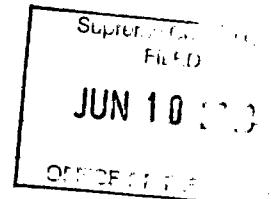


20-5842

No. \_\_\_\_\_

IN THE  
SUPREME COURT OF THE UNITED STATES



YANG MEI — PETITIONER  
(Your Name)

vs.

Mayor and City Council of Baltimore RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Court of Appeals of Maryland  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Yang Mei  
(Your Name)

405 E. Patapsco Ave.  
(Address)

Baltimore MD 21225  
(City, State, Zip Code)

410-355-1299  
(Phone Number)

03-006-01

## QUESTION PRESENTED

### Violations of Amendments of the Constitution

In this case there are two kinds of violations to the Constitution. One is that the violations action directly indicate which Amendment of the Constitution is violated, there are at least 4 of them of these kinds in my case; Another is that the violations action does not indicate what Amendment of the Constitution is violated, but the result and effect Will show unconstitutional. There are at least 2 of them in this case; Please allow me take "The dismissal of the contractor Adam Barclay is unconstitutional" in this case for example:

#### *Related information:*

##### **Action --- it does not indicate violation of which Amendment.**

The Mayor and City Council of Baltimore , through its attorney, Shea Beitler-Akman,Esq., Special Assistant City Solicitor, respectfully Requests that the body attachment for Adam Barclay, entered October 23, 2012 be vacated...." (appendix 3-2, page 26)

#### **Who is Adam Barclay**

Adam Barclay was the contractor , having received my payments of \$42375.00, Hired by me to do the rehabilitation job , required by Baltimore City Department of Housing , for my home building in the year of 2011, which money was more than two years of our family total yearly income in that year,my children had been suffering hunger during those years for paying the money; the contractor Adam Barclay had promised in District Court three times to finish work, and he did not finish job, he did lots damages to our home building: stripped down all the copper water lines and fixtures in good working condition and the whole building big sewerage copper lines that still in good working condition , for money, and a 8x12 in good working condition walk-in refrigerator was torn down for motors and copper lines for money, and three freezers and one show- and-display refrigerator got the same fate of the motors and copper lines , selling for money, even two gutters could not escaped, then depriving the restaurant at the first floor of all equipment and fixtures that were in good working condition, to the floor, got everything out that can sell for money, and then

disappeared; ( these damages became this case evidence of "public nuisance" and "vacant building" for auction --it is a disaster by men made after a disaster by God), then he was added as a defendant ,a bench warrant was issued...was never arrested... A defendant fleeing from a bench warrant , then got dismissed.

**Result -- showing unfair for the homeowner. Violation.**

The appellant landed into fighting for his citizens justness and equality of Constitution rights in courts, for the unreasonable seizure Of my home property, for my children's housing, from the Baltimore City Department of Housing, for housing against auction .

**Effect --- showing unfair for the public. Violation.**

Bad contractors will follow suit, get money and run; good contractors good credit in doubt, business Jeopardized; How about fleeing from warrant? Creating more bad guys trying to follow suit. This is not a good precedent.

**It is unconstitutional. This is only one example,more in writ of certiorari.**

**Move back home in**

Now in this COVID-19 pandemic impact, for maintaining 6 feet of space from other, stay home ,and self quarantine order, school closed, job lost, pay check lost, we have moved back home in.

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.

1.

03-07

03-100

2-85

( 5-869 AT xibnqda )

WFIVL1 nolqetabidnrecl bsnqab , 0505, 15 dJm no bsrtns tnmqgqul  
nrlqtns fo WFIVL1 bsnqab, 0505, 15 vtrnrl no bsrtns tnmqgqul  
bnslvrlM fo slsqqA fo tnuD ati in  
ETOS-4560-134-A00, on case srlomidleB fo lnuD vD bns rovem SV 19M gney . 2

( ET 5859 AT xibnqda )

ETOS , 12 redDOD no slsqqA fo tnuD bnslyrlM fo bsrtns tnmqgqul  
bnslvrlM fo slsqqA lnsqas fo tnuD ati in  
ETOS-8282-338-AS3, on case srlomidleB fo lnuD vD bns rovem SV 19M gney . 3

( 67 5869 , 5 xibnqda )

znmqgqul hnuD tnmqgqul bsnqab , 0505 , 8 srlqab no bsrtns tnmqgqul  
22 thea , vD slomidleB fo tnuD tnmqgqul ati in  
TA6500-02-3-45 , on case srlomidleB fo lnuD vD bns rovem SV 19M gney . 3

( 47 5869 , 5 xibnqda )

notlqng fo tnuD srlqab fo bsrtns tnmqgqul  
vD slomidleB fo bsrtns tnmqgqul ati in  
BT-5525 , on case 19M gney SV srlomidleB fo lnuD vD bns rovem . 5

( 53 5869 , 3 xibnqda ) bnsrtns case 8705 , 5 vrm no bsrtns tnmqgqul  
vD slomidleB fo bsrtns tnmqgqul ati in  
ET-12825 , on case 19M gney SV srlomidleB fo lnuD vD bns rovem . 7

## CASE DETAILED

will not be si nolqfda

si hrt fo jslqab ati si tnmqgqul gsoDw lnsqas ati in gnlqab srlqab ati in gnlqab lla  
to srlL A , srlqab lnsqas ati in case ati in gnlqab srlqab ati in gnlqab lla ( )

gngqg lnsqas ati in case ati in gnlqab srlqab ati in gnlqab lla ( X )

## SETTARA AO TSI

## STATEMENT OF THE CASE

### IN THE DISTRICT COURT

On 11-19-2009 ,Mayor and City Council of Baltimore, the Plaintiff, Order that the Defendant, Yang Mei ,owner of the home property of 600 E. Patapsco ave, Baltimore, to transfer to rehabilitate their home property by May 30, 2010, or a court agent of receivership for the property would be appointed, case#28637-2009 (Appendix 1 page 85). We had been doing the rehabilitation slowly little by little and one by one because of our limited and low income to avoid the financial crash. For the housing for our children,we could not do our rehabilitation slowly little by little any more, the timeline is May 30, 2010. We had to hire a contractor Adam Barclay to finish the rehabilitation , after he went to the District Court 2 times to testify that he would finished the job, we paid him \$42,375.00 in installments by credit cards , which money was more than two years together of our family total yearly gross income in the years . (at that time ,we did not know there was financial help in Baltimore City for rehabilitation.) This case was vacated then on 10-26-2012. (Appendix 3 page 23). Who would have thought that the contractor Adam Barclay did not

finish the rehabilitation, but did great damages to our property, then, disappeared, until in the appellee's "Response to appellant's memorandum ... (Appendix 9 page 72, part 3. )", we knew something About the contractor. That the contractor "was added as a defendant and a bench warrant was issued..." (Appendix 9 ,page 72, part 3.). Is there something more about Adam Barclay we do not know ?

Then, the Mayor and City Council of Baltimore vacated the contractor Adam Barclay (Appendix 9, page 72,part 5; Table of Contents and Appendixes , page 26.) , and also "the above captioned Matter" be dismissed on April 2, 2018; and later vacated the case #28637-09 Once more again on May 02, 2018 by District Court Judge (Table of Contents and Appendixes page 25 ).

Then the Mayor And City Council of Baltimore in the name of "nuisance" and "vacant building" , without proved evidence, using parts of the definition of the Rules, using parts of the violation # 145504A, which had been vacated in the case , dragged the property owner to the District Court once more again for property auction,(Appendix 2, page 102) on 09-11-2018 , Demanding the same job we had hired the contractor Adam Barclay had to do 10 years Ago.

03-10-02

Disregarding our motion (Appendix 4 page21) had reminded them that; the same case like this, using the violation#145504A-1 (Appendix 1 page 90), had been vacated ; that would be a violation to the Constitution; that they would be doing the same thing 10 years ago the contractor Adam Barclay had to do whom you just dismissed; and that it would be not only a violation of the Constitution, also a violation of the Fair Housing Act , and by auctioning our home building while dismissing the wrong doer Adam Barclay is a violation of discrimination, and a violation of 14<sup>th</sup> Amendment of "... deny to any person within its jurisdiction the equal protection of the laws".

We are the victim. We have been waiting for justice for long. We blame the contractor Adam Barclay not everyone else, (page 77 on Conclusion line 4 ).In our motion, we want the Court to dismiss the case .We did not blame everyone else.When we read the sentence saying we blamed everyone else, we read it again and again, once more , and again, It dawns on us that there might be someone else besides Adam Barclay have to be blamed. Here is the sentence:

"The Appellee can identify no decision that is clearly erroneous and instead of taking any responsibility for the last thirteen years the Appellant continues to blame everyone else." (Appendix 9 page 77).

The Appellee said, "The Fair Housing Act does not have any effect on the Appellee's attempt to abate a public nuisance (Appendix 9 page 76 line 3 from bottom)". Is there any proved evidence produced in the District Court at trial except using the definition of the Rule for "nuisance" and the notice 145504-A, which had been vacated in its case ?

Nevertheless the Mayor and City Council of Baltimore closed the case for auction (Appendix B, page 114 ) on April 24, 2019 . We filed an appeal immediately the same day before leaving the Court. How can A show cause order (Appendix 2 page 102) without the Petitioner's evidence , While the respondents evidence Disregarded. It is discrimination. It is unconstitutional.

#### **IN THE CIRCUIT COURT**

The Circuit Court says "the appellate court must consider the evidence produced at the District Court trial in the light most favorable to the prevailing party..." (Appendix 10-0 page 82) . There were no evidence The appellee produced at the District Court . There were no evidence to prove "nuisance". Did the Circuit Court consider Appellant's

03-10-04

evidence of motion to dismiss (Appendix 4 page21) and the Estimate by contractor Nuvision (Appendix 6 page 22), those were produced at the District Court trial; and the photos pictures (Appendix7 page 29) that was in the memorandum (Appendix 8 page 52). And the violation notice#145504A-1, issued 07-11-2006, (Appendix 1 page96 and page 106 ) that had been vacated in the case ? The Circuit Court did not review the contractor Adam Barclay. Did the Circuit Court consider the violation of discrimination, and citizens equal protection of the laws of 14<sup>th</sup> Amendment and other Amendments of the Constitution ?

The Circuit Court reviewed no evidence produced by the petitioner in the District Court of Baltimore at trial. But the Circuit Court in its order said that "B. Substantial evidence was presented to support the District Court's determination." (Appendix 10-0 page 82).

No evidence was presented changed into "Substantial evidence".

We could not believe that were those order words of the Appeal Court of The Circuit Court of Baltimore for The prestige of Justice and equality in Court in our case.

Again, the Circuit Court in its order without proved evidence, wrote :

**"The Property was found to be a nuisance per se, and considered to be**

unsafe, a fire hazard, a threat to health, welfare, and safety of the general public and adjoining property owners, and unfit for human habitation or authorized use. R. at 32." (Appendix 10-0 page 80)

In that this accusation was not true , not simple because it is the definition of Rule,it is the fact that the property is not a nuisance. This property is in the center of Brooklyn, Baltimore, in the front door, there is a bus stop there, hundreds of hundreds of passengers coming from and going to work every day using this bus stop.There are many Residents walking passing by the property, The Baltimore Public work and Health Department have been watching this area. If the property was found to be "nuisance" As the Circuit Court accused, would the Baltimore city public work,would the Baltimore city Health Department ,would the hundreds of hundreds of people Using this bus stop every day, going home and coming from work, would many residents walking passing by , would let this property stand here for long if nuisance from year of 2006 to year of 2020 in this case?

This property is not a nuisance.

**Again here the Circuit Court use the definition of the Rule without proved documents to affirm the case in the District Court in that the Mayor and City Council of Baltimore only use the Rule 's definition and a violation notice which had been vacated in the case as evidence to close the case for a home building auction to make a home**

03-10-06

owner with four children into a homeless in Baltimore city in Maryland is a violation of the Constitution , a violation of the Fair Housing Act and the violation of discrimination.

## **IN THE COURTS OF APPEALS OF MARYLAND**

We filed an appeal to the Court of Special Appeals of Maryland on 09-03-2019. (Appendix 13 page 15)

On October 15,2019, The Court of Special Appeals of Maryland transferred the case to The Court of Appeals of Maryland (Appendix C page 13 )

The Court of Appeals of Maryland

ON January 24,2020 review of certiorari denied.(Appendix D page 78-2)

On March 27, 2020 reconsideration of review denied.(Appendix D page78-3)

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

So here we are, our family join together for this petition to fight

Against the auction of our home, to defend citizens Constitution

Rights, to call for stopping the making more homeless families in

Baltimore.

03-10-07

## REASONS FOR GRANTING THE WRIT

AS in **QUESTIONS PRESENTED** (page 03-11) and **petition for writ of certiorari** (page 03-13) , there are at least **6** violations of Amendment to the Constitution in this case. Even one Violation that would be sufficient cause of damaging the prestige of Justice and equality in courts in Baltimore.The violation to the Constitution in Courts would cause great damages. We respectfully Request the Supreme Court grant our writ ,defend the Constitution and strengthen the Constitution in Courts in Baltimore.

The Circuit Court is an appeal court, It affirmed our case from the District Court using only the definition of the Rule.It is unconstitutional. We Respectfully request that The Supreme Court grant our writ, stop these kinds of violation that using only the definition of the Rule to Affirm a case and strengthen the Constitution in the Court in Baltimore.

03-10-08

## CONCLUSION

Defend the Constitution.

Stop the Auction.

Vacate the case.

Respectfully submitted

Yang Mei / Yuhuan Luo  
Yang Mei / Yuhuan Luo  
405 E. Patapsco Ave., Baltimore  
MD 21225  
Telephone 410-355-1299

07/15/2020  
date

Words count : 1895

Yang Mei  
Yang Mei

03-10-09

No. \_\_\_\_\_

IN THE

SUPREME COURT OF THE UNITED STATES

Yang Mei / Yukuan Liu - PETITIONER  
(Your Name)

VS.

Mayor and City Council of Baltimore - RESPONDENT(S)  
~~for Plaintiff~~

**PROOF OF SERVICE**

We, Yang Mei / Yukuan Liu, do swear or declare that on this date,  
July 15, 2020, as required by Supreme Court Rule 29 I have  
served the enclosed Statement of the Case \_\_\_\_\_ on each party to the above  
proceeding or that party's counsel, and on every other person required  
to be served, by depositing an envelope containing the above  
documents in the United States mail properly addressed to each of them  
and with first-class postage prepaid, or by delivery to a third-party  
commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

Solicitor General of the United States

Room 5616, Department of Justice,

950 Pennsylvania Ave, N.W. Washington, D.C. 20530-0001

We declare under penalty of perjury that the foregoing is true and correct.

Executed on July 15, 2020

Yang Mei / Yukuan Liu  
(Signature)

03-10-10