitioner, it involves even more abuses of police authority since defendant Horn before he summoned for the tow truck and a second motorcycle officer he asked petitioner if he would care to drive his vehicle down the highway to the next off ramp about a mile or two which is marked as "Baker St." from the actual stopping point @ MacArthur ^{Bldg.} ^{City} "Santa Ana". This is relevant since "Baker" street falls in the City of Costa Mesa and what Defendant Horn was attempting to accomplish is to have the record conceal his unlawful stop. Furthermore, Petitioner has discovered that defendant Horn suffered from a mental disorder going back to about 2010 after being involved in a motorcycle/vehicle collision for which he was found to be @ fault. The mental disorder is referred to 'PTSD' - "Post Traumatic Stress Disorder". In fact, defendant Horn behavior that evening was quite bizarre above and beyond his unlawful/unconstitutional abuses described above since he compelled Petitioner to sit in the back of his patrol vehicle while he communicated via the onboard computer with his girlfriend about his delay typing with two hands as he drove on the Highway North of 60 miles per hour and steering with his leg somehow

to the next off-ramp Baker Street in Costa Mesa where he allowed Petitioner out of his Police Vehicle @ a Gas station. During this 2 mile ride he played loud country music and found it necessary to share how he was off duty and was running late to his date. Petitioner has also learned through Discovery and in preparation for the request for Leave to Amend Complaint that Defendant Horn actually filed a lawsuit against his Co-Defendant Costa Mesa Police Department and City of Costa Mesa and was successful in settling this lawsuit for an attractive \$200,000.00 just a short time after his assaults upon Petitioner who aside from disclosing his Catholic Christian Religion also was dressed quite casual in sweats and T-shirt and maybe even a head covering the likes of a Beanie and was driving a Gold colored Lexus SC400 Coupe with large Lorenzo Chrome wheels in route to Church @ approximately 7:30 p.m. where the Guest Speaker was scheduled to be a Muslim Inter Faith Scholar invited by our adult Faith Formation Director who also headed the "Rite for Christian Initiation for Adults" (RCIA) Program. It is also worthwhile noting that during these events the presiding Police Chief was Thomas Nazoi

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who had taken the helm in 2011 and served through early 2015 and was employed for decades by the Newport Beach Police Department under the presiding Police Chief - Jay R. Johnson who held the Top Position in Newport from 2010 through 2016 and who is one of several defendants under United States Supreme Court Docket No 19A942 for similar Civil Rights Deprivation violations including False Arrest, False Imprisonment and Malicious Prosecution - please take Judicial Notice as the Racketeering style of Policing with a clear deliberate indifference to minority petitioners Constitutional Rights when Police come in contact also is consistently displayed, see Monell v. New York City Department of Social Services, 436 U.S. 658, 436 U.S. 694 (1978) and City of Canton, Ohio v. Harris 489 U.S. 378 (1989) whereby the inadequacy of Police Training may serve as the basis for a § 1983 Claim of Liability where the failure to train in a relevant respect amounts to a deliberate indifference to the Constitutional rights of persons...

Furthermore, the defendants in this case also

are held liable as State officers having violated Petitioner's Constitutional Rights under the Fourth and Fourteenth Amendments among others as held in the landmark United States Supreme Court case of *Monroe v. Pape*, 365 U.S. 167, 171 (1961). In addition, in *Brinegar v. United States*, 338 U.S. 160 (1949) this Court held a Warrantless Search must always be reasonable and where defendant Horn made an unlawful stop and search it can not be reasonable. Now then as to the Tolling of the Forum State's Statute of Limitations, not only did the defendants continue to deprive Petitioner of his Constitutional Civil Rights as in another unlawful seizure / stop absent any Probable Cause or even a Reasonable Suspicion on February 19, 2015 (Citation# CMZ227302) @ approx. 5:20 p.m. off of 19th Street and Newport Blvd in Costa Mesa as Petitioner made a lawful left turn into a Commercial Driveway (76 Gas Station) from the left turn lane safely and in front of a white left pointing arrow marking on the roadway and as permitted by the California Vehicle Code.

Consequently, in light of the defendants continued violations the initial May 23rd, 2012 violation and the February 19, 2015 (Citation # CMZ 164499 and CMZ 227302 respectively) the "Continuing Violation Doctrine overrides the applicable Statute of Limitations which may be 2yrs in the Forum State of California, see *Pegram v. Honeywell, Inc.*, 361 F.3d 272, 279 (5th Cir. 2004) where the U.S. Court of Appeals held that "a Plaintiff is relieved of establishing that all of the alleged discriminatory conduct occurred within the actionable period, if the Plaintiff can show a series of related acts, one or more of which falls within the limitations period. The end goal of the continuing violation theory is to accommodate plaintiffs who can show that there has been a pattern or policy of discrimination continuing from outside the limitations period into the statutory limitations period, so that all of the discriminated acts committed as part of this pattern or policy can be considered timely." Accordingly, Petitioner in this case filed the initial complaint against these defendants within two years of the last discriminatory act, of February 19, 2015, on February 17, 2017. In addition, the California Court of Appeals, 2nd District, Division Seven held October 5th, 1983 in *April Enterprises, Inc. v. KTTV, et al.*, 147 Cal.App.3d 805, 826 "Ordinarily, a cause of action accrues upon the occurrence of the last element essential to the cause of action."

Also see *Howard Jarvis Taxpayers Assn. v. City of La Habra*,
25 Cal 4th 809, 107 Cal. Rptr. 2d 369; 23 P.3d 601 [5082591],
where the California Supreme Court ruled the
continued imposition and collection by the defendants
was an ongoing violation, upon which the limitations
period begins anew with each collection (violation).

Therefore, Magistrate Judge Wilner from the U.S. District
court erred in denying Petitioner his request for Leave
to amend the complaint June 30th, 2017 as

Federal Rules of Civil Procedure, Rule 15 states a
party may move at any time, even after judgement to
amend the pleadings to conform them to the evidence
and to raise an unpleaded issue. It also states,
"leave shall be freely given when justice so requires..."

It should also be noted that Petitioner motioned
to disqualify both Judge Fairbank and Magistrate Judge Wilner
from the onset following the abrupt swapping of judges
several months after the lawsuit had been filed and on ^{Concededly} May 1,
y 5th 2017, months after U.S. District Court Judge Josephine Laura Staton
and U.S. District Court Magistrate Judge Rozelle Oliver
had been assigned to Petitioner's Case and Orders had
been issued through the first few months by them. Also,
please note the serious conflicts of interest cited in
regards to Judge Fairbank and Magistrate Wilner had been
just cause to have them disqualified previously. Moreover,
these prejudicial maneuvers by the lower court further
demonstrate the existence of a bias in favor of the defendants,
please see United States Supreme Court findings in
Foman v. Davis, 371 U.S. 178 (1962) whereby this court
reversed the lower courts dismissal for abuse of discretion

after failing to grant petitioner's efforts to amend complaint citing Federal Rules of Civil Procedure Rule 15(a) declaring that leave to amend "shall be freely given when justice so requires,". Clearly in this matter before the court petitioner's efforts to amend his pleadings to reflect the heinous, discriminatory, unlawful and unconstitutional violations perpetrated by these rogue police officers defendants establishing a pattern of abuse and lawlessness as a custom is and was most relevant and truthful albeit ugly, unsettling, embarrassing and unpopular for those involved in facilitating and overlooking these, not only violations, but also crimes by agents of law enforcement and agents of the state. Moreover, it should be noted that Petitioner was also denied a request for a court appointed attorney due to his indigent status despite the complex nature of this case, see United States Supreme Court Case findings in *Hallard v. United States District Court*, 490 U.S. 296 (1989) and 28 U.S.C. (code § 1915d) whereby Federal Courts are empowered to make compulsory appointments in Civil actions. Furthermore, the District Court also erred in disallowing Petitioner's objection to these defendants imposing over 1000 (one thousand) interrogatories upon Plaintiff/Petitioner in proper despite Federal Rules of Civil Procedure

Rule 33(a)(1)(2) clearly limiting Interrogatories to 25. In fact the U.S. Supreme Court has ruled in *Boyd v. United States*, 116 U.S. 616 (1886) and in *Weeks v. United States*, 232 U.S. 383 (1914) that no unreasonably obtained evidence could be used in Federal Cases (Docket Entry 11-2-Case No. 18-55520 U.S. Court of Appeals Pgs. 141-158 - Originally filed with the District Court #17-00297 on 10/27/17).

Nevertheless, in as far as these defendants second Unlawful and Unconstitutional seizure / stop of petitioner and his four minor children and vehicle on February 19, 2015 after Petitioner had safely and lawfully maneuvered a left turn from left turn lane into a commercial driveway - gas station driveway as permitted by Ca Veh. Code 21651(a)(2) which states that "it is lawful to make a left turn with a vehicle on a divided highway through an opening in the barrier designated and intended by public authorities for the use of vehicles or through a plainly marked opening in the dividing section." This being precisely the circumstances under which Petitioner performed his left turn in plain site of defendants Christopher Walk and Isidro Gallardo as they both sat in their patrol car perpendicular to Petitioner's vehicle and Newport Blvd with a dash

recording of the entire episode as Petitioner traveled with his four minor children in a 2003 Lincoln Navigator SUV - Black in Color with Chrome Wheels and tinted passenger windows. In fact, the left turn was performed in front of a large painted white arrow marking on the asphalt pointing left just before the "opening provided" directly in front of the gas station - driveway indicating open access, unblocked, traversable gateway. However, these defendants racially profiled petitioner as a "latino" in a 12 yr. old family vehicle as a target, especially since defendant Walk was on a training assignment with novice/new addition to the force "Gallardo." To summarize, Mexican-Heritage Hispanic Latino with an exposed Crucifix from the Rear View Mirror on the Windshield traveling with a large group of minors-children (4) having made a lawful left turn as codified by CA Veh. Code 21651(a) (2) and as the roadway markings clearly indicated the gateway to the gas station driveway even going as far as dropping the curb divider in this stretch of the roadway directly in front of the gas station driveway unequivocally voids any

and all remote possibilities of an iota of reasonable probable cause or even reasonable suspicion since these defendants-training supervisor-Walk and even newcomer Gallardo are both very familiar with Ca Vehicle Code 21651(a) since this is the pretext they attempted to hang their hat on to justify the stop/seizure but they not only failed to disclose subdivision (2) that provides an exception to the code they cited and underestimated Latino minority petitioners who they had already raked through the coals by defendant Horn as was reiterated in the formal complaint filed @ the Police Station which was received by other defendant - Sgt. Bryan Watkins who continued to deprive Petitioner of his U.S. Constitutional Rights to Due Process by failing to carry through with an Internal Affairs Investigation and instead attempted to cover up for the other fellow officers by doing nothing, see Appendix 'D'. Hence, the seizure/stop of Petitioner and his family and vehicle is deemed unlawful as further confirmed by the fact that the citation was also ultimately dismissed by the Superior Court of California, County of Orange - Westminster on or about April 13, 2016 - The defendants finally succumbed to their deceit, fraud and scheme to deprive

petitioner of his Constitutional Rights to be free of unreasonable searches and seizures since these defendants proceeded to remove petitioner and his four children from their property and arranged to have a tow truck seize the vehicle on their behalf and compelled petitioner and family to the street despite having reasonable alternatives to their unlawful demands to keep the vehicle off of a public roadway since petitioner had stopped on private property of an establishment management frequented by petitioner and who was familiar to those responsible for the property who would have permitted petitioner's vehicle to remain for the necessary duration to satisfy the demands of the defendants in as far as the vehicle registration concerns the defendants discovered after the unlawful stop, all of which is deemed irrelevant and unconstitutional see *Bailey v. United States*, 568 U.S. 186 (2013) and *Beck v. Ohio*, 379 U.S. 89 (1964) holding Unconstitutional Stop and findings, evidence obtained as a result of the unlawful stop is deemed unconstitutionally obtained and secondly where NO Probable Cause for petitioner's seizure having been shown, the seizure and therefore necessarily the search for and seizure of evidence thereto, were invalid under the Fourth and Fourteenth amendment respectively the court concluded.

Unfortunately, these violations of law are not isolated events for these defendants. For example, defendant "Walk" who was involved in an altercation with Male, Latino, minority Alexander Soto who's case was dismissed by Superior Court of Orange Co. following the irrefutable revelation that defendant Walk had lied in his account of the events related to Soto's arrest on or about June 28, 2014. This revelation on video and audio prompted Superior Court Judge Mary Kreber Varipapa to bar defendant Walk's testimony and prohibited Walk from testifying at Soto's trial. Moreover, the video and audio recording also confirmed fellow officer Christina Natividad also lied about the events and was also barred from testifying as per the Los Angeles Times, Daily Pilot. Furthermore, the spouse of officer Natividad, also a Costa Mesa Police officer was found guilty of felony fraud charges - Ryan Patrick Natividad, further establishing the criminality ever present and a custom within these defendants' Municipality. Additionally these defendants have been sued by their own agents, such as officer Scott Hoyer who was awarded (Case No. 0009238) approximately \$110,000 by a jury circa June, 1991 and more recently these defendants Police Assn.

was compelled to settle a lawsuit from their very own Councilmen Jim Riqheimer and Steve Mensinger for over \$600,000.- due to abusive conduct including harassment, illegal tracking and false police report in 2012 - settled in July of 2018 according to the Los Angeles Times Daily Pilot. In fact, the list goes on to 1980 in *Mattson v. City of Costa Mesa*, 106 Cal App 3d 441, 446 and as recently as 2019 from an unidentified shooting victim on October 7, 2019 lawsuit seeking \$3 million in damages according to the Orange County Register. All of these facts and more will establish these defendants as having a deliberate indifference to the Civil Rights under the United States Constitution of the people the police come in contact with as a custom due to the lack of Police training and as has been the experience of petitioners in the two incidents herein described from May 23rd, 2012 and February 19, 2015 and as such these Civil Rights violations are actionable under §1983 and §1985 since the deprivation of Civil rights is orchestrated by numerous

corroborators including those who attempt to conceal the initial violation by depriving due process and equal protection under law as provided by the fourteenth amendment in derailing internal investigations and engage in a coverup as was and is the case in defendant Bryan Wadkins on February 23rd, 2015. Furthermore, these defendants also colluded with neighboring precincts such as Newport Beach and Corona Police Departments.

First, these defendants corroborated with Newport Beach Police Department to the extent of deferring the logging of the February 19, 2015 citation # CMZ227302 from the initial arraignment date of April 21, 2015 as the citation reflects to days after two Newport Beach Police officers - Mathew Biagi and Detective Shawn Dugan withheld material evidence / exculpatory evidence, 11/22/15, under case # 154M12251 to manipulate the outcome of petitioner's trial with also an ulterior motive to deprive petitioner of his Parental Rights and effect Parental Custody. This is to say that these defendants withheld court proceedings on the citation until their colleagues could also deprive Petitioner of his Civil Rights since Newport Beach Police Department Officers also targeted petitioner throughout 2015 prompting several grievance filings by petitioner.

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U.S. Supreme Court Docket No 19A942.

Moreover, and just as sinister and unlawful these defendants planted a spy in the City of Corona where Petitioner had purchased a home in 1990 along with his Mexican Heritage Mother and Stepfather and where they had lived without interruption peacefully through September of 2018.

More specifically these defendants planted Costa Mesa Police Department Communications supervisor Reena Bolle - a spy - on the exact same street as the petitioner's family home which was located @ 2251 Bloomfield Lane Corona, Ca, 92882 since April of 1990. Officer Bolle moved in to 2370 Bloomfield Lane, Corona 92882 on the same straight strip from Petitioner's Family. In fact, these defendants then executed a plan to again have Petitioner's vehicle unlawfully seized unconstitutionally from under a tree adjacent to officer Bolle's residence on the two year anniversary of the Newport Beach Police officers 11/22/15

* "Brady" violation, withholding of exculpatory evidence, on November 21-27, 2017 Reena Bolle summoned Corona PD and colluded with officer Birmingham (who is now deceased) @ age 25 - Motorcycle accident

* see Brady v. Maryland, 373 U.S. 83 (1963).

to have Petitioner's vehicle hauled away while it remained lawfully parked on the residential street under a tree during daytime hours (since it was one of only three trees on the street that provided shade on very hot days). These events are well described under United States Court of Appeals for the Ninth Circuit Case No. 19-55231 please, needless to say, take judicial notice as it solidifies the ruthless, unconstitutional, criminal acts of these defendants as a consorted effort to deprive Petitioner of his U.S. Constitutional Civil Rights and Life, Liberty, Property and Peace. Also, Please note Petitioner's vehicle Registration was also fully paid up to date months prior to the Unlawful seizure of Petitioner's Property and although Magistrate Wilner and Judge Faubank also have attempted to derail Petitioner's case against this third Police Department, the United States Court of Appeals for the Ninth Circuit has already once Reversed and Remanded their erred dismissal under Appeal Case No. 17-56869. Also, on November 21st 2017 while defendant agent Reena Bolle, Communications officer was colluding with Corona Police Dept. to unlawfully seize Petitioner's vehicle he had been on the phone with a representative of the U.S. Court of Appeals Ninth Circuit discussing matters

related to a District Court filings in Riverside
Petitioner was compelled to have filed before
the Thanksgiving Holiday Recess to avoid a
conflict with applicable Statute of Limitations
parameters and since the U.S. District Court
was located approximately 20 miles east of
Corona, Ca seizing of petitioner's only vehicle
certainly created a huge hurdle in meeting the
court deadline further exemplifying the
extreme measures these defendants carry out
with no regard to human life. They must
be stopped. Therefore for all these facts
and many more Petitioner seeks this court's
granting of this Petition for Writ of Certiorari
to restore the rule of Law in the City of
Costa Mesa, Newport Beach and Corona California
as these defendants can not be provided
Qualified Immunity when there is an absence
of Probable Cause since no reasonable person
would conclude that seizure after an unlawful
stop in no way can be determined to be
reasonable when it is in clear violation
of a well established right such as the
Fourth Amendment, see *Mannell v. Golieth, Illinois, et al*
580 U.S. — 2017. Accordingly Petition should be granted.

In closing also see *Camilo-Robles v. Hoyas*,
151 F.3d 1, No. 97-2264, No. 97-2260,
No. 97-2261, No. 97-2262 - 1ST Circuit
where the court held Qualified Immunity
is unavailable to Wreckless and Wanton
Police Judgements.

Respectfully,
Arthur Lopez
ARTHUR LOPEZ

July 5th, 2020

REASONS FOR GRANTING THE PETITION

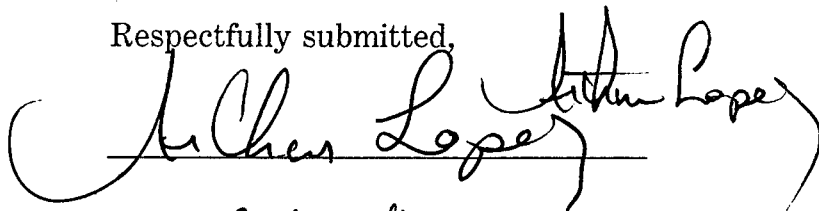
This Petition Should be Granted To Stem The Wave of Police Abuse of Authority, Racial Bias-Discrimination against Minorities-Latinos, Mexican Heritage Hispanics, African Americans-Blacks, etc.

Moreover, this Supreme Court of the Land should make a clear, resounding statement to all Law Enforcement Agents that Disregard for the Rule of Law as a scheme to Unconstitutionally and Unlawfully Seize, Stop U.S. Residents, Racially Profile as a means to Unlawfully and Unconstitutionally Stop Residents Automobiles without Probable Cause or even a Reasonable Suspicion can not be tolerated. Furthermore, Unlawful Acts of Judicial Manipulation for the purpose of interfering with Child Custody Family Matters in a concerted Effort to Deprive Citizens of their Constitutional Rights is a Crime.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Arthur Lopez', is written over a horizontal line. To the right of this signature, the name 'Arthur Lopez' is also handwritten in a similar cursive style.

Date: July 5th, 2020