No. 20-7717

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

Chadd A. Morris

Plaintiff/Petitioner (Pro-Se)

VS.

Gregg Scott, Shan Jumper, Diana Dobier, Rebecca Housenga, Ashley Smith, Mara Sheldon
Britney Petiford, Todd Moody, Sandra Simpson, Paul Vincent

Respondents

On Petition For A Writ of Certiorari to the United States Court of Appeals For the Seventh Circuit
And the United States District of Illinois

Petition For Writ of Certiorari

Chadd A. Morris
Illinois Department of Human Services
Treatment and Detention Facility
17019 County Farm Road
Rushville, Illinois 62681
217-322-3204

QUESTIONS PRSENTED FOR REVIEW

The lower courts having prejudicated this plaintiff, with judicial misconduct, error beyond harmless, amounting to structural, and manifest in the following issues:

1) When making rulings thought the plaintiffs litigation, courts failing to comply with controlling, precedential case laws/legal standards, cited in plaintiffs writ herein.
2) Courts when granting defendants summary judgment, having construed facts in their favor, against controlling legal standards, precedential case law, cited herein, requiring, and obligating courts to construe and favor the "non moving party" which is this plaintiff. Courts failed to apply the conflicting documentations plaintiff provided to show how defendant's professional judgments were falsified by having solely relied on defendants "conclusionary" labels and failing to credit plaintiffs proof he provided that defendants labels give a false and misrepresented assessment of plaintiffs treatment. In courts summary judgment order falsifies the record intentionally by putting false words in plaintiff's mouth claiming defendants can't provide treatment because facility rules prohibit residents from having sex with each other.
3) Courts failed to apply and credit, that of plaintiffs evidence he submitted (defendants treatment progress notes) largely has required "behavioral management" and defendants claims as documented that is why plaintiff cant progress courts failed to apply that "behavioral management" as majority methods of treatment issuing are in fact identified as not sufficient to produce long term changes in clients which amounts to inadequate treatment. Defendants treatment issuing and program in general entertains, threatens and intimidates clients to "give up his constitutional rights". i.e. requiring self incrimination.
4) Courts, while granting defendants summary judgment, allows defendants to avoid liability and continue such violations because of being absent of court orders requiring systemic changes, which is require by controlling/precedential case law/legal standards plaintiff cited herein this writ.
5) Courts, while granting defendants summary judgment "cherry picked" defendants documentations, and plaintiffs evidence filed with the courts and during discovery to intentionally and deliberately leave out anything that showed legal liability against defendants to essentially block plaintiff from prevailing.
6) Courts failed to comply with controlling/precedential case law/legal standards that obligate courts to "put defendants professional judgments and documentations" through "litmus test" of compliance to standards sex offender treatment regulations as cited in cases plaintiff cited herein this writ.
7) Courts throughout this litigation failed to locate a willing attorney/counsel/expert witness for the plaintiff. Since this case requires plaintiffs challenging of defendants professional judgments, precedential/controlling legal standards/case law, plaintiff cited herein this writ.
8) Courts failed to comply with legal standards that permit plaintiff to prevail on criminal violations made by defendant.
9) Courts in summary judgment fails to comply with controlling/precedential cases law/legal standards that obligate courts to rule based on law, and not based on their personal judgment, and preference of the litigant, which is by cases plaintiff cited herein this write. The courts did this by seemingly failing to allow plaintiff to prevail, in spite of multitude of fruitful evidence by preponderance of evidence, courts rather seemed to deliberately and intentionally block plaintiff form prevailing because of his confinement at the facility, relying solely on defendants professional judgment.
10) Courts, while granting defendant's summary judgment, then permits them to continue such inadequate and constitutional offensive treatment methods by only allowing some treatment and not meeting the 14th amendments standards of "adequate" treatment sufficient for one to be released.

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IN THE

SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner/Plaintiff respectfully prays that a Writ of Certiorari is issued to review the Judgments Below:

OPENIONS BELOW

FOR CASES FROM FEDERAL COURTS:

The Openion of the United States Court of Appeals appears at Appendix "B" to the petition, and is to the best of the Plaintiffs knowledge "Unpublished".

The Openion of the United States District Court appears at Appendix "A" to the Petition, and is to the best of the Plaintiffs knowledge "Unpublished".

JURISDICTION

For Cases from Federal Courts:

The Date on which the Untied States Court of Appeals Decided my case was on December 7th 2020.

To The best of the Plaintiff/Petitioners knowledge there was no re-hearing granted. However Plaintiff did file a "Response" to the Appellate Courts order, which they altered his filings, calling it a "Motion For Reconsideration", which such Appellate Courts Decision, appears at appendix "C". This Was decided on December 18th 2020 by the Appellate court.

Subsequantelly The Plaintiff filed a "Motion For Clarification", inquiring about that altered title of Plaintiffs Motion, and inquired into why the Appellate Court Refused to respond or indicate as to why they and the District Court Falsfied their Rulings. Spaffically inquiring why the Appellate court claimed Plaintiff didnt present a Maritiorous claim, i.e. dismissing his IFP status, to show the Courts errored when granting Defendants summary judgment, when Plaintiff provided evidnace, proof, by preponderance of evidnace, of controlling/precidental case law/legal standards that conflicts with Courts orders, Rulings, Decisions having relied on Defendants Professional Judgaments, as well as faslfying the record by misquoting plaintiffs filings, i.e. his summary judgent responses to Defendants, construing, and favoring them, as the moving party in summary judgement, which is against even their cited standards, in summary judgment, to rather favor the non-moving party, which is the Plaintiff. Appellate Court simply Denied this Motion for Clarification, without a response/reasoning, on June 7th 2021. Such decision appears in appendix "D".

The Juriediction of this Court is invoked under 28 U.S.C. §§ 1254, and 1257.

LIST OF PARTIES

All parties do NOT appear in the caption of this case on the Cover page. Additional parties to this case, invovles the ENTIRE Rushville Facility Clinical Team, otherwise known as "Liberty Healthcare". This is due to the Fact that Such persons treatment issuings, and treatment program methods continue to, and have before this Plaintiffs intial litigation date, (authorized under the 'continous violations doctrines' in the cases/legal standards Plaintiff cited herein this writ) violate, and fail to comply with the standards of sex offender treatment methods. Also beucase during this Litigation, some other parties, have been invovled in the inital deprivations of the constutional, legal, statutory rights, in vioaltion agiasnt the Plaintiff, that wasnt initally part of the litigation, thus Plaintiff didnt initally know/was aware of such parties, becuase such parties, had yet to be invovled. such additional parties are required to be enjoined, under the enjoyining, and continous violations doctrines, due to continous, ongoing deprivations in same/simualr nature, by additional parties, after the litigations inital filing, as wall as before its inital filing date.

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

1.) United States Constution, Amendment 1, prohibition from harassment and retaliation for/from filing grievances. 'Section 1, Freedom of religion, speech, press, assembly' "Congress shall make no law respecting an establishment of religion, or prohibiting the free excersise thereof; or abridging the freedom of speech, or of the press, or the right of the people peacably to assemble and to petition the Government for a redress of Grievances".

2.) United States Constution, Amandment 5, section 1, restrictions on prosecutions', "No person shall be held to awnser for a capatol, or otherwise infamous crime, unless on a presentment or indicment of a Grand Jury, except in cases arising in the land or navel forces, or in the militia when in actual service in time of war or public danger, nor shall any person be subject for the same offense to be twice put in jeopordary of life, limb, nor shall be compelled in any criminal case to be a witness agianst himself, not be deprived of life, liberty, or property without due process of law, nor shall private property be taken for public use, without just compensation".

3.) United States Constution, Amendment 14, section 1, 'due process and equal protections', "all persons boren or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United states and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privlages or immunities of citizens of the United States, nor shall any State deprive any person of live, libtery or property without due process of law, nor deny to any person within its jurisdiction the equal protection of the laws". Section 5 'enforcment' "congress shall have power to enforce, by approrpaite legislation the provisions of this article".

4.) Constution from the State of Illinois, Section 12, right to remedy and justice, "every person shall find a certain remedy in the laws for all injuries and wrongs which he recieves to his person, privacy, property, or reputation, he shall obtain justice by law, freely, compleatly and promptly".

5.) Constution from the State of Illinois, Section 23, fundamental principals, "A frequent recurrance to the fundamental principals of civil Government necessary to preserve the blessings of liberty, these blessings cannot endure unless the people recognize their corrsponding individual obligations and responsibilities".

6.) Constution from the State of Illinois, section 24, rights retained, "The enumeration of this Constution of certian limits shall not be construed to deny or disparage others retained by the indiscual citizens of the state".

7.) Title 42, U.S.C.A., Section 1983, "Every person who, under color of any statute, ordinance, reguatlion, custom, or usage of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States, or other person within the jurisdiction thereof to the deprivation of any rights, privlages, or immunites, secured by the Constution, and laws, shall be lieable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judical officer for an act or omission taken in such officer's judical capacity, injuncitive releaf shall not be granted unless a declaratory decree was violated or declaratory releif was unavaible. For the purpouses of this action, any act of congress applpicable exclusivally to the District of Columbia shall be considered to be a statute of the District of Columbia".

8.) Title 28, U.S.C., section 1257, state courts; certiorari', (a) "Final Judgemnts or decrees rendered by the highest court of a State in which a decision could be had, may be reviewed by the Supreme Court by writ of Certiorari where the validity of a treaty or Statute of the United States is drawn in question or where the validity of a statute of any State is drawn in question on the ground of its being repugant to the Constution, treaties, or laws of the United States, or where any title, right, privlage, or immunity is specially set up or claimed under the Constution or the treaties or Statutes of, or any commission held or authority excersised under the United States".

9.) Title 28, U.S.C., Section 1331, federal Question, "the district Courts shall have orignal jurisdiction of all civil actions arising under the Constution, laws, or treaties of the United States".

10.) Title 28, U.S.C., Section 1343, civil rights and elective franchise', "(a) The District courts shall have orignal jurisdiction of any civil action authorized by law to be commenced by any person: (1) To recover damages for injury to his person, or property, or because of the deprivation of any right or privlage of a citizen of the United States, by any act done in furtherance of any conspiracy metioned in section 1985 of title 42; (2) To recover damages from any person who fails to prevent or aid in preventing wrongs metioned in section 1985 of title 42, which he had knowledge were about to occur and power to provent; (3) to redress the deprivation under color of any state law, statute, ordinance, regualtion, custom or usage of any right, privlange or immunity secured by the Constution of the Untied States or by any act of congress providing for equal rights of citizens or of all persons within the jurisdiction of the Untied States; (4) To recover damages or to secure equitable or other relief under any act of congress providing for the protection of civil rights, including the right to vote".

11.) Title 28, U.S.C., Section 1357, injuries under Federal Laws, "The district court shall have orignal jurisdiction of any civil action commenced by any person to recover damages for any injury to his person, or property, on account of any act done by him, under any act of congress, for the protection or collection of any of the revenues or to enforce the right of citizens of the United States to vote in any State".

12.) Title 28, U.S.C., Section 1367, Supplemental Jurisdiction, "(a) Except as provided in subsection (b) and (c) or as expressivally provided otherwise by Federal Statute, in any civil action of which the district courts have orignal jurisdiction, the district courts shall have supplemental jurisdiction over all other claims that are so related to claims in the action within such orignal jurisdiction that they form part of the same case or controversy under article III of the United States Constution. such supplemental jurisdiction shall include claims that invovle the joiner or intrvention of additional parties".

13.) Title 18 U.S.C.A., Crimes and criminal procedure, part 1 crimes, chapter 13, section 241 conspiracy agiasnt rights', "If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any state, territory, commonwelth, posession, or district, in the free excersise or enjoyment of any right or privlage secured to him by the Constution or laws of the United States, or because of his having so excersised the same or if two or more persons go in disguise on the highway, or on the premsis of another, with the intent to hinder his free excersise or enjoyment of any right pr privlage so secured, they shall be fined under this title or imprisoned not more than ten years or both, and if death results from the acts committed in violation of this section, or if such acts include kidnapping, or an attempt to kidnap, agravated ssexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill they shall be fined under this title or imprisioned for any terms of years, or for life, or both, or may be sentanced to death".

14.) 720 I.L.C.S. 5/33-3 'offical miscondcut' "(a) A public officer (which is applicable to any persons in this Rushville Facility, under 720 I.L.C.S. 5/12-3.05 (d) (4) (i) (4) "a peace officer, community policing volunteer, fireman, private security officer, corractional instution employee, or DHS employee sueprvising or controlling Sexually dangerous persons, or sexually violent persons") or employee or special goverment agent committs miscondcut, when, in his offical capacity, as a special government agent he or she commits any of the following acts (1) intentionally or recklessly fails to preform any mandatory duty as required by law to preform, or (2) knowingly preforms an act which he knows is forbidden by law to preform, or (3) with intent to obtain a personal avantage for himself or another, he preforms an act in excess of his lawful authority or (4) solicits or knowingly accepts for the preformance of any act, a fee or reward which he knows is not authorized by law (b) an employee of a law enforcement agency committs miscondcut when he or she knowingly communicates, directly or indirectly information acquired in the course of employment with intent to obstruct, impeade, or prevent the investigation, apprehension, or prosecurition of any criminal offense or person, nothing in this subsection (b) shall be construed to impose lieability for communicating to a confidential resource who is participating or aiding law enforcemnt in a ongoing investigation (c) a public officer or employee or special governemnt agent convicted of violating any provision of this section forfits his or her office or employment or position as a special governemnt agent, in addition committs a class 3 felony".

15.) 720 I.L.C.S. 5/12-21, criminal abuse or neglect of an elderly person, or person with a disability, section: criminal abuse or neglect of an elderly person or person with a disability, Section: 12-21 "a person committs the offense of criminal abuse or neglect of an elderly person or person with a disability, when he or she is a caregiver and he or she knowingly: (1) preforms acts that cause the elderly person or person with a disability's life to be endangered, health to be injured, or preexisting physical or mental condition to deteroriate, or (2) fails to preform acts that he or she knows, or reasonably should know, are necessary to maintain or preserve the life or health of the elderly person or person with a disability, and such failure causes the enderly person or person with a disability's life to be endangered, health to be injured, or pre-existing physical or mental condition to deteroriate, or (4) physically abuses, harasses, intimidates, or interfeares with the personal liberty of the elderly person or person with a disability or exposes the elderly person or person with a disability to willful deprivation".

16.) "Speical Duty doctrine - "the rule that a Governmental entity (such as a State or Municipality) can be held lieable for an indivudal Plaintiffs injury, when the entity owed a duyty to the Plaintiff, but not to the general public, this is an exception to the public duty doctrine, the special duty doctrine applies only when the plaintiff has reasonably relied on the Governmental entity's assumption of the duty".

17.) "Special Relationship Doctrine - "the therory that if a State has assumed control over an indivudal sufficent to triggor an affirmative duty to protect that individual (as in involuntary hosipilitization or custody) then the state may be lieable for the harm inflicted on the indivudal by a third party, this is an exception to the general principle prohibiting members of the public from suing state employees for failing to protect them from third parties".

18.) "Governemnt Laws Doctrine - "the doctrine that the Government must operate according to established consistant legal principals and not according to the interists of those who happen to be in power at any given time, esp, the doctrine that judical decisions must be based on the law, regardless of the charactor of the litigants or the personal predilections of the judge".

19.) "Stare Decisis - "The doctrine of precident under which a court must follow earlier judical decisions when the same point arises again in litigation, the rule adherance to judical precidents finds its expression in the doctrine of stare decisis, this doctrine is simpply that when a point or principle of law has once been offically decided or settled by the ruling of a competant court in a case in which it is directly and necessary invovled, it will no longer be considered as open to examination or a new ruling by the same tribunal or by those which bound to follow its adjudications, unless it be for urgent reasonings, and in exceptional cases".

20.) Body of Principals for the Protection of All Persons Under Any Form of Detention or imprisionment, Principle 7.2 "States should prohibit, by law, any act countrary to the rights and duties contained in these principals, make any act subject to apprroapite sanctions, and condcut, imparital investigations, upon complaints. The Term cruel and inhumane or degrading treatment or punishment sould be interpreted so as to extend the widest possible protection agianst abuses or imprisioned persons in conditions which deprive him, temproally or permantally of the use of his natural senses, such as sight, hearing, of his awarness of place and the passing of time".

21.) Local Rule of Federal Rules Of Civil Procedure, 7.1 (d) (pt. 6) (Exception) "local rule 7.1 (d) [requiring plaintiff to respond to each material fact, in summary judgent, otherwise will be deemed an omission of the fact] does not apply to pro-se litigants, social security appeals, or any other case upon the showing of good cause".

22.) DeWalt V. Carter 224 f 3d 607 612 (7th cir 2000) (headnote #15) "An Act taken in retalaition for excersise of a constutionally protected right, violates the Constution".

23.) Griffin V. County School Bd Of Prince Edward County 377 U.S. 218 84 s ct 1226 (headnote #12) "constutional principals cannot yeald simply because of disagreement with them".

24.) Boltzman V. Schlissinger 414 U.S. 1304 94 s ct 1 (1973) (Headnote #11) "United States Constution ensures that the law will untimatly prevail, but it also requires that the law be applied in accordance with lawful procedures".

25.) Koontz V. St. Johns River Water Managment District 570 U.S. 595 133 s ct 2568 (2013) (headnote #2) "The Unconstutional Conditions Doctrine vindicates the Constutions enumerated rights, by preventing the Government from coercing people into giving them up"; (Headnote #3) "regardless of whether the Government ultimatlly suceeds in pressuring someone into forfitting a Constutional right, the Unconstutional Conditions Doctrine forbids burdoning the Constution enumerated rights by coersively witholding such benifits"; (headnote #1) "the Government may not benifit to a person because he excersises a Constutional Right".

26.) Martin V. Hunters Lessee 14 U.S. 304 1816 WL 1721 1 ed 97 (headnote #10) "The Government of the United States can claim no powers which are not granted to it by the Constution".

27.) Governer V. Lt. Governer 193 Ill 2d 467 Ill Dec 131 444 N.E. 2d 170 (1983) (also cited in Blacks Law Dictionary) "The Governemnt Laws Doctrine - the doctrine that the Government Must operate according to established consistant legal principals and not according to the interists of those who

happen to be in power at any given time, esp, the doctrine that judical decisions must be based on the law, regardless of the charactor of the litigants, or the pesonal prediletions of the judge".

28.) Hufford V. McEnaney 2000 WL 536847 *n7 (9th Cir 2001) (Quoting Brewster V. Board of Edcuation 149 f 3d 971 982 9th cir 1998)) "Held that the procedural component of the due process clause requires the government to act in a manner which is fair and just, if it does anything that directly affects a person or his/her property, a procedural due process claim has two distinct elements (1) a deprivation of a constutionally protected liberty interist, and (2) a denial of adewuate procedural protections".

29.) Kikumura V. Turner 28 f 3d 592 (7th cir 1994) (headnote #2) "officals voluntary cessation from engaging in conduct as unconstutional, does not render a case moot".

30.) People Ex Rel Miller V. Holtz 327 Ill 433 (1927) (headnote #2) "every citizen is bound to obey the Constution, and every Court is bound to enforce its provisions".

31.) Sorrell V. IMS Health Inc 564 U.S. 552 131 s ct 2653 (2011) (headnote #22) "the First Amendmsnt directs courts to be especially skeptical of reguatlions that seek to keep people in the dark for what the Government Precieves to be their own good".

32.) Stanley V. Illinois 405 U.S. 547 92 s ct 1208 (1972) "the court has however not embraced the general proposition that if a wrong can be done, it can be undone".

33.) San Diego Citizens For Quality Edciation V. Barrera 2018 WL 4599700 (headnote #31) "voluntary cessation of purportedly unlawful conduct does not ordinarly render a case moot".

34.) U.S. V. Phosphate Export 393 U.S. 199 89 s ct 361 (1968) (headnote #3) "a case may become moot if subsequent events make it absolutly clear that the alledgly wrongful behavior would not be reasonably expected to recur".

35.) Friends of the Earth Inc V. Laidlaw Envtl. Servs, Inc 528 U.S. 167 189 120 s ct 693 145 L ed 2d 610 (2000) "make it absolutly clear that the alledgly wrong behavior could not reasonable be expected to recur"; "There is no reasonable expectation that the wrong will be repeated".

36.) Weeks V. Hodges 871 f supp 2d 811 (N.D. Ind 2012) (headnote #18) "express policy therory of municipal lieability under section 1983 applies with a plaintiff can point to an explicit policy or omission in policy that vioalites the Constutional Right".

37.) Citizens United V. Federal Election Commission 558 U.S. 310 130 s ct 872 (2010) (headnote #16) "Supreme Court precident is to be respected by the court, unless the most convincing of reasonings demonstrate that adherance to it puts the court on a couse that is sure error"; (headnote #17) "bayond workability the relevant factors in deciding whether to adhere to the principle of stare decisis includes the antiquity of the precident, the reliance interists at stake and whether the decision was well reasoned".

38.) Ogden V. Atterholt 606 f 3d 355 356 (7th cir 2018) "in dtermining whether summary judmgent is apprrorpaite, the deciding court must construe all facts in light most favorable to the non moving party and draw all reasonable inferances in that parties favor".

39.) Brown V. Burlington 765 f 3d 765 (7th cir 2014) [5-8] "Daubert laied out four factors by which cours can evualte the realiablity of expert testimony (1) Whether the esperts conclusions are falsfied (2) whether the experts method has been subject to peer review (3) Whether there is an error rate with the technique and (4) whether the method is generally accepted in the relevant scientific community (Citing Daubert V. Merrell Dow Pharmaceuticals Inc 509 U.S. 579 (1933))

40.) Carter V. Carter 298 U.S. 56 s ct 855 (1936) (headnote #7) "powers which generally Government may excersise are only those speffically enumerated in Constution and such implied powers are necessary and proper to carry into effect enumerated powers and whether end sought to be attained by act of congress is legimate is wholly a matter of Constutional Power and Not Legislative Discression which begins with choice of means and ends with adoption of methods and details to carry deligated powers into effect".

41.) Brisby V. Schultz 487 U.S. 475 98 s ct 2495 (1988) "there may be an apprropaite proxy but the State has to provide some evidnace beyond conclusionary assertions to justify its regualtions".

42.) In Re M.H. 196 Ill 2d 356 362 256 Ill Dec 297 751 N.E. 2d 1134 (2001) "the due process clause Guarantees more than fairness, it also provides hightned protection against government interfearance with certain fundamental rights and liberty interists (See also: Washington V. Glucksburg 521 U.S. 702 719-20 117 s ct 2258 2267 (1917)).

43.) People V. Thorpe 52 Ill App 3d 576 367 N.E. 2d 960 (1977) (headnote #6) "decisions of an appellate court are binding on all circuit courts, regardless of locale".

44.) People V. Leavitt 2014 Ill App 1st 22 N.E. 3d 430 (headnote #13) "alough the appellate court is not bound to follow decisions by the federal courts, other than United States Supreme Court, such

decisions may be considered persuasive authority".

45.) Louisana V. Naacp 366 U.S. 293 297 81 s ct 1333 (1961) (headnote #6) "eventhough Governmental Purpouse may be legimate and substantial, the purpouse cannot be presued by means that broadly stiffle fundamental personal liberties when the end can be more narrowly drawn".

46.) Schultz V. Illinois 237 Ill 2d 391 930 N.E. 2d 943 341 Ill Dec 429 (2010) "court must interpret and apply statutes in the manner in which they are written and cannot re-write them to make them consistant with their own idea of orderliness and public policy".

48.) Waldridge V. American Hoechst 24 f 3d 918 (7th cir 1992) "summary judgment is not a vechile for resolving factual disputes".

49.) Collignon V. Milwaukee City 163 f 3d 982 989 (7th cir 1998) "that the professional knew of the seerous medical need, and (2) disregarded that need, knowledge can be proven if the trier of fact can conclude the plaintiffs medical need was obvious"; "then Plaintiff must prove that the treatment decision, by the treatment professionals was a substantial departure from the accepted professional standard".

50.) Michael Hughes V. James Dimas et al U.S.C.D. No: 4:15-cv-04163-JES; Appeal No: 16-1818 (pg. 3) "the Supreme Court Understands that the Fourteenth Amendment to require that Civil Detainees recieve treatment for the disorders that led to their confinment and be released when they've improved enough to no longer be dangerous (225 ILCS 109/40; 725 ILCS 207/55 (a)-(b)) "that the decision can be understood as a response to doubts increasingly raised about the constutional adequacy of the treatment provided to civilly detained sex offenders; "the Constutionality of Civil Committment and the Requirment of adequate treatment see: (49 Boston College Law Review 1383 (2008); Karsjens V. Jesson 109 f supp 3d 1139 1172 (d. Minn 2015))".

51.) Karsjens V. Piper (Appeal No: 15-3485) (Amicus Curie) (Page 18, last paragraph) "Following the Supreme Courts Decision in County Of Sacramento V. Lewis 523 U.S. 833 (1998) this court held to prevail on an as-applied due process claim, that the States defendants' actions violated the plaintiffs' substantiative due process rights, the plaintiff "must demoantrate both that the [state defendants] conduct was conscience-shocking, and that the [state defendants] violated one or more fundamental rights that are 'deeply rooted in this Nations' history and tradition and implicit in the concept of ordered liberty, such that the neither liberty nor justice would exist if they were sacrificed" (page 19) "as indicated above however, the court should determine both whether the state defendants actions were

consciance-shocking and if those actions violated a fundamental liberty interist. To determine if the actions were Conscience-Shocking the district court should considerr whether the state defendants actions were "egregious or outragious" See Montin V. Gibson 718 f 3d 752 755 (8th cir 2013) (quoting Burton V. Richmond 370 f 3d 723 729 (8th cir 2004). To meet this high standard we have explained that the alleged substantive due process violations must involve conduct "so severe ... so disproportionate to the need present, and ... so inspired by malice or sadism rather than a merely careless or unwise excess of zeal that it amounted to a brutal and inhumane abuse of offical powar literally shocking to the conscience" Moran 926 f 3d at 647 (quoting In Re Scott Cnty Master Docket 672 f supp 1152 1166 (D. Minn 1987). Accordinagly the district court applied an incorrect standard in cosidering the class plaintiffs as applied substantive due process claims".

52.) Cameron V. Tomes 783 f supp 1511 1524-25 (D. Mass 1992) (headnote #3) "challanges to conditions of confinment by convicted sex offender who was confined indefinetly in State Treatment Center for the Sexually Dangarous, ware most appropriatly analyzed under the due process clause requiring conditions that did not fall below minimal standards of civilized diecancy, alough offenders prision santances would expire in aproxemetly nine years, his confinment in treatment center was indefinate and needsly worsning his mental conditions that he might well be confined long after his sentance expired".

53.) Brown V. Plata 563 U.S. 493 (headnote #34) "a court invokes equitys power to remedy a Constutional violation by an injunction mandating systemic changes to an isntution, has the duty and responsibility to assess the efficacy and conquanses of its order".

54.) Babcock V. White 102 f 3d 267 (7th cir 1996) (headnote #3) "prisioner may maintain suit against prision officals alledging that officals took action agiasnt prisioner in retaliation for prisioners excersise of first amendment rights to petition redress of grievances, eventhough actions complained of by prisioner did not independantly violate the constution".

55.) Bracy V. Grondin 712 f 3d 1012 (7th cir 2013) (headnote #4) "even if district court abused its discression in denying motion for appoinment of counsel under the informa Pauperis (IFP) statute, an appellate court can reverse when the absence of counsel prejudicated the litigant which requires a reasonable likelyhood that the presance of counsel would have made a differance in the outcome of the litigation".

56.) willis V. Palmer 175 f supp 3d 1081 1106 N.D. Iowa (Mar 20 2016) (Headnote #12) "consciance shocking standard rather than professional judgment standard applied in determining whether treatment recieved by civilly committed sex offenders violated substantiative due process"; (headnote #13) "genuine

issue of material fact regards whether quality of sex offender treatment recieved by long term sex offender patients committed to civil committment at a state hosipital under state statute chocked the conscience precluded summary jdugment in favor of head of Iowa department of Human Services, formar administratior of treatment program and various indivdal treatment providers in patients section 1983 action alledging violation of Fourteenth Amendment".

57.) Miranda V. Cty Of Lake 900 f 3d 355 (that objective unreasonableness standard applies, opposed to courts relying of professional jdugment of the treatment professionals).

58.) Turay V. Seeling 108 f 2d 1148 (9th cir 2004) (headnote) "due process clause of United States Constution Required State officals to provide civilly committed sexually violent persons with acess to mental halath treatment that gave them relistic oppurnuity to be cured or to improve condition which they are confined".

59.) Ohlinger V. Watson 652 f 2d 775 (8th cir 1980) (Headnote #1) "those persons convicted of a criminal sex offense and given intermadiate life sentacnes, on basis of mental illness are entitled to Constutionally adequate treatment for those sex offenders committed in civil proceedings"; "Adequate and effective treatment is Constutionally required because absent treatment appellants could be held indefinatly as a result of their mental illness".

60.) Johnson V. Rimmer 936 f 3d at 707 (citing Youngberg V., Romeo 457 U.S. 307 321 s ct 2542 731 l ed 28 (1982) "this review is differential, professionals decision is presumptivaly valid and lieability may be imposed, only when decision by the professional is such a substantial departure from accepted professional judgment or practice or standards to determine that the person responsible actually did not base the decision on such a judmgent".

61.) Jackson V. County of McLean 953 f 2d 1070 1073 (7th cir 1992) (it will probaly be necessary to present a medical expert witness or to cross examine medical witnesses called by the defendants, or both, the presance of medical or other issues requiring expert testimony supports the appointment of counsel"); ("it should have been apparent from the onset that Jackson needed the expert testimony of a physican or halath professional to prove two essetial elements of his claim, the accepted professional practice regarding the use of restraints and that the restraints used at the McLean jail constutited a substantial departure from the accepted professional practice.... in short the lack of legal representation placed Jackson at a searous disavantage comunted with an adversary who took avantage over the situation... we therefore hold that the District Court abused its Discression in failing to grant Jacksons request for Counsel under section 1915 (d)".

62.) Sain V. Wood 512 f 3d 886 895 (7th cir 2009) (also cited in Youngberg V. Romeo 457 U.S. 307 323 (1982) "such substantial departure from accepted professional judgment, practice, or standards, as to demosntrate that the person responsible actually did not base the decision on such a judgment".

63.) Johnson V. U.S. 565 77 s ct 550 (1957) (headnote #1) "certification by judge presiding at trial that appeal of one seeking to appeal In Forma Pauperis is not taken in Good Faith carries great weight, but is not final or conclusive, and does not preclude convicted defendant from showing that certification was not unwaranted and that appeal should be allowed, and upon proper showing court of appeals must displace district courts certification (28 U.S.C. sectionn 1915); (Headnote #2) "Where defendant seeking to appeal In Forma Pauperis challanges cetification by trial judge that appeal from conviction is not taken in good faith, court of arpeals must afford defendant the aid of counsel, unless he inissits on acting as his own counsel and either defendant or his assigned counsel must be enabled to show that grounds seeking appeal are not frivilous, and do not justify finding that appeal is nto sopght in good faith".

64.) Pate V. Stevens 163 f 3d 437 (7th cir 1998) (headnote #3) "district court should not apply an innapropriatly high standard when determining whether a prisioners appeal was taken in good faith, for purpouses of prisioenrs application to proceede In Forma pauperis".

65.) Johnson V. Johnson 385 f 3d 503 524 "officals knowledge of risk can be proven through circumstanal evidnace demonstrating that risk was so obvious that the offical must nave known about it".

66.) Smith V. Rowel f 2d 360 360 (7th cir 1985) "correctional supervisions may be liesble for failing to correct unconstutional conditions or practices within their area of authority if they know, or should have known about them, officals may also be held liesble if they are informed of due process violations in other ways and fail to act on them, sueprvisiory accountability and responsibility can be shown in the following factors (1) the defendant participated directly in vioaltion of rights or (2) the defendant, after being informed via report, appeal, grievance, letter, etc, failed to remedy the wrong or (3) the defendant created a policy or custom under which unconstutional practices occured or were allowed to continue to occur via that policy or custom, (4) the defendant was grossly negligant in supervision of his or her subordiantes, who committed the acts, supported, or covered up, the acts (5) the defendant demonstrated deliebrate indifferance to the rights of plaintiffs by failing to act on information indicating that unconstutional acts were occuring, or ppotentially occuring".

67.) Hildebrandt V. Illinois Dept. of Natrual Resources 347 f 3d 1014 1039 (7th cir 2003) (an offical satasfies the personal responsibility requirment of section 1983 if the conduct causeing the constutional deprivation occurs at his direction or with his knowledge and concent, that is he must know

about the conduct, facilitate it, approve it, condone it, or turn a blind eye to it".

68'.) Plaintiffs entitlement to invoke joiners, and continous vioaltions of defendants, and enjoin non defendants, because of haivng participated, in continuing the inital violations: U.S. LLC V. Kim 385 f supp 3d 600 N.E. Ill (2019) (headnote #6) "in detezmining whether the doctrine of ex-parte young applies, a court need only to conduct a stzightfoward inquiry into whether the compolaint alledges a ongoing violation of federal law, and seeks releif properly charactorized as prosepective".

69.) Also by: Heard V. Sheahan 253 f 3d 316 320 (7th cir 2001) (adopting defendants that continue to vioalte rights under section 1983); (Continued violations exist if the defendants at any time ceased their wrongful condcut, further injury [not avoiding inital injury, inital injury still exists] would ahve been avoided); ("a vioaltion is called continuing signifying that a plaintiff can reach back to its beginings, even if that begining lies outside the statutory limtiations perriod when it would be unreasonable to require or even premit him to sue seperatly over every incident of defendants wrongful actions").

70.) Murphy V. Smith 844 f 3d 663 (7th cir 2016) (headnote #9) "federal rule under ex-parte young allows suits for injunctive relief or declatory relief to require state officals to comply with federal law".

71.) U.S. V. Von Behren 822 f 3d 898 (2008) (headnote #11) "Governments threat to seek revocation of defendants supervised release if he failed to compleate sex offender treatment program which required him to awnser incriminating questions in sexual history polygraph, constituted unconstutional compulsion under the fifth amendment defendant had affirmatively asserted his privlage against self incrimination, fact that court would be revoking defendants supervised release for failure to compleate treatment, not refusal to incriminate himself was a distinction without differance, because he was unable to compleate treatment as a direct result of the invocation of his rights and it was irrevlant that the court never actually revoked his release as defendant was compelled in the moment, the government threatned him with a substantial penality (28 U.S.C.A. Const Amend 5) (U.S. V. Calvert-Cata 2017 WL 478597; Bennett V. Bigelow 387 f 3d 1016 1027 Utah (2016))"

72.) Illinois Admistrative Code, Title 20, Section 1905.80 (b) (1) "risk: Sexual abusers presenting a higher risk of reoffending recieve a greater intensity and dosage of treatment services, while lower risk sexual abusers recieve less. Providing an innaprorpaite intensity of services may negatively affect treatment effectiveness and recidivism risk".

73.) Illinois Adminstrative Code, Title 20, Section 1905.100 (a) (7) "Treatment providers assist

clients with identifying and enhancing prosocial interists, skills, and behaviors, that the clients themselves seek to enhance or attain (i.e. approach goals that are oriented toward a nonoffending lifestyle), As opposed to strictly focusing on managing innaprorpaite thoughts, interists behaviors and risky situations".

74.) Illinois Admistrative Code, Title 20, Section 1905.100 (b) (3) (C) "Treatment providers are aware that alough clients may hold attitudes, beleifs, and values that are unconventional, but unrelated to their risk for sexually abusive or criminal behaviors, these attitudes, beleifs, and values are not deemed approrpaite primary treatment targets".

75.) Illinois Admientrative Code, Title 20, Section 1905.100 (c) (2) "treatment providers recognize that, alough clients present for sexual abuser spefic treatment as a direct result of legal or other mandates, external motivations alone are generally insufficent for producing long-term change among clients".

76.) Illinois Administrative Code, Title 20, Section 1905.100 (c) (6) "Treatment providers are aware that clients present with differing levels of internal motivation to change (and varied types and levels of denial and minimization related to sexually abusive behavior, interists, arousal and attitudes, and beleifs), but that such characteristics do not preclude acess to treatment".

77.) Illinois Admistrative Code, Title 20, section 1905.100 (c) (7) "treatment providers recognize that denial and minimizarion may impact the clients engagement in treatment, but that influence of denial and minimization on sexual recidivism has not yet been clearly established and may vary among cleant groups".

78.) Illinois Admistrative Code, Title 20, Section 1905.100 (c) (8) "treatment providers support the client in baing honest in discussing the client history and functioning, but acknowledge that it is not the role of treatment providers to attempt to determine or varify a clients legal guilt or innocence, or to coercee confessions of unreported or undected sexually abusive behaviors".

79.) Illinois Administrative Code, Title 20, Section 1905.100 (c) (9) "treamtent providers are aware that attempting to provide treatment for problems that a client presistantly denies, results in having limitations in making realiable clinical recommendations about the indivudals treatment progress and re-offense risk, and that this has ethical implications".

80.) Illinois Admistrative Code, Title 20, Section 1905.110 (d) "treatment providers recognize taht a client who has sucessfully compleated treatment has generally: (3) Demonstrated changes in managing

these thoughts, attitudes, emptions, behaviors, and sexual interists that are sufficentally sustained to create a reasonable assumption that the client reduced the risk to reoffend".

STATEMENT OF THE CASE

This case was filed due to the Defendants, and many other 'treatment team professionals' having failed to issue adequate sex offender treatment to this Plainitff/Petitioner. While doing so, committing many other Constutional and legal, and statutory violations. After this complaint was filed, during its litigation the District court as well as the Seventh Circuit Court of Appeals enganged in many errors, beyond harmless, but amounting to prejudical, bias, judical misconduct and error in manafest while making their rulings, having favored the Defendants in spite of clear, plain, and obvious conflicts as to Constutional, Statutory, and documentations/filings that was already on the record. Such courts also dismissed, and failed to apply clear consttuional violations committed by defendants, contemporaniouslly as to the inital deprivation of 14th Amendment due process.

The Plaintiff/Petitioner had (and still to this filing date) participated in the Rushville Facilitys/ Defendants sex offender treatment program, since 2009. During such years, Plaintiff/Petitioner has been the victim of many, continued, and ongoing constutional, statutory, criminal, felinious acts commited by Defendants and Rushville Facility Clinical Team professionals throught his years of treamtent. This includes, but is in absolutly no way limtied to: having been subjected to deliberate and intentional delaying, and precluding of this Plaintiff from his acess, and progression in the sex offender treatment program, which includes such deliebrate, intentional, claculated, and malicious actions by Defendants and Rushville Facility Clincial Treatment Team Professionals of having predominatly issued, and expected to the Plaintiff of nurmous conflicting goals, expectations. This Dynamic has created to where it makes it impossible for the Plaintiff to ever progress in treamtent. For example, claiming the Plaintiff needs to meet behavioral expectations in order to progress in the next phases of treatment. Then when plaintiff 'meets those' sabatoging him, by imposing that those are no longer necessary, and cannot progress due to not taking responsiblity for his behaviors/sexual offenses (which as this plaintiff will explain, is compleatly false, and fabricated, becuase plaintiff has simply been accused of this, in spite of factual documemtnation that by his written treatment work, took responsibility for nurmous undiscloused offenses, and behaviors etc). Then when Plaintiff has been deemed and evulated as compleating required tasks, and expectations, i.e. taking responsibility, then it gets flipped back around as to accuse the Plaintiff of not meeting behavioral expectations, in spite of still mantaining those positive behaviors, (i.e. cessation of sexually acting out, cessation in rule violations etc).

This, in short, has been the ongoing dynamic of the Plaintiffs treatment since 2009, having approxemetly 4 times over, compleated all his Sex offender treatment work, (since 2011) up to par, of what documemtnations reflect by defenants and other professionals progress notes. However in spite of that, somehow plaintiff has still been continusally required to essetially re-do all his work, claiming that in

the past, had not infact compleated all such work, nor took responsibility for his behaviors, sexual offending behaviors/offenses etc, in spite of prior documentnation indciating otherwise, which was why and was indicated of the Plaintiff being premitted to progress onto other assigments, etc, because of having essetially compleated, took responsibility up to satasfication of treatment team, and group members.

At which point then turned focus back onto plaintiffs behaviors, years past, claiming he is not meeting behavioral expectations. Essetially by re-hashing up prior discussed and 'moved on' issues, to essetially continuesally berade plaintiff with requirments of re-discussing those behaviors, when he had already effectiveally and to the expectations of treamtent team, and group members, as documentnations reflected, in years past, discussed, took responsibility for such. However having re-brought up those issues, essetially mudding the waters with discussions of issues already discussed.

This dynamic has repetivally occured, in this fassion, simply beucasee of the plaintiff being removed from sex offender treatment groups, and or removed from all mental health groups together, then re-placed back in after years of absence, being re-placed back in with compleatly differnt set of treatment team professionals, and group members, that essetially has no prior knowledge of prior progressions of and responsibility takings of and by this plaintiff. Also due to the continous 'change over' of treatment team therapists at this Rushville facility, which has essetially been done, beucasee of what Defendant Jumper calls the program, as labled on his 'tranining manuals' for interns, and post-docteral fellowships as a 'investigative, forensic traning program'. This continous change over, coupled with such so called treatment team professionals has ultimatly created such dynamics, because of newly assigned treatmet professionals not having been knoweldgeable to, and or beucasee of failing to investigate and read all of plaintiffs prior treatment work, filings, progress notes etc. Making any progress he made, years prior, essetially, null and void, and having to start from scratch. Thus making it impossible, as required by 14th Amendment procedduraal due process, and cases like Michael Hughes V. James Dimas; Karsjens V. Jesson; Youngberg V. Romeo; and The Sexually Violent Persons Committment Act 725 ILCS 207; 225 ILCS 109/40; to infact provide, and require more than just some treatment, which the defendants and Courts continsually braged about, that is all thats required having cited Allision V. Snyder, however such cases and laws, set precidence over that standard in Alison V. Snyder simply requiring 'some' treatment, and as well as requiring treatment to be issued by the proffessinals in manners in which allows Plaintiff to progress to improve enough to where he can be released. This standard is also set in the reguatlions, and laws, of standard sex offender treatment reguatlions, in Title 20 Section 1905.80 (b) (1); Title 20 Section 1905.100 (c) (6); Title 20 Section 1905.100 (c) (9).

While Treatment Professionals/defendants have infact, provided 'some' treatment, however the courts are in error beyond harmless, amounting to prejudical, bias, judical misconduct, and error in manafest, by not applying conflicting standards that render these antiquated standards moot, by new standards, requiring sex offender spefic treatment, to be given, in a adequate way, that affords one to be released. The courts failing to apply such precidental standards, rather their own interpreation and decisions, relying on such antiquated legal standards, and professionals judgments, essetially violates

the precidental laws and standards cited above, but in addition, controlling legal standards like GOVERNMENT LAWS DOCTRINE, STARE DECISIS, SPECIAL RELATIONSIP, SPECIAL DUTY DOCTRINES.

The reasoning why such new precidental standards have been set, essetially is because courts and treatment professionals, and evualtiors, simply do not conclude that 'some treatment' i.e. mental health treatment, is not sufficent for considerations of a offenders release, that only sex offender spefic treatment is the premsis of denoting a client to have made substantial, and sufficent progress to be released. For example, plaintiffs participation in what is called ancelory groups, i.e. anger managment, etc, is not sufficent for courts and sex offender treatment professionals/evualtiors to conclude one has made sufficent progress to be released. I.e. requiring progression in sex offender treatment spefic programs, which at this Rushville Facility is only avaible through groups called 'core' or 'disclosure/post disclosure groups'. No other 'ancelory' groups/i.e. mental health treatment group participation affords clients, this plaintiff abilities to recieve any form of sex offender treatment. Such other mental health groups are only identifed in assisting the client in that process, but is not sufficent to call or label as having recieved sex offender spefic treament, nor to have reduced the clients/plaintiffs risk to reoffend through these mental health groups. Thats why antiquated legal standards the court, and defendants brag about, to only afford plaintiff/clients at Rushville Facility 'some' treatment, is essetailly inadewquate.

Plaintiff, when having filed his inital complaint, in the district court, had essetially 'had enough' of defendants, and treatment teams 'screwing him around' in this above concluded methods since 2009.

Plaintiffs suit was initally filed baucase of the Defendants having becoming more brazent in such conduct, having esclated such inital constutional, statutory deprivations, this was because of such concluded situations as explaied as follows:

Plaintiff was re-placed back in disclosure group, under the expectation, as documented by his treatment plans, by Defendant Dobier, as well as many other treatment professionals on his treatment team, to re-present his timeline, to essetially catch the new group up to spead of his offending. This method, alough feasable, does infact create such problems of plaintiff having to re-hash his already presented and approved work, essetailly delaying his progressions, but defendants excuse was, and still is because, they cannot simply allow plaintiff to 'pick up where he left off' because 'the new therapists and group members then wouldent be able to give plaintiff appropaite and meaningful feedback, to his offenses and behaviors, because of not baing knowledgeable of his prior presentations' (agian is a doubble edged sward for the reasonings already mationed). However in spite of plaintiff many suspecions of this process having gone awry over the years past, Defendants continuede to assure plaintiff that all he would need to do is go over his timeline briefly. Plaintiff excalmed, that is not really possible, becuse unlike most residents at this Facility, he cannot simply go over it briefly, his offending is very lengthly, widespread, complex, and conflicting, which prevokes many discussions of resident group members baing confused. For example, Plaintiff has infact gone fron rags to riches, and back and fourth, from being a spoiled brat, to living homeless on the streets in Chicago, which to most residedent group members are

confused on how someone can live that lifestyle becuase most have come from one fixed upbringing. Additionaly, most of Plaintiffs offending has been predominatly exposing, in public areas, or voyering in public restrooms, which has infact caused much contention amongst group members, beucase of most being at this facility for having brutaly raped, or taking avantage of others sexually. Plaintiffs offense style in this fassion essetailly prevokes many group members to become befuddled in this, poking, proding the plaintiff for more information, daleirbatly fustrating him, after many denials, and proofs of police reports that of inquires into methods in which plaintiff did not use in his offendeing, that most others have, i.e. force, rape, etc. This dynamic has essetially caused conflicts in plaintiffs sex offender treatment groups beucase of resident group members being in the selfish unempathic nature, lashing out, and refusing to allow progressions of plaintffs presentations, becuase of him stating things like, under sections of 'minulapation tactics used was waiting in bathrooms for someone attactive'. Others feel that since they had to place writings related to and becuase of feedback plaintiff gave them, of 'having brutally raped another person' becoming essetially spiteful, tring to twist plaintiffs offending into where he would need to place such simular writings, in spite of police reports, and victim statements indicating just as plaintiff took responsibility for. For example, plaintiff had lived with an older person, becuase of plaintiff being homeless, and in that, such person being in his 50's sought out minors to offend also. In one conversation one person overhard plaintffs voice on the phone, and asked to talk to this plaintiff, in which plaintff was asked to pick up this person, and drive him to this house, nearly 70 miles away with intent of sexual interactions. Due to the reports infact refelcted the victim seeking out plaintiff in this regard, group memebrs cant concieve this, and indicated, and badgered plaintiff to state, and write, he kidnapped and raped this person. Esstially the group members 'therory' was that someone cant simply get at this facility for esssstially whats 'statutory rape' by concental sexual interaction, sought out to the Plaintifff, by a minor, and 'had to be something else there'. However infact this is most of plaintffs offending, as undisputed reports refelct.

Plaintiff adamently informed defendants of this 'concern' upon entering the new disclosure group, in spite of such repetive historical events, and even in spite of defendants treatment informing plaintiff that 'if he continusally does the same thing over and over, and getting the same result, do somethign diffemt' that if the 'doing the same thing over and over' is their expectations to re-do his work, which is creating such problems of 'stalling plaintiff out' is the problem, then why cant he 'do somethign diffemt' as they instruct. Again defendants refered to that group members need to be infromed of offending patters to give approrpsite feedback, which then the plaintiff countered, if thats the case, why does 'he' have to to that, under this reasoning, but esetially no other resident has to upon re-entering disclosure, afterbeing removed, or why dosent one have to do this, when phased up to the post disclosure group, which is with other members, that then were residents do their ofending cycle, i.e. learning interveitions, i.e. not having to 're-present all prior offending' 'in order for the group to understand it'.

However Defendant Dobier reassured plaintiff that they would make this process go smoother, than

in years past, however plaintiff agian reitterated, if the process is the problem, and stayes the same, then what will be differnt. Defendant Dobier simply reassured plaintiff to 'trust them'.

Thus in spite of plaintiff many hesitancies, he agreed.

However, upon a few months of entering this disclosure group, this same dynamic once agian seemed to present and manfest itself in the exact same ways. Treatment Professionals, I.e. Defendants Howell, Smith, Sheldon then tried to blame plaintiff as to 'if the process is going the same, he must be doing something to make it that way' essetially redirecting and blaming plaintiff to 'focus on his behaviors and 'not others'. However, in re-explaning this above dynamic, plaintiffs progress notes was falsfied by defendants by simply conclusing writings of 'plaintiff diverts blame onto others instead of taking responsibility for his behaviors, and his part in actions, and situations', without dopcuemnting subsequent circumstances to suport, agian, if that was done, then would identify blame on defendants faulty and non complinet treatment processes, which is concluded by this plaintiff, why defendants intentionally make such conclusionary labels, without subsequnet suporting deetials, facts, discription of circumstnaces.

As this progressed, there was 2 main sitautions that led to Defendants conclusions, to then remove plaintiff of his sex offender treatment group participation, essetially not premitting him to be afforded 'adquate' treatment, in which to where he could be relaeased, only then refering him to mental health groups, as explaiend before. One being that beucsae of these dynamic issues, treatment team professionals/Defendants begun to conclude, plaintiff was not making sufficent progress in the assigment to do a brief review/overview of his timeline. This was calculated on Defendants unrealistic expectations, as compared to as explaiend plaintiffs lengthly ofending history, and patterns, etc. Defendants beelived that it should only take a few months to do that, however agian, as plaintiff premptivally 'warned' them, that it woudlent it woudl take 5 years or more, that was, unless they were going to prevent resident group members from giving or offering feedback, thus its their questions and unabilities to conceptualize plaintiffs counterdicting offending, and lifestyles that creates this process to re-take years, which agian as explaiend earlier of why, which is why defendants conduct of removing, and replacing plaintiff in discolsure groups, essetially is the problem, that creates the lack of progress, as blamed to the plaintiff, as explaiend earlier.

The other matter that came about, is that much of plaintiffs work/presentations became and was allowed to be derailed by the treatment team professionals by group members/residnets sabatoging his assignments that he was told to do with intentional, delierbate, malicious accusations that was knowingly false. Such accusations included nothing related to plaintiffs preseentations, per-se like blaming plaintiff of sexually acting out on the unit, damaging state property, etc. Plaintiff had calmly discussed for months, how these accusations were false, and heresay, and was prefaced on group members malicious intent, as facts and evidnace points to. For example, Plaintiff was accused of sexually acting out, in spite of the fact that plaintiff asked 'when' when group memebrs said 'last night on the unit' when plaintiff asked for video footage to be reviewed to show that he was not on the yard, as claimed he was,

supposeably sexually acting out under the camra, which was irrelvnat, becuase the camra, regardless, would have shown him entering, exiting yard. than accusations turned into sexually acting out with a spefic individual, resident West. This was soly based on 'rumors'. Simply because resident West took a liking to the Plaintiff, and continusaly tried to talk to him, and other residents, including group members, were esetially running a 'sex ring' which either recruites new, younger residnets, or solicits 'foot solidgers' to be 'look outs' and or to 'start drama' agianst any non participants. As a result of Plaintiff being simualr in age, as to Resident West, as opposed to others whom are 20-30 years older from this plaintiff, and resident West, Plaintiff exclamed of why they associate. And further, Plaintiff metioned, that if there was factual proof to those allegations, wouldent it be that group members could even somewhat point to a general timeframe in which for admsitration to review video, to try to show supposed actions of this alledged sexually acting out occuring. However once that was proposed by this plaintiff, many group members deleirhatly lied, and then became 'vague' in their refered to times/days etc, which plaintiff then identifed, thats why, becuase any time plaintiff, and resident west was associating, was intentionally in view of video, which than cant be identifed as unappropaite interactions. These residents had verbalized (outside of group) (but moreso their offending patters and histories aludes to this) that of wanting to recruit resident West into their sex ring, and becuase he rather chroses to associate with this Plaintiff, and not those persons, precieved this plaintiff as a 'threat' to their antics, and offending behaviors. Ironcially, a spefic indiuvdal resident Bice had infact offended, and victimized resident West, by grabbing him in the genatiles, with a held hand, as resident west reported to staff. However when 'this' came up in disclosure group, considerering these dynamics, this resident Bice, was premited, and allowed by other group members, and therapists accepted such, as 'his mistake' becuase he 'was reaching for a card he put in his pocket'. Which plaintiff exclamed that is B***S**t, becuase theres a differnace from a 'brush' versus, a 'held grabbed hand. However Plaintiff esetially was documented and removed, for and accused of 'causing disruptions, and problems and refusing to take and accept feedback, and rather blaming and diverting attention onto others. Again by defendants documetnations, but malicioualy becuase of failign to document these surrounding reasonings, only conclusionary labels.

After that occured, ironcially Resident Bice was progressed in treamtent, labled as 'taking responsibility' and is and has been released on conditional release, simply beucase all prior written documetnations of 'this incidnet' was distroyed agiasnt resident Bice, of resiidlent West's reports, and video footage, resident Bice being premitted to continue sexual victimization, treamtnet professionals claiming and allowing it 'was a mistake'. Regardless of circumstances, fact is plaintiff has no idea and is befuddled at why a victim can claim such, but the abuser is 'let off' with 'claiming it was a mistake' becuase 'of epical acceptance of such'. Which is exactly why plaintiffs anger is so intense in this litigation, of the Rushville Treatment team essetially sabatoging those who want to progress in treatment, and allowing those to progress that essetially 'ease them' or 'pull the wool over their eyes' with 'social colclusions'.

Then focuses of these malicious residnets, turned to plaintiff 'causing disruptions on the unit

he lived on. Agian this same dynamic was at play, and again ironnailly invovles another resident Holingsworth, whom is again released from the program deemed as doing treatment. This was because (agian, dont take plaintiffs word for it, rather such documentnations of their treatment records, and ofthese patters refelcts to such) that resident Vernon was seeking out resident Hollingsworth as a young vulnerable, poor resident, whom, resident Vernon has much finanical resources, and uses that to sexually exploit persons. In this case, resident Hollingsworth. How this invovled this plaintiff, was simply because resident Hollingsworth and Vernon were on the Plaintiffs livign unit. Resident Hollingsworth was in plaintiffs disclosure group, along with resident Vernons Roomate, (agian, ironcialy released) Resident Perroquet. Resident Vernon had made many attempts to talk to this plaintiff, but being 'an older creep' in that regard, plaintiff rejected. This infact is what caused such disruptions, of plaintiff being adamant about not talkign to this person, but Resident Vernon taking offense to that. This manafested itself as to then resident Vernon 'whining' to resident Hollingsworth, and Perroquet, as to why this plaintfif woudlent subject himself to sexual interactions with Resident vernon, because resident vernon even would 'pay' this plaintiff to do so. Again, which is what caused such 'disruptions' of much yelling, cussing, of plaintiff exclaiming he needed to be left alone, and essetially these residnets pressuring plaintiff into tring to 'talk and resolve the situation' when he 'wasnt interisted' because 'he knew the movtive'. This resulted in resident Hollingsworth bringing up, agianst the Plaintiff, in his group, sexually acting out. Which as well as Resident Perroquet. This of course, as explained, didnt occur, and as can be seen on video didnt occur, as plaintiff pleaded to be reviewed, but staff, and defendants refused. And when plaintiff was blamed as for then tring to rather discuss his invovlement, and when he explained that was baucase he refused to sexually act out, for these reasonings that such accusations was simply because of the group members tring to cover up their condcut, to blame plaintiff, and thus resulting in either 1 of 2 possibilities. 1 being to instill doubt in the treatment team defendants, resulting in plaintiffs removal anyhow, for accusations then of 'him refusing to take resposnibility'. or 2, antigonizing plaintiff with countless rentless accusations, inciting anger in him, lashing out, leading to him being removed anyhow. However defendants, refused to document facts, rather continuted to document conclusionary labels, and also refused to investigate the matter, i.e. video to prove that it infact was others, as plaintiff blamed, and not him.

Then as Defendants after months, of yelling, cussing, screaming, in such groups, which ironcially, plaintiff was advised to 'be and remain calm. Again, plaintiff pleaded, how is that going to fix the problem, his calmness, will not remove this. Plus coupled with, when plaintiff was then accused of 'monaplizing groups time' with 'such dicussions' in spite of than being forced to talk about it, because as documentned, but then conflicts with 'shutting down, and not speeking' which clearly aludes to this problem, and cover ups. How can plaintiff 'monalipize groups time, and then 'shut down'??, This was prefaced on the fact that it was agreed (or so plaintiff thought) that the previous day, that since the wole group time was spent discussing the matters, that the follwing day, it woudlent be discussed, and plaintff needs to stop discussing such. However, the problem why plaintiff cannot do that, is simply

because group members inventionally arived at group, the very next morning, 10 minutes early, to preemptivally bring up and discuss new false accusations. Which upon plaintiffs entering, was then bombarded with questions to awnser of such false accusations. When he refused, claiming 'he thought we were not going to discuss me today'. That then plaintiff got blamed by treatment professionals, in written documentnations as 'diverting onto others, and refusing to take responsibility'. Then when, in the same day, and same group session, plaintiff was urged by treatment team to follow their direction to discuse the matters, then conflicted documentnations stated that 'continued to monalipize groups time, with focusing on situations and blameing others when he was redirected to not do this'.

After plaintiff finally stormed out, in fustration, by being intentionally and deleirbatly entrapped by this regard , and the so called treatment professionals being minulpated by other non professional group members, to entertain such discussions, without facts, evidance. Then Plaintiff was called in a few days later, agian to discuss missing metal pieces out of the units microwave. In spite of a shakedown of plaintiff, and in spite of numuous irate behaviors by Resident Perroquet, and Vernon alledging, the plaintiff still has this metal piece and will use it to shank someone and inspite of then video footage proving resident perroquet having been seen taking 'somthign shiny out of the microwave' and 'throwing it in the units trash' and then incident reports and records of this situation beind distroyed (yet plaintiff still has affidavits of impartial resident witnesses to these events in spite of such documentns seemingly being distroyed, because of defendants, and courts being or claiming ignorance now to these issues). Plaintiff was still blamed as behavirally outburating onto others, blaming others, refusing to take/accept responsibility for his actions and beahviors. Agian as by conclusionary documentnations by defendants, absent of 'what those exact behaviors, and siotuations of dates events, times, residners invovved, and any corrlating evidnace, like incidnet reprorts, or video footage. (which ironcially in e-mails plaintiff retained in discovery, defendant dobier metioned of recieving reports, that plaintiff was hiding under camra sexually acting out, but ironnailly, no 'reports' i.e. staff incidnet reports, are found, again, only 'resident hearsay, which then, why were such residents not written up for lieing to staff, why, plaintiff awnsers, so defendants, and state attorney could progress them in treatment and hide these beahviors, and release them, endangering community/society, under the guise, that to justify programs existance, claiming when they reoffend, or vicalte c.r. rules was 'the residnets choice' not because, as facts prove, because of inadaquate, and flasfied treatment progressions, rather treatment professionals, and facility staff concealing such, allowing such progressions, because otherwise would identify such staffs lack of professionalism, to avoid that, blame residnts, or ignore events in this regard, of how such was mishandled, and rather encouraging residnets, as treatment motto's are as reflected in e-mails in discovery prove 'for the resident to get out, and be free, and not be right' I.e distrubingly that no emphisis on 'not reoffending, rather only 'to get out' by 'any means necessary, even as given rise to, by minulapating the system, and casing the treatment in such regards).

Ultimatlly, plaintiff was then removed from disclosure group, placed in mentoring groups under the premsis that by Defendant Dobier, to compleate assigments, to the treatemt teams satasfication. Most

of these wasnt a problem for the plaintiff. That is, untill, he noted that by defendant Dobiers instructions this wouldent take more than 2 months (aprox) after about 4 months, plaintiff filed a grievance, indicating their lack of compleince.

Then Plaintiff was given a assigment to 'essetially omit to 2 sexually acting out incidnets, one most recent, in the last year, and one most seaerous". Plaintiff then wrote on it, stating he couldent compleate it, baucase it requires him to lie, omiting to bahaviors he didnt do, i.e sexually acting out within the last year. Defendant Dobier falsfied this, by blaming plaintiff, stating, he refused to compleate the assigment, and reufsed to take respoanibility. Plaintiff greived this, indiciating this issue. Grievance resposne simply was denying this spefic assignemnt was given. Then Plaintiff submitted the handwritten assigment that stated exactly as plaintiff claiemd, that defendants just lied about, blaming plaintiff as to not accepting resposnibility, and not doing assigments, again, being conclusive, without stating spefics, agian, withotu staitng that plaintiff refused baucase they required omission of lies, i.e. omiting to more sexually acting out, and in recent timeframes, opposed to what plaintiff actually did (this was based on these prior discusseed/explaiend accusations, that defnedants had to make their 'informents information correct, and subjected plaintiff to these pressuings to do so', which also violaltes plaintfifs 5th amendment constutional rights, and as well as Title 20 Section 1905.100 (c) (8). After plaintiff submittted such proof that treatment team was lieing, and requring plaintfif to admit to lies. Then Defendants despreatly tried to claim, and deny they ever required such omissions by plaintiff, but again, docuemtned proof, as submitted and plaintiff still has as produced in discovery, and more that wasnt shows otherwise. Then Defendants claimed as a 'collective treatment team decision plaintiff was going to be remved from all groups till he decided that he wants to take responsibility, quit filing grievances etc'. This now adds another constutional vioaltion, of harassment and retalaition (i.e. removing plaintiff from groups not alllwing his treatment preparpication, becuase of his grievance activity). Plus, in conflict to courts, aß defendants claims (in summary judgemnt) that (paraphrased) Plaintiff has always been given 'some (mental health) treatment'. Plaintiff pointed to spefic documentation in summary judgment, to where (via e-mails by Defendant Dobier) plaintiff was 'removed from all group participation. This clearly means that Plaintiff at such points, was not even given 'some treatment' as courts and Defendants Attorney braggs about, is required by antiquated legal standards that they use to justify defendants actions having used, predominatly Alison V. Snyder to establish such. But agian defendants own omissions, in docuemtnations in this litigation, proves that the Plaintiff has not been given the entitlement to 'some treatment' as even they brag about, is minimally required. Based on such, how can courts claim that defendants committed no vioaltions, when clearly proof/evidnace says and points to such. Hence courts findings, in that regard, is falsefied, and with deliberate and intentional error, beyond harmless, but amounting to prejudical, bias, judical miscoincut, and error in manafest.

Since then, Plaintiff has remained in 'mental health' groups, i.e. speffically only 1,' that being power to chagne group. Which by these facts, and circumstances, even as omited by defendants, supposeably puts plaintiff at - nigher risk to reoffend. Yet, if thats the facual case, as they claim, then by standard sex offender treatment reguatlions I.e. TITLE 20 Section 1905.80 (b) (1) plaintiff shall

be recieveing 'more' treatment, not less, by removing him from disclosure, sex offender spefic treatment, and only premitting him atttandance, and participation in one mental health group, power to change, which meets half the hours per week that disclosure group meets.

Further, defendants, and any other treatment team professionals, have, in this timeframe, predominatly relied, on and focused on 'plaintiffs behavioral managment' as reasonings to justify and blame onto plaintiff, as to why he is not progressing in treatment. However defendants treatment issuings that are soly based on 'behavioral managment' is infact identifed as not sufficent to produce long term changes among clients. Title 20 section 1905.100 (c) (2) as well in Title 20 Section 1905.100 (c) (6); Title 20 Section 1905.100 (b) (C); Title 20 Section 1905.100 (a) (7); Title 20 Section 1905.110 (d) (3). Having said that, Defendants, and other non parties, which courts dismissed, but is entitled to be included, under continous violations dostrines, as cited in Heard V. Sheahan, infact countrary to courts rulings, does in fact meat the 'daubert' test under Daubert V. Merrell Dow Pharamaceuticals; Brown V. Burlington which infact that defendants professional judgments were infact falsfied, and not based on standard practices, rather a substantial departure from them. Courts, however, as well as defendants acted with judical misconduct, bias, prejudice, error in manafest, in their 'summary judgment order' claiming of a not quoted part of title 20 section 1905 by the Plaintiff, to circumvent their liesbility and falsfiy the record, by claiming that their part of title 20 section 1905, dosent spefics the methods of treatment defendants are required to issue. However courts, in their Summary Judgment order, falsfies this because of misquoting the part of title 20 section 1905 plaintiff did. Courts quoted a part plaintiff did not. Infact plaintiff then gave spefic document and page number, and paragraph number, in which was already filed to the court, in his summary judgment response, that of the sections of title 20 1905 that he refered to, which was not what the court said. Plus, the court also falsfied, errored in manafest, prejidicating this plaintiff, deleirbatly, by claiming he never claimed defendants documentations and records were false, however, once agian, plaintiff pointed appellate courts to where there was the spefic parts, in his summary judgment responses where he speffically said that, by stating defendants lied. As well in the multiple instances of defendants falsfied documentations, and records, by such conflicting decisions, and records, based on same circumstances, and situations as plaintiff predominatly explained in so far. In spite of that factual evidnece, on record, of courts rulings are intentional and deleirbate falsefied, and prejudicating this plaintiff, to intentionally, deliebratly rule in favor of defendants, to avoid their liesability, then essecially 'adds' to the problem, of then creating judical misconduct, bias, prejudice, error in manafest, by failing to comply with legal standards, and controlling laws, that obligate courts to rule by law, not based on what they beslive, not based on defendants professional judgments, not based on public policy/orderliness. This is required: Speical releationship, special duty, Government Laws Doctrines, Stare Decisis, Griffin V. County School Bd Of Prince Edward County; Holtzman V. Schlissinger, Koontz V. St. Johns River Water Managment District, Martin V. Hunters Lessee, Weeks V. Hodges, Citizens United V. Federal Election Commission, Ogden V. Atterholt, Brown V. Burlington, Daubert

V. Merrell Dow Pharamacuticals, Carter V. Carter, Frisby V. Schultz, In Re M.H., Washington V. Glucksburd, People V. Thorpe, People V. Leavitt, Louisanna V. Naacp, Schultz V. Illinois, Waldridge V. American Hoechst, Collignon V. Milwaukee cty, Michael Hughes V. James Dimas, 225 ILCS 109/40, 725 ILCS 207/55, Karsjens V. Jesson, Cameron V. Tones, Brown V. Plata, Babcock V. White, willis V. Palmer, Miranda V. Cty of Lake, Turay V. Seeling, Ohlinger V. Watson, Johnson V. Rimmer, Sain V. Wood, U.S. LIC V. Kim, Heard V. Sheahan, Murphy V. Smith, U.S. V. Von Behren, U.S. V. Calvert-Cats.

Courts also seemed to allow defendants to prevail, on the simple parmaters that they corrected the conduct, however, the irony is that, (1) courts cannot simply render case moot, i.e. allowing defendants to prevail, simply becuase they ceased the conduct, and (2) it must be absolutly clear, that the conduct couldent possibly recur. Considering many of these factors, of defendants boasting about usages of 'professional jdugments' which then is allowance for the possibility for such to recurr, under the guise of 'changes in their judmgents/discression, and simply becuase of the unrealiability of the resident group memebrs, bringing in and their treatment program being allowed and to entertain dynamics of 'behaviors' even false/hearsay ones, in clear conflict to standard sex offender treatment regualtions, of title 20 section 1905, in the sections metioned in so far, clearly the 'same issue could and is infact likely to occur. Hence, courts allowing defendnats to prevail, essetially rendering the case moot, then violates and fails to comply with legal standards established in Kikumura V. Turner, People Ex Rel Miller V. Holtz, Sorrell V. IMS Health Inc, Stanley V. Illinois, San diego Citizens For Quality Education V. Barrera, U.S. V. Phosphate Export, Friends of the Earth Inc V. Laidlaw Evtl Servs Inc, Schultz V. Illinois.

Throught the litgiation, plaintiff filed proof that additional, non defendant treatment providers, continued to enagage in condcut, while hiding behind the 'professional jdugment' that contineud to violate such rights, and substantially departed from standard sex offender treatment reguatlions standards in title 20 section 1905, while issuing treatment to the plaintiff in which plaintiff is entitled to enjoiners, which court denied, essetially continuing their judical misconduct, prejudice, bias, and error in manafest, by then not complying with the legal standards requiring enjoiners of parsons whom continue to violate rights of plaintiff, not needing for him to sue seperatly over every seperate incident: Heard V. Sheahan.

Courts also failed to comply with their own Local Rules Of Federal Rules Of Civil Procedres, Rule 7.1 (d) (pt 6) (exceptions), Ogden V. Atterholt, by granting summary judgment in favor of defendants, having relied on their professional jdugments, while not, and intentionally ignoring, and not applying the conflicting evidnace provided to prove how defendants professional judmgents was not only falsfied, but based on substantial departures from standard sex offender treatment reguatlions. This was because courts failed to infer, construe, all facts in light of and in favor of plaintiff, as being the non moving party, in summary jdugment. Rather courts construed and applied facts in favor of the defendants, by relying on their professional jdugment, ignoring the departures, and falsfied docuemtantions, as plaintiff provided to the court, by never speaking to those parts, and rather only idnicating and relying on the assertions

and professional judmgents, and insfuicent conclusionary labels, of them, essstailly construing, and applying facts in favor of the moving parties, in summary jdugment, the defendants and not, as legal standards require, to rather favor the plaintiff, whom was the non moving party.

In addition, courts ignored the fact that plaintiff is a pro-se litigant, and whom does not have to respond to defendants summary jdugment at all, and any/all inadsquatices, or non responding to material facts, shall not be used agianst the plaintiff, as being to grant defendants summary jdugment in favor of defendants.

Courts also failed to take it upon themselves to ensure plaintiff had a expert witness, and or counsel to assist him in this litigation. While courts have boasted about the lack of avaibility of willingness of counsel. Thats irrelvnat, to the matters the Plaintiff presented, that such matters invovle challanging defendants professional jdugments, as plaintiff being a lay person. Subsequentally, courts are under obligation to locate counsel, expert witnesses for favoring the plaintiff, at least come time in summary jdugment stage. Leaving plaintiff to his own devices, to challange defendants professisonal jdugments, and courts relying on them, when plaintiff clearly pointed to their falsfied documeninations, and substantial departures, then put the plaintiff at a substantial disavantage, allowing defendants to prevail, in violation of: Bracy V. Grandin, Jackson V. County of McLean.

Courts also adamantly denied plaintiffs ability to contemporaniously invoke criminal charges, agiasnt defendants, claiming a falsfied ruling, that they dont have jurisdiction, such belongs with criminal enforcemnt agiencies. However the reasoning why that ruleing by courts is false, baucase plaintiff is entitled to recover on criminal conduct by defendants, under Title 28 U.S.C. Section 1343, 1357, 1367,. By Defendants commiting conduct, while excersising professional condcut, that was infct 2 or more persons engaging in condcut, (use of professional jdugment) in which did infact corrlate to deperivations of such constutional, and statutory rights of plaintiff, in spite of courts findings they did not. Courts seemed to intentionally and deleirbatly rule in favor of defendants, so they wouldent be found in violation of such criminal vicaltions in that regard under Title 18 U.S.C.A. Section 241. 720 ILCS 5/33-3, 720 ILCS 5/12-21. Such rulings by courts, to deleirbatly and intentionally avoid findings of liaability agiasnt defendants, infact is what creates bias, prejudice, judical misconduct, error in manafest, hence requiring reversing, and remanding by this Supreme Court.

REASONINGS FOR GRANTING THE WRIT

This case invovles long standing precidential decisions cited herein, that invovles, and requires more than just some treatment to be issued to a sex offender (Plaintiff) recieveing treatment in a civil committment setting. Such issues, include, but are no way limited to, the constutional rights under 14th amendment due process that infact requires 'adequate' treatment to be issued, in manners that afford persons under civil committment or confinment standards adequate treamtent in which affords that person meaningful oppurnuities to then subsequentally be released.

The importance of this case, is because Defendants, and clinical treatment providers, at this Rushville Facility, for countless years, (to plaintiff belief, ever since its existance) has sucassfully circumvented such laws, and legal standards, and most importantly obligations to comply with limitations of standardized sex offendere treatment guidelines, reguatlions, hiding behind usages, and labels of 'professional judmgent and discression'. As explained herein, courts and such professionals are under legal obligation mostly by Precidental decisions/controlling case law, like: Daubert V. Merrell Dow Pharmacuticals Inc 509 U.S. 579 (1933); Brown V. Burlington; Youngberg V. Romeo that obligate, and require such clinical professionals issuing such treatment, to be done in manners that are in compliance with standard sex offender treatment reguatlions, and guidelines (i.e. not to issue it, by substantial departures of such reguatlions) that the Defendants, and Rushville Clinical Treatment team are repetivally adamant about not complying with, but moreso, substantially departing from such standards, calling it their right to do so, becuase of professional judmgents, and indivudalized treatment issuings to the plaintiff/and persons confined at such facility.

The other very searous and important issue, is that Defendants, and Clincial Treatment team at this Rushville Facility have hiddan behind, and largly been able to avoid legal lieability by claming their professional judmgents, and by treatment issuings, of courts allowance for such 'excuses' to recur, by not allowing plaintiffs to prevail that SUCH TREATMENT ISSUINGS THAT SUBSTANTIALLY DEPARTS FROM SEX OFFFENDER TREATMENT STANDARDS LARGLY ENDANGER THE COMMINITY, WHICH THEY RATHER BRAG ABOUT THEY ARE TRING TO PROTECT. Speffically, in examples already explaiend, that, most residnets have been released on the programs conditional release program, but have ultimatlly violated rules, or offended again, winding back up in prision, or back at this program. Defendants, and state call this 'residnets choice' rather is beucase of Dafendants, and largly The Rushville Facilitys inadequate treatmant methods, in which largly substantially depart from standards required of providing treatment to such sex offenders. This is by some examples (*but is no way limtied to) that treeatment issuings are soly unregulated, and documentnation left to the interpretations and judmgents of such so called professionals, without litmus tests of complience of standard regualtions, or factual evidnace. For example, as plaintiff explaiend herein, there is no audio/visual recordings of such treatment groups, leaving such documentnations of residnets invovlement, subject to discression, and judgment of the so called professionals. As explained, this than allows such so called professionals to only place conclusionary labels against or in favor of the residnet, in which then conceal or cover up any truthfulness of opposing facts and circumtsances. For example making conclusionary labels like 'refuses to take responsibility for his behaviors, or sex offenses'. Such label then is allowed to be placed, avoiding the turthfulness of 'what' spafic beahviors are in question. As the Plaintiff has explaiend, and personally been subject to, only untruthful hearsay by malicious group members that intentionally 'have it in for the plaintiff' as explained earlier, which, by such so called treatment profesisonals/defendants largly 'entertaining' such accusations, by their treatment reguatlions and requirments of 'behavioral managment' requiring before one progresses in the phases of the program (which as explaiend is a substantial departure initself, becuase of as explaiend, by

standrd methods, identify that behavioral managment is not approrpatie, and not a critera to determine ones progress, or lack there of in treatment, and infact is identifed as 'not sufficent to make long term changes amongst clients') which by such professionals/defendants being given premission (essetially by plaintiffs never being premitted to prevail agiast them) to use/excersise broad jdugment, in light of much evidnace proving how their judgments substantially departs from standard treatment) they have been continusally allowed, and premiteed to then entertain such 'high school like antics' amongst groups members, which infact only perpetuate ones risk to reoffend, which ironcially is why reisdents get out on c.r. and violate rules, beucase of such so called treatment professionals having entertained and allowed such residnets to gain power and control issues of such vulneerable persons in group. For example as plaintiff explained, such group memebrs, like Perroquet, Hollingsworth, and Vernon being premitted to sabatoge plaintiffs progression in treatment, and group work presentations, with false accusations of sexually acting out, and damaging state property, simply becuase of a 'hidden alterior, malicious agenda' to cover up their 'sex ring' antics, and methods to 'remove plaintiff from the living unit, so such others could, without plaintiff giving rise to such persons exploiting eachother. Also to remove plaintiff from such groups, so they wouldlent be challanged, or brought up of their offending behaviors by this plpaintiff. As explaiend, such rentless accusations, being premitted, becuase defendants/treatment professionals at Rushville Facility are so focused on obtaining anything to use agianst persons, they infact perpetuate offense behaviors, in this regard of Resident Bice being premitted to 'sats by' with his offending victimizing behaviors to another residnet was 'just a mistake' as beucase of blaming plaintiff so much of such false behaviors, that defendants continusally entertain without investigation, when they are not even to be allowing 'behavior manargent' to be part of ones treatment progress, nor to make treatment recommendations based on such behaviors. However plaintiffs treatment for years, has only been prefaced on this, becuase of allowing residnet group members to bring in, and rentlessly tormunt him with accsuations, of behaviors, whether true or falss, which infact derails plaintiffs abilities to focus on his offending behaviors, which than does not afford plaintiff abilities to focus on 'the things that brought him to this facility' rather focusing on such behaviors that usually are in this exaplained

Such so called treatment professionals, for years, have sucessfuly circumvented liesbility in such regards, and continsually being allowed to use discression, and professional jdugment, being 'unchecked' for credibility, making conclusionary labels, like 'fails to take responsibiloity for his actions, offending behaviors', simply by such professionals conclusionary writings in such group sessions. Such is why, in some other legal proceedings, have requyired audio/visual recordings, so such 'false interpretations cannot be allowed. Such allowances of unregualted standards, courts allowing the Rushville Facility clicnal team/defendants to run amock with their judmgents, has caused problems in this regard, by then the state, and evualtiors relying on such so called professionals docuemnts and conclusions to say one progressed, or compleated treatment to their standards. But no one has ever questioned 'if their standards were correct' in such findings, becuase largly they instil to residnets that 'just do whatever he needs to do, to get out and be free' without emphizing non offending lifestyles. For example, requiring residnets/plaintiffs to disclose things (i.e. unreported offenses, or sexual behaviors) that occured after

ones predicate offense (offense leading to ones confinment) under the 'intimidation' (beucase of usages of their authroity/judmgents, if residents dont comply, will not progress in treamtent as not allowed by the professionals at such facility, unless a resident agress to 'do it their way') which reguatlions indicate that to withold such disclosures, (as explaiend and quoted herein) and as well as by constutional rights, to be free from and protected agianst self incrimination. which such so called professionals require such rights to be given up, if not, with intimidations and threats of withoilding ones progressions in treamtent. Ironically, then 'sign off' on residents compleations in treatment, denoting that they 'have followed/complied with all rules of the facility, meeting behavioral expectations. Which is a lie, and falsefied records, becuase infact the resident didnt comply with 'all rules' beucase he had to violate the ones requiring witholding of such disclosures, in order to 'do whatever he needs to get out'. defendants/rushville treatment professionals 'signing off on' as one meeting behavioral managment, is then clearly a lie, and falsfied but no one challanges this, becuase the residents are aware that if they do, they will be witheld in treatments progressions, unless they agree to 'do it their way' which is in vioaltion. Ironcially, this is a 'barrier' to treatment, as labled 'casing' or 'telling one what they want to hear just to please them'. But ironcially the treatment providers 'ignore' these barriers that identify ones high risk to offending, to essetially be able to impose treatment as 'they deem necessary' which 'largly departs from such standards, and regautlions, intimidating the resident, with 'if he dosent want to do it their way, he can just stay here for the rest of their life'. Ultimatlly most residnets 'give in' because 'they want to get out' and can careless of recieving treatment in which makes them better, to not reoffend, realizing if they dont 'give in' they will ultimatlly stay here for the rest of their life. The only other alternative, is to allow the such so called treatment providers to have it their way, sign off on their treatment with the resident ignoring it was done in a multitude of violations of rights, and standards for sex offender treatemt, and infact identifed as by methods that are not sufficent to invoke long term changes among clients. Instead of 'staying here for the rest of ones life' usually a residnet then dacides to 'ignore these methods that only makes a resident worse, and allow them to do it their way, in vioaltion, beucase of 'wanting to do anything to get out' and 'screw reducing his risk to reoffend' but wants 'to make it appear that the professionals claimed he is a lower risk, when as explained, he really isnt. agian, beucase his treatment progressions was largly falsfied, signed off on, by such professionals ignoring the methods in which the resident compleid with, was only making them worse, identifed as by standards of treatment to not produce long term changes among clients. Another one, being that the treatment objectives checklist, indicates that asignments are required to be signed off on as the client compleates them, rather clients allow this to be violated, to just do anything to get out, even if thats complying with their instructions that largly make him worse, beucase as one can find, such assignments are rather signed off on all at once, by the treatment team, in violation of even their own reguatlions.

Point being, most residents, at such facility allow staff, and treatment professionals 'to have it their way' becusae of being intimidated into keeping them there for their life, if they give rise to such faulty and non compleint treatment issuings. This process, then largly identifes a residnet

having compleated treamtent to the satafication of the treatment professionals, as relied on by the state attorney as such, releaseing a resident on conditional release. Then a resident whom was so used to ignoring rules, and simply doing as he is told, gets on c.r. and winds up violating it, becuase of compleate disregard to rules, under the impression for years, that has been istilled in him, he dosnet have to comply, as long as authroity figures allow that to be violated. Under this guise, then the resident is befuddled on why c.r. agents violate him, and bring him right back to the facility, agian, its often blamed as the 'residnets choice' but infact was becuase of the dynamic, at large at this rushville facility, by not just the treatment team, entertains, and nurtures, compleince only with what staff want, and mostly is in violation of rules, which is never documented beucase staff are satasfied with and settle for 'ones compliience' and can careless about rules. subsequentally instilling in residnets, 'rules are pointless if authority premits them to be violated'. such is not only the plaintiffs baleifs, but as proof shows, in systemic evidnace.

Such methods, largly, is with deleirbrate and malicious intent to justify the facilitys existance, blaming the resindet, of his behaviors, boasting such to society, of the residnets choices, when such has nothing to with that, rather becuase of such oeprational, systemic non compliience on staff, and treatment professionals part in such explaiend methods.

Most of the time, when resdients litigate such issues, they are inticed into settling such suits, with then the professionals 'fast tracking' them through treatment, and being released. Which agian, creates such exact same endangerment dynamics to the sociiety/community, that the professionals and staff at the rushville facility once agian skated by with legal liebaility, signing off a false documentation of one supposeably doing what he needed to do to compleate treatment, becuase of one being inticed for 20 years, of encarceration, to just let them have it, so he can get out, and be free. Again, ultimatly the resident gets out, and is a high risk to reoffend, but such is documtned, for reasonings explaiend, otherwise. Such isnt 'treatment' if the resident was documtned as a low risk to reoffend, by such profesisonals, and state evualtions and attorney general, but no investigation went into any conflicting facts of such professionals judgments, as explained herein,

Because of the state attorney general inticing residnets to accept settlings of such litigations, by such methods, esseitally the problems spoken of herein, only continues, and gets worse, and perpetuates itself which is why such litigations from this Rushville Facility continue, becuase they avoided liaability for one indivual, but still invoke the systemic problems, to the rest of the facili.tys operations, and agianst residnets, ultimatlly prevoking more and more litigations, of the same matters, and or then subejcting all other indivudal residneets at the facility to such problems, just becuase that one person/resident was able to prove the such issues and settle the ligiation, but untimatly, settling it, still allows such professionals/defendants/rushville facility to invoke the same systemic problems to all other residnets, thus the problems continue to manifist itself, in either more litigations, or that resident being given treatment issuings, that fail to make them 'better' 'reducing risk to reoffend', documentations refelct as they have improved, but only because of such 'concealed' unprfoessional and

illegal methods employed, i.e. such refelctions in docuemtnations are only beeing taken 'on its face' without ever challanging if such decision, and recommendation by such professionals was done by complience to such standards, or by, as done, methods that largly depart from accepted standards, and infact are idnetifed as 'not sufficent for producing long term changes among clients'.

In this litigation, as plaintiff explained herein, the lower courts have continued this illegal and constutionally offensive process, by falsfiying records of proceedings, by misquoting the plaintiffs filings, having favored the defendants, in summary judugent, failing to apply, refelct, and credit plaintiffs evidnace that he filed to the court, as well as provided in discovery, that shows defendants and rushville clincial teams treamtent infact is falsfied, lied on the plaintiff, and largly substantially departs from standard sex offender treatment regualtions, hiding behind their usages of professional jdugments, in which courts are under legal obligations to compare, and contrast their usages of professional judgements to standard sex offender treatment reguatlions. Lower courts failed to comply with these legal standards, and rather relied on the Rushville facility/Defendants usages of professional jdugments, without ever identifying the facts of how its illegal, constutionally offensive, and substantial departures from standard sex offender treatment reguatlions. Lower courts, while ruling in favor of defendants, in summary judgment, infact failed to comply with even their own legal standards cited, as claimed they applied, but obviously didnt, in areas like, they are required to favor and consture facts in light most favorable to the non moving party, which in this litigation would infact be the plaintiff. The lower courts rather construed facts in favor of the moving party in summary judgment, the Defendnats, by consruing facts, evidnace, and their professional judgments, and docuemtnations in their favor. Court only, in their summary judgment order, relied on 'chery picked' portions of defendants docuemtnations to identify blame and no merit on plaintiffs claims, instead of applying mounds of conflicting docuemtnations and evidnace, plaintiff provided, that shows how that intial docuemtnation, by defendants, was false, and a lie, and not based on standard sex offendar treatment reguatlions, rather their professional judmgents in which largly departed from standards of sex offender treatment guidalines, and reguatlions.

Lower courts also erroniously dismissed, and failed to allow plaintiff to entertain and recover on proof of many constutional vioaltions, by Defendants treatment issuings, as opposed to the one claim courts allowed under 14th amendment procedureal due process. Speffically, as plaintiff explaiend herein, plaintiff provided to court, docuemnts provided to him, in discovery (e-mails) that proved the plaintiff has, and shall recover also on first amendment harassment and retalaition claims for his greivance activity, by defendant omiting that plaintiff will continued to be held up in treatment, untill he ceases his grievance activity. Plaintiff also showed through docuemts provided to the court, that defendants treatment program largly is in conflict with standand sex offender treamtent regulations, and constutional rights, speffically requiring self incrimination, in order to progress in the treament program. In spite of written treatment work claiming they dont and advise of such things to be witheld, agian, their treatment as omited in e-mails, conflicts, requiring disclosures of self incrimination, vioaltions of 5th amendment, and if a client refuses to give up those rights, (i.e. intimidating him to give them up) (i.e.

criminal violaltions, ontop of such constutional violations under Title 18 U.S.C.A. Section 241) he is essetially threatned under professionals authroicty and judngants usages, to not progress him in treatment, till he gives up these rights, and 'can stay at this facility for life'.

Lower courts lied and falsfied the record, and their rulings, by claiming, in their summary judngant order, of things plaintiff never said, nor quoted, for example, claiming plaintff supposebaly cited title 20 section 1905.90 which courts claimed dosent spefiey anythign of how professionals are required to issue treatment. Plaintiff ifnact pointed out to appellate court, which they delierbatly ignored, continuing illegal conduct prejudice, bias, judical miscodnout, error in manafest, by not identifying the fact that plaintiff pointed out, in spefic summary jdugment responses, where he rather cited other parts of title 20 section 1905, where such does infact spaficy,a nd require how the defendants, and treatment professionals are reqwuired to issue trematment, in which they are substantially departing from. Courts simply ignored this, to favor the Defendnats.

Courts also claimed plaintiff stated, in their summary jdugment order that plaintiff cannot progreess in treamtent becuase facility rules prohibit plaintiff/residnets from having sex with eachother'. Plaintiff never claiemd this, nor even aluded to this, essstially falsfying and lieing on the record, further, by 'putting words in plaintfifs mouth'. Plaintiff rather explaiend, his issue is that facility will not allow pro-social skills, that they claim that they teach to residnets. This is becuase any time any residnet, like the plaintiff expresses sexual insterist in another, they are immediatlly seperated. This does not allow for relationships to devolp into a pro-social rehlam, which is not sexual, plaintiff never said that. Pro-social behavior, largly emtails and requires residents to lear how to express healthy sexual interactions. The Plaintiff, being homosexual, has identifed many issues with inabilities to socalize with persons whom he is attracted to, in a non sexual way. Defendants, and the rushville facility fails to allow treatment issuings to teach plaintiff and others, how to engage in social interactions, in a non sexual, but healthy way, with persons they are sexually attacted to. This failure, by using 'avoidance' methods, which, aggian, is identifed by standard sex offender treamentn, as not sufficant to produce long term changes, nor to reduce risks to reoffend, these methods, is what infact perpetuates ones risk to reoffend, becuase one, like the plaintiff never learns social skills in how to be around others whom he is atracted to, sexually, in a pro social wanner, becuase he always 'avoids' boucase the facility discourages any persons from being around eachother whom are sexually atracted to eachother. Which for the plaintiff, is largly his offending issue, had predominataly exposed, or voyered, on others, becuase he failed to know how to engage in verbal, pro social skills with persons he was attracted to, i.e. in order to get sexual gratifyation, becuase plaintiff didnt know how to 'ask for it' or engage in a relationsnip, would engage in immediate gratifying offending behavior, agianst those whom he is attracted to. At such rushville facility, anytime plaintiff expresses sexual interists in a resident, other residnets become jelous, make up theoroies, like in plaintiffs stamtents, and facts in this litigation, then defendants or clical therapists/defendants seperate them, preventing them from being social, and witholding sexual interactions, essetially deprivaing plaintiff from learning prosocial skills with

persons he finds atttractive, in a non sexual manner to work on plaintiffs 'issues of offending, of how to interact with others whom he is sexually attracted to, but not act on those urges'. The facility and clical team has rather indicated to try to teach plpaintiff skills with persons he is not attracted to, under the pretense, and justifications that such skills will manafest itself to sexual persons he is attracted to too. However, plaintiffs offending history shows, that he dosent have issues with engaging in social situations with persons he is not attracted to, rather only those whom he is attracted to, so the defendants treatment in this regard is not relevant, and infact alterior methods only does nothing to reduce plaintiffs risk to reoffend, becuase he has the distorted belief that he has no obligations to persons he is not attracted to, and can treat them any way, including abusive, rather persons he is atttrracted to, will throw himself at their mercy, leading to plaintiffs abuses by not decifering of when to engage or disengage, for a lack of better words becomes blinded by false delusions of love. Defendants treatment issuings, tring to teach plaintiff pro-social skills from and to persons he is not attracted to, then is irrelvant, his 'issues' are only isolated to persons he is attrracted to.

Defendants, Rushville Facility Treatment Staff, Courts, have premitted antiquated moot legal standards, of 'some' treatemnt to be issued to residnets/clients at rushville facility, without legal standards as required under 14th amendment, adequate treatment, posing meaningful oppurnuities to be released. This can only then come in the forms of 'sex offender spefic treatment' 'core/disclosure/post disclosure groups' and not soly mental health groups. As for reasonings explained, evualtions of residnets/clients risk factors, state attorney general, courts, will not allow, nor identify a clients/residnets risk to be identifed as reduced, if he only has participated in mental health groups. Thus Defendants placemnt of Plaitiff, and other rushville residnets only in mental health groups, i.e. ancelory groups, power to chagne, claiming such assits with sex offender treatment, and only is required to provide 'some' treatment, then is constutionally offensive, baucase any time a client/plaintiff is only placed in these other mental health groups, and absent placment of in sex offender spefic groups, i.e. disclosure, post disclosure, (claimign they dont have space, avaiblity) then is clear that such program and treatment issuings are infact constutionally offensive, as does not provide adequate meaningful treamtent for one to be released, beucase in order for that to occur, has to engage in sex offender treatment spefic groups, i.e. disclosure, post disclosure, to be considered for releeasse. Thus making it facutal that only placement, at any time, only in mental health groups, becuase of space, availbility, means then the program not just defendants, largly, cannot provide 'adequate' constutionally protected treatment to afford one his release, becuase he essetially has to 'wait' for 'avaibility' into sex offender treatment groups, and or, as plaintiff is subjected to, placement soly in mental health groups, blamed, falsly of his behaviors, as a guise, under defendants false claims of their professional jdugments issuings, simply beucase plaintiff has been deemed as 'disruptive' in groups, without denoting the truthfulness, becuase he 'calls out others B***S**t, also becuase defendants dont want someone like plaintiff in groups whom challanges their treatment issuings, for correctness, rather want someone in treatment that will just do whtat they need, to get out, including as plaintiff explained, casing, or telling them what they want to hear, ignroing all vioaltions, including methods that only make a client

worse, but only because of brainwashing a client, to do what he needs to do to get out, without realizing 'what he is doing is infact identifed as not sufficant for the client to produce long term changes, but the defendants documentnats reflect it is, which is why their refelcitions and judgments are false, lie, and only to 'make it look good for them, and the state'.

For reasonings stated herein, untill courts require systemic changes agianst Rushville Clinical Professional Treatment, and not mere corrections behind closed doors, or settling of one particular indivudals suit/litigation, which courts have obligation to do, to ensure cessation of such constutional issues, in cases cited herein, and simply cannot rely on them making changes, behind closed doors, baucase such dosent ensure pennant and ongoing systemic changes, such allows, at any given point, for such issues to recurr, till written, court orders, via plaintiffs prevailing agianst such defendants is allowed.

Additionally, agian, regardless of individual corrections to the 'plaintiff' 'behind closed doors' is irreavlant, because this litigation identifes facts proving of a larger systemic issue, that defendants treatment under non regulated issuings and allowances of defendants, and Rushville Clinical Teams Professional Judmgents, (i.e. without factual, unbias records, like visual/audio recordings of such group sessions, to alieavte such incorrect conclusive lablings, absent supporting facts, including defendants misuages of authroity and judgents) infact not only creates the multitude of constutional, statutory, criminal vioaltions, and as well as substantially departs from standard sex offendder treatment reguatlions, and not only, by courts allowing of defendants to prevail, vioaltes, and fails to comply with all such mationel, controlling, precidental case laws, and legal standards, and constutional rights, but infact endangers society, and civilians, because of such incorrrect treatment issuings, under the guise of one reduced his risk to reoffend, because of usages, and signing off on, by professionals treambent was complied with, but not indicating if such issuings were made in correctness and compliance.
Rahter such treatment issuings, and professionals judgments, and compleations, for reasonings explained herein, but in no way limtied to, are not just an issue of substantial departures from sex offender treatment reguatlions, but is endangering society, baucase of predominatly invoking and brainwashing clients to beleive and comply with methods by them, and their issuings, that mostly identify as not sufficant to produce long term changes among clients, which, is no wonder why clients get out on conditional release, and vioalte it, and or offend agian, not as blamed baucase of the clients choice, rather because of the defendants treatment issuings were premitted to be identifed as sufficent, when further scurtny into such facts, plaintiff is giving rise to, is only making clients recidivism risk worse.

Based on these facts, this Court shall also be aware of the other underlying issues in this matter, specfically, as the court will find in the attached appendix "E" that this Plaintiff has been through such issues before, at a prior treatment facility called "Omega Academy" in which the court will see similar issues presenting. That being that of the so called treatment professionals 'claming/boasting' about doing everything they could, and labling the Plaintiff as 'successfully completing treatment'. This was stipulated in their 'discharged summary' report. However, as attached hereto, in appendix "F"

which is a formal letter from such treatment providers, that indicates and refelcts the Plaintiff and his family, spaffically his mother made many attempts to communciate concerns of sexual relapse to such treatment providers, as claimed, in their 'discharge summary' that they would provide adequate aftercare. However as clearly refelcts, they basically 'ignored' such pleas, and infact, as reflectant on their discharge summary, continsually 'blamed' the Plaintiff for and pushing responsibility onto 'his choices'. Once agian, this dynamic that is simualrly exhibited here, in this litigation, continues, that of the irony that the so called treatment professionals brag about provideing adequate sex offender treatment, and such methods are 'so effective at treating' one to prevent any relapse, ironically when 'push comes to shove' such treatment providers push blame and responsibility onto the client, as if such is 'his personal choices'. But is conflicting with such profesisonals finidings that their sex offender treatment supposeably is 'so adequate' and 'prevents recidivisim if the client complies'. However such shows that basically sex offense treatment is basically not as represented to the public to be, that rather is 'throwing information at the client, then blaming him for his choices to do it, and not reoffend or offend. Such representations then are false of sex offender treatment, that of such 'professionals' supposeably doing 'everything to give adequate treatment'. Just as in this litigation. The other factor is that THE "ONARGA ACADEMY" FALSFIED DOCUEMINATIONS TOO, JUST LIKE IN THIS LITIATION BY DEFENDNATS, CLAIMING OF TREATMENT PROGRESS AND COMPLEATION, (i.e. their discharge summary') BUT AS LATER FACTS SHOWS, (in the attached appendix "F") THAT BECUASE OF LEGAL, AND POLICICAL ISSUES (i.e. plaintiffs probation expering) HE WAS "FASTRACKED" THROUGH TREATMENT, LABLING HIM, BY PROFESSIONAL JUDGMENTS, THAT HE SUPPSOEABLY COMPLEATED TREATMENT, BUT CLEARLY DIDNT. Infact "Onarga Academy" blamed that if Plaintiff continues to engage in such behaviors, then recommendations would be, ultimatly recommending plaintiffs enceracaration to protect community at large. THIS ALSO PROVES THE UNDERLYING MOTIVE, FOR THIS LITGATION, AS PLAINTIFF BELIEVES, SPEFFICALLY THAT SUCH ISSUES PRESENTED HEREIN, SEEMS TO BE DELIERBATE AND INTENTIONAL TO SABATOGE THE PLAINTIFFS TREATMENT PROGRESS, BUT MAKE IT APPEAR AS IF ITS HIS FAULT, BY BEHAVIORS, AND LACK OF RESPONSIBILITY ETC, HOWEVER THIS DOCUEMNT PROVES THAT OF SUCH APPEARED UNDERLYING INTENT, TO KEEP THE PLAINTIFF CONFINED INDEFINATLY DUE TO HIS REPETIVE OFFENDING. HOWEVER IF THAT IS THE FACTS, THEN SUCH IS MORE REASONINGS TO GRANT THIS WRIT, SIMPLY BECUASE, THE SEXUALLY VIOLENT PERSONS LAWS, AND COMMITMENT, UNDER 14TH AMENDMENT CONSTUTIONAL RIGHTS, STIPUALTED HEEREIN, ***MUST BE BASED ON ADEQUATE TREATMENT TO AFFORD CLIENTS MEANINGFUL OPPURNUITIES TO IMPROVE ENOUGH TO BE RELEASED****. Point being, if not yet already obvious, that the laws, and legal standards that are authorized to detain/commit this Plaintiff at this Rushville Facility, is only under the pramsis that if he has meaningful oppurnuity to recieve adequate treatment, and subsequentally be releassed, that being, if the underlying intent by the States Attorney General is to keep plantiff permantlally confined, regardless, but make it appear as if the reasonings why he is confined is simply due to his behaviors, and hightned reoffense risk, by such docuemtnations by facility Staff and Defendants/Treatment Professionals, then CLEARLY THAT SPEEKS TO THEIR MALICIOUS AND UNDERLYING INTENT IS TO CONTINUSALLY PLACE PLAINTIFF IN SUCH SPOKEN OF "ENTRAPPING" SITUATIONS IN HIS TREATMENT, AND DAILY LIFE AT SUCH FACILITY VIOALTING SUCH LEGAL, CONSTUTIONAL RIGHTS, IN ORDER TO MAKE IT APPEAR ITS THE PLAINTIFFS FAULT, AS TO WHY HE CANT PROGRESS, AND BE RELEEASSED, BUT

CONSIDERING THESE FACTS, RATHER IS SUBSTANTIAL EVIDANCE TO ALUDE TO THE PLAINTIFFS APPEARING FARFETCHED CONCLUSIONS ARE INFACT ACCURATE, that being such conflicting, non compliant treatment methods to standard sex offender treamtent, by the Defendnats/ Rushville Treatment providers, are infact to deleriabtly and intentionally place plaintiff in entrapping situations, to then cherry pick his behaviors, actions, codncut, absent lack of compleince, and unprofessional, and illegal condcut on the Rushville, and Defendants/Clinical treamtent providers part, to then provide documentation to the State Attorney, that of the need to permantlly place plaintiff in confinment, meeting the underlying motive, to use authroity to permantally dentain plaintiff making it appear as if its his behaviors, of why he cant be released when infact its Defendants/Clincial Treatment Providers, and Rushville Staffs deliebrate and intentional lies, falsfications of records, including treatment records, (by methods described herein this writ) that is at such cause, of why plaintiff cannot progress, and cannot recieve adequate treatment.

THUS BEUCASE THE LAWS IN WHICH GOVERN THE PLAINTIFFS CONFINMENT, AND OR COMMITMMENT MUST AFFORD PLAINTIFF MEANINGFUL OPPURNUITY TO BE RELEASED, IF THERES CLEAR AND DELIEBRATE INTENT TO "SET UP" THE PLAINTIFF, AS EVIDANCE ADDUCTED THUS FAR SUGGESTS, TO PERMANTALLY KEEP HIM CONFINED, THEN CLEARLY HIS CONFINMENT BY THE SEXUALLY VIOLENT PERSONS COMMITTMENT PETITION IS INFACT ILLEGAL AND CONSTUTIONALLY OFFENSIVE, BEUCASE ITS NOT AS PROVIDED TO PROVIDE IREATMENT TO BE RELEASED, BUT UNDER THAT GUISE, TO PERMANTLLY CONFINE THE PLAINTIFF, VIOLATING DOZENS OF CONSTUTIONAL AND LEGAL RIGHTS AND THE SEXUALLY VIOLENT PERSONS COMMITMENT ACT IN ITSELF.

CONCLUSION

For the Searousness of these issues presented herein this writ, the countless clear, deleirbate vioaltions of constutional, legal/statutory rights b y the Defendants/Rushville Clincial Treatment team, Rushville Facility Staff, including the State of Illinois Attorney General having participated in such and being the cause of such illegal, and constutionally offensive acts, under the guise of their legal authroity, and professional judgment, this Supreme Court Shall Grant This Petition, including but not limited to its remedies, involving up to, and including the State of Illinois Attorney General, and the Court of Cook County in which the Plaintiffs civil commitment is derived from.