

No. 20-8436

Supreme Court, U.S.
FILED

FEB 08 2021

OFFICE OF THE CLERK

IN THE
SUPREME COURT OF THE UNITED STATES

Michael T. Hughes — PETITIONER
(Your Name)

vs.

Kim Andersson — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

7th United States Court of Appeals for the 7th Circuit
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Michael Hughes
(Your Name)

2700 South California Ave
(Address)

Chicago Ill, 60608
(City, State, Zip Code)

815-708-0259
(Phone Number)

ORIGINAL

Rule 14.1(a) Question Presented For Review

1. Now comes Appellant in this Certiorari to request these High Tribunals to determine whether The Northern District of Illinois over asserted its authority in: First, Dismissing Plaintiff / Appellant's civil actions with "Prejudice", from illegally ascertained evidence that violated Appellants constitutional rights to obtaining second, using that same information to further "enjoin" Plaintiff / Appellant from filing any further actions until he has paid off all of his outstanding fees thus creating a form of tax on an Indigent Detainees ability to hold these accountable for the injurious sustained and that are continual to this day. It must also be noted that the Executive Committee "Enjoined" the Plaintiff without a hearing or opportunity to be heard, with the protections of due process.
2. To decide whether a District may take 20% of a detainees trust fund compounding with a max of 100% of a litigants trust fund or only 20% as the PLRA proscribes.
3. Did the Plaintiff commit fraud by asking his brother only one time to pay a \$34.00 Inmate -to- Inmate loan of Hygiene and legal supplies

LIST OF PARTIES

[] All parties appear in the caption of the case on the cover page.

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

~~Michael T. Hughes V. Kim Anderson~~
The Executive Committee V. Michael T. Hughes
Northern District of The Eastern
Division

RELATED CASES

1. Michael T. Hughes V. Cook County Department of Corrections
2. Michael T. Hughes V Cook County: motion to Dismiss
3. Executive Committee Order "In Re Michael T. Hughes"
Civil Action no. 20C4102
4. Michael T. Hughes V Kim Anderson, no. 18CG139 7th Circuit
Order

TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

STATUTES AND RULES

OTHER

TABLE OF CONTENTS

OPINIONS BELOW	1
JURISDICTION.....	
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	
STATEMENT OF THE CASE	
REASONS FOR GRANTING THE WRIT	
CONCLUSION.....	

INDEX TO APPENDICES

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F

IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

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

OPINIONS BELOW

☒ For cases from **federal courts**:

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

☐ reported at _____; or,

☐ has been designated for publication but is not yet reported; or,

☒ is unpublished.

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

☐ reported at _____; or,

☐ has been designated for publication but is not yet reported; or,

☒ is unpublished.

☐ For cases from **state courts**:

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

☐ reported at _____; or,

☐ has been designated for publication but is not yet reported; or,

☐ is unpublished.

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

☐ reported at _____; or,

☐ has been designated for publication but is not yet reported; or,

☐ is unpublished.

JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was November 19, 2020

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

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

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

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

☐ For cases from **state courts**:

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

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

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

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Now comes, Michael T. Hughes, Appellant in this supra action authorized by law indoctrinated in Supreme Court Rule 18; for an Appellant to appeal directly to The Highest Court of The United States of America. The Appellant appeals an unique Order from the Executive Committee of the Northern District of Illinois, to the Commissioners of Justice, to answer a question of national precedence and Federal importance, thus appropriately proscribing the usurious intention of Judicial pejorative by this District Courthouse in Chicago, Illinois. The question as presented to these High Courts, is of such relevance to the legitimacy of the continued Rights of the detained and incarcerated to have any "Meaningful access to the Courts" and with the reach of the "Jus Commune" that it extends out into the realm of "Judicia Publica" of our societal interest. It may only rest within the auspice of The Supreme Court to settle this "Quaestiones Perpetuae". On July 15, 2020; The Executive Committee at the single request of the Honorable Virginia M. Kendall, issued an Executive Committee Order - signed by the Chief Judge of the Eastern Division (Exhibit A), that forever enjoins Appellant's ability to bring new litigation for injuries that may or may not come at the result of his detainers C/DOL. The Order specifies his bringing actions as a Pre-se detainee Plaintiff under the PLRA "In Forma Pauperis" (I.F.P.) provision Title 28 U.S.C.S. section 1915(a)(1) - generating Legal document: "In Re Michael T. Hughes, Civil Action No. 20C4102"

containing "inter alia", an Order for potential "contempt of court" charges. The Executive Committee has not citationed from where it has derived its authority in any form, if that being: Congressional, Federal Statute, Judicial Committee Policy, Supreme Court caselaw precedence, nor any other governmental binding body. The Appellant was not afforded the opportunity to be "Heard" or avert the consequences of enjoinderment, nor was he given any protections of Due Process, yet his Rights were arbitrarily divested of him, from a single suggestion, and with an opinion nor explanation backed by authoritative law of his faults. The Appellant has not acquired any Strikes for any of the following offenses against the Court process: Failure to state a claim; presenting a frivolous action or resubmittal of an action previously dismissed; initiating a suit in a maleficent or vexatious manner to harass the Judiciary or any institutions; The Appellant has moved for every action in "Good faith" and no sound nor circumstantial proof can be given of a "Mens rea" prior to filing any of the Plaintiff - Appellants' 17 cases. The Appellant filed 17 grievances against his detainer for 17 real injuries, one of which left him without his colon and subjected to wear a colostomy for life "Michael T. Hughes v. Kim Anderson" 1:18-CV-06139 (District Court Number); 20-1635 (Appellate Court Number)", all of which have met the rigid scrutiny of the following Statutes, as well as others not specifically cited: 28 U.S.C.S. section 1915A; 28 U.S.C.S. section 1915(A)(b)(1); 28 U.S.C.S. section 1915(e)(2)(B)(i);

28 U.S.C.S. section 1915(e)(2)(B)(ii); 28 U.S.C.S. 1915(b);
or as stated any other screening provision for dismissal and each
claim was found to have merit and standing to continue on to the
discovery litigation stage and demanded that CCDOC's subordinates -
Defendants, answer each and every accused damage through their
representations: Cook County State's Attorney's Office of Kim Foxx.
This injunction was done at the behest of a single District
Court Judge, to a procedurally and felicitous novel Pro-se
detainee, with his only provocation being an exceptional ability
to produce effective Court papers in the midst of his destitution
against an opprobrious institution (CCDOC). The Executive
Committee's revoking of appellant's I.F.P. status, due to his
ability, in a penny state, to have access to the Courts
is such a departure from "De Rigueur" it strikes the marrow
of balance in the Constitution; that a citizen can be
sanctioned into abnegation by no fault of his own is truly
disheartening. The Appellant is perplexed, because The House
of the Stewardship of the Bill of Rights - vested with the
protection of Law and Order, handed down such a heavy penalty
without the foundation of Due Process, which is the foundry that
our Constitution was laid, created a missed opportunity for
judicial economy and comity. The Honorable initially moved
"Sua Sponte" to dismiss Appellants meritorious causes of
actions for the slightest "Ignorantia Facti" when he mis-
interpreted an ambiguous question that a majority of layperson
applicants applying for I.F.P. status in supra District Court house

misrepresented by leaving blank. This was such a recurring issue that the entire form was changed in 2020 (Exhibit B).

The question in dispute was: Question 4.E that requests "Gifts" or "Inheritances" on a financial questionnaire page for the immediate 12 months. Appellant, as most applicants would leave the question blank or impute \$0.00. But, the Court expected applicant to calculate their last 12 month trust fund deposits from friends and family. The Appellant was admonished for allegedly not being honest on his I.F.P. application and was required to "Show Good Cause" as to why he failed to answer the question truthfully.

The Appellant immediately acknowledged this misinterpretation and made known that there is no one in place to aid in the creating of Court papers and immediately apologized for his misunderstanding.

The Law Librarian would help prepare Court Documents but they would at least calculate the last 12 months on your trust fund upon request. The Appellant asked for calculations from the Law Library on every I.F.P. application after his admonishment so not to error again. The new I.F.P. application specifically request a Question of: "Deposits by others into your jail or prison account" (No. 2: Line 7) (Exhibit B). The Law Librarian would calculate the deposits for requesting Applicants for 2 reasons: 1.) On the last page of the Northern District I.F.P. application, it requests a "Certificate" done by an "Authorized Officer", the Law Librarian is that "Authorized Officer", to give the average deposits for the last 6 months; so as a convenience the Law Librarian would give the 12 month totals

2.) There are 365 days in a year; CCDC allows a detainee to purchase commissary once a week for: \$100.00 in food, \$50.00 in hygiene, and \$50.00 in phone time; there are 52 weeks in a year and if a detainee is enabled to accumulate \$200.00 or less every week it is usually done through an aggregate of small to medium size deposits; on a trustfund there is little to distinguish deposits, from, purchases, from occasional refunds and without a calculator it is a perilous undertaking. With potentially hundreds of deposits and the risk for any error having your case dismissed due to accidental miscalculation (Exhibit 6) the Law Librarian calculations are essential to completing a proper complaint in indigence. So, a meritorious claim could be dismissed on the premise of arithmetic illiteracy and this stern approach has been taken by this Court in some of my cases. The Appellant trusted the Law Librarian's calculations and redid the I.F.P applications with the given numbers to cure the issue. The Court accepted the Appellant's totals from the Law Library and went on to attempt discovery for 2 arduous and painstakingly detailed years; filing motions in the Honorable's Court room (Exhibit I), which same that were never honored by the Defendants or sanctioned by the Honorable even though the Appellant moved several times for sanctions of the Defendants' continued violations of the Honorable's very own Orders and Federal Rules of Civil Procedure, moving same 10 times in 2 years. The Appellant moved for Title 28 U.S.C. § 1915 sanctions

for multiple delays but the Honorable did not once consider sanctioning the Defendants for over 20 plus unanswered discovery requests that spanned over the years. Consequently, for Appellant and many other CROAC detainees that requested help from CROAC's Law Library, all the 12 month balances on every action's I.F.P application were computed incorrectly. (Exhibit C). Exhibit C shows Appellant's and another detainee's "Certificate" page of the I.F.P. application done by a CROAC "Authorized officer" being imputed incorrectly with most having averages above the actual monthly balance, so as to appear as if more money was deposited than what the trust account truly holds. The Appellant deliberately and thoroughly pointed this out in a motion to the Honorable Virginia M. Kendall in the District Court, but the Honorable stayed her course in the dismissal, shifting the blame to Appellant for trusting the Law Library and not addressing the Law Libraries miscalculations (Exhibit G). The misrepresentation were so irrelevant that the Appellant would have still been eligible for I.F.P. status. The Appellant implored through motions and letters to save his litigation by explaining that the calculations came from the CROAC Law Librarian because Appellant did not have access to a calculator and requested on a "CROAC Request Slip" several times for the Law Librarian to add the hundreds of potential deposits, which she did. The Appellant was admonished already, why would he purposefully misrepresent his destitution if he is truly impoverished it would make absolutely zero sense to put in jeopardy a valuable claim for a misrepresentation of

the truth, he wouldn't have to risk lying when the truth would have been sufficient. The answer is evident, which is he would need help in his misrepresentation or sabotage of his I.F.P application by the subsidiary of CCDOC Law Library. Every claim was dismissed off this premise some almost 2 years later, it makes no sense that a Defendant would attack a minuscule early procedural error as a way to dismiss a claim unless it was purposefully target as an excuse to dismiss the Appellants causes of actions. Just a quick review of how the Appellant has been handled will show evidence of misconduct and prejudice. The Appellant did everything he could to save his claims, not one was dismissed on the merits, and now the District Court has enjoined Appellant without cause; The Seventh Circuit of Appeals has now joined in with its Chief Judge Honorable Diane Sykes to dwindle the Appellants actions to just one claim in the Appeal Court not yet decided Michael T. Hughes v. Kim Anderson; Federal case no.: 18-cv-06139; Appellate Court No.: 20-16357, but Appellant has reason to believe that, that claim is in jeopardy of being dismissed by what a Sgt. Stubenlake stated in a taunting and bragging tone to Appellant, "your Judge called Tom and said 'you aint got shit coming and you cant sue any more until you pay your debts'" "your Appeal is going

to be dismissed" in front of a sworn Deputy Neely and an entire 4-E Div's deck. The last claim in the Appeals Circuit is the most detrimental to CDOC. Appellant contracted a bacterium from the deplorable living conditions in CDOC; he was ignored until his colon burst; then he was still ignored until he had to strike an officer to get a supervisor to the tier; he endured 2 months in Stregos Hospital, chemotherapy, being fed intravenously, and pain so severe that he required an epidural, Morphine drip, Tylenol drip, oxycodon, and a host of other medications to subdue the pain; not to mention the 20 or more bloody septicus discharges that made the appellant go from 250 lbs solid muscle to just barely 90 lbs and months of therapy. The Courts are attempting to bury the Appellant, that is left with a colostomy for life because of this ordeal. The Appellant has 20 months of discovery, that he had to find other ways to get because CDOC ignored almost every request but he has grievances and medical slip from before he lost his colon to prove his claim. The dismissal appear to be less for discretionary procedural errors and more of a targeted act of "arbitrarism", to clear the Appellant from the Honorable's docket because he was a pro-se detained plaintiff and the attention and complexities required a

considerable amount of time from the Honorable.

The Honorable Virginia M. Randall even stated so in her opinion (Exhibit H) "Third, the court has spent significant amount of time reviewing Plaintiff's case" (Case No.: 19-CV-06469 Michael T. Hughes V. Cook County, pg 13) The Appellant is left with an ample amount of evidence to prove his claims but no forum to entertain or tell them to, as well as, copying fees in the thousands, court fees in the several thousands, and other expenses that will never be recouped all in the pursuit of Justice for his pain and suffering to be heard on the Steps leading to Adjudication. But the Doors of Remedy have been shut-up tight and no avenue to Justice remain to the Appellant. After years of assiduous learning the narrow esoteric pathways to the American Judiciary; navigating difficult channels of Procedure and Policy; reading every committee available from Freund, Aldersitt, Sansinich, and the Honorable Justice Blackburn; these were the intended causeways for every American to come to correct the injustices of society; so why am I not sojourned and my travel cut short. These once active ways to Justice have been drained; in the Port of Juris-Diplomacy is a siege and the new feudal system of local "Cravens" have, through a hired hand, bludgeoned the rightful victim into

Submission before the final Crow's Chime. This is not the rigid American System that the World has come to reverse since the creation of one of the oldest Constitutions known to man. Now, it seems that Justice is selective to the "Quantum Meruit" of not the injury or damage, but of "quid pro quo" at the expense of Societal interest and its well being, to benefit the private ventures of the aristocratic minority. When the, "U.S. Department of Justice, Civil Rights Division" conducted an investigation into the conditions of confinement at "Cook County Jail" (CCJ) or (CCDOC) on February 16, 2007 and other duties pursuant to the "Civil Rights of Institutionalized Persons Act" (CRIPA) Title 42 U.S.C. section 1997, which incorporated the co-operation of several hundred: experts, correctional consultants, detainee Accounts, CCDOC Cermak Healthcare Provider testimonies, Deputy eyewitness statement of abuses, countless depositions of Directors and more (Exhibit D). The laborious hours of the seemingly inexorable research and assessments by the Civil Prosecution Arm of the Department of Justice and U.S. Attorney General's Office, all which resulting in a compendious lawsuit being leveled against Cook County and subsidiaries as Defendants and The United States of America as Plaintiff. A letter and comprehensive report was sent to CCDOC, a 98 page document scolding the institution for its lascivious and salacious misconduct and disregard for humanity and preservation of life

through its mismanagement of the CCDOC compound and dangerous practices of maintaining, or lack thereof, a critically below recognized standards of corrections or constitutionally sound facility, that resulted in the proliferation of disease, abuses at every level, and a deliberate indifference to the Duty of Care owed to its detainees. The 98 page report was addressed to Cook County Board President Todd Stages and Cook County Department of Corrections "Jail" Sheriff Tom Dart; scathing in every aspect, of the criminal level of the disembodied state of living conditions at CCDOC; declaring in part,

"During our July 27, 2020 exit meeting and by letter dated August 3, 2020 (Appellant could not locate this letter), we notified CCJ officials of 'Life-threatening deficiencies in sanitation and safety measures at CCJ'" (98 page DOJ Letter - Report, hereinafter - "DOJ Letter" will be cited throughout this document by page where quote appears and will be attached in entirety as Addendum Exhibit D.) The lawsuit that trailed the letter indicted: Cook County, Illinois; Tom Dart, Cook County Sheriff; Toni Preckwinkle, Cook County Board President; Cook County Board of Commissioners; in the Northern District of Illinois, Eastern Division, Case No. 1:20-cv-00946; presiding the Honorable Judge Virginia McKendall. (Because of Cook County unique position in the political arena the powers of County is not completely vested in the Sheriff but commensurate among several different authorities but the Jail is Sheriff's Tom Dart responsibility but financial capabilities are vest in the Cook County Board President Toni Preckwinkle - "Madam Cook County".)

The legal ramifications entailed a consent decree with Cook County and Monitors being put in "locus in scire facias" to keep the Court involved in the progress. The Honorable endorsed an Order with the Honorable Judge Richard J. Posner of the 7th Circuit Appellate, deserving of encomium, and The Honorable Judge Sharon Johnson Coleman, a trailblazer of the "Judiciary" from the Bench, and The Honorable Judge Virginia McKendall, with her astute and precocious ability of the discernment of the Constitution a team of capable elites have been assembled. But over a 10 year span it seems that the good will faded and the Honorable Judge Virginia McKendall was left with the supervision of the Consent Decree, after a considerable amount of reading the Appellant is aware of the obstacles of a Consent Decree and the responsibility to structure it is left on the Honorable to designate a Master and pool resources without the rigid and order of what Judges might be used to in law, a long drawn out consent Decree can become taxing and exhausting being a new frontier with little guidance. Requiring the Honorable to become a Quasi-Expert in some respects, just to make sure the Decree is upheld and as well as stay unbiased to the claim could be extremely difficult [see e.g. *United States v. Allegheny-Ludlum Industries Inc.*, 63 F.R.D. 1 (N.D. Ala 1974), *aff'd*, 517 F.2d 826 (5th Cir. 1975) *Petition for cert. filed*, 99 U.S.L.W. 350 (U.S. Jan 15, 1976)] where the defendant were heavily required to create a Consent Decree against its self because the industry was so foreign to the Courts.

The signed Consent Decree of the "Big Three" was signed on May 26, 2010 (Exhibit E). with periodic monitors and Civil Proceedings for about 8 years; one instant where it was rebuked to Tom Dart "Now this is a Constitutional violation" in one account by a news article. The Honorable continued to emceed over the proceedings, making emendation as needed when cases skirted outside the proscribed Constitution's constraints; the process was consequently dissolved at the high cost of the future health of detainees within the walls of CCDOC/CCS that were now outside the auspice of the Federal Courts, like me and my ordeal of losing an entire colon. Yes, Tom Dart made superfluous, and superficial corrections and increased the livelihoods of some overseeing officials, but with the belly of the Jail institution's mechanism still broken of CCS; the lifestyle on detainees, Deputies, and personnel that worked directly in some of the most derelict Divisions amounted to nothing more than a memorandum circulated of the expected inspection visits dates of the DOJ experts. The County Jail would request staff to be prepared for their arrival by blitzing detainee workers to order the appearance as best they could. Throughout CCDOC, corridors resounded with the echoes of Directors and high ranking officials in suits yelling, "The DOJ is Coming, The DOJ is Coming" to all ranked subordinate Deputies, making them Paul Revere's to every unranked Deputy; before making a hellish charge to band-aid the unmanageable amount of backlogged workorders only for the briefest time of the visits.

After the last investigators click - click of his hard soled shoes leaves the compound, a breath and sigh of relief is expelled and the return of indifference, assumes its rightful place in the culture of CCDC. The beneficiaries of the Consent Decree, the detainees, never knew of its existence or why the DoJ made quarterly rounds at the compound, so not one detainee during its existence knew of their Right to evince the Judgments of the Decree; this is evident because not one intervention action was filed due to failures stemming from the Decree, but several causes of actions were initiated against CCDC - independently - for violating the Consent Decree about: sanitation, Medical Care, freedom from assault, and more while the Consent Decree was in effect. It is uncontested that there was no lack of deficiencies that the Original legal document sued CCDC. Still present after the Consent Decree, but what has changed was the lack of appetite to entertain them or attribute them to the Consent Decree. The Northern District, Eastern Division, enjoining me is not because I am abusive or undermining the integrity of the judicial system, but because of the antithetical Appellant has been articulate in conveying his injuries, properly evoked his ability to ascertains his Constitutional Rights respectfully in this forum; have been courteous and cordial to policy and procedure; but most of all he has been effective at espousal of all the flaws in the chinks of armor that CCDC has put up. The Honorable has for some reason been advised

to hinder Appellant and is actively litigating against him from the Bench (Exhibit G), when for centuries the Court of Second Judgment has concurred with "Legal Rights and Remedies" of a Citizen over duressment. [see, e.g. Richard's Appeal, 57 Pa. 105, 112 (1868); McCann V. Chas. Power Co., 211 N.Y. 301, 305, 105 N.E. 416, 417 (1914)]:

"A Court of equity can never be justified in making an inequitable decree. If the protection of a legal right even would do a Plaintiff but comparatively little good and would produce great public or private hardship, equity will withhold its discreet and beneficent hand and remit the Plaintiff to his 'Legal Rights and Remedies'" (see also Penn v Baltimore, Ivesy Senior *444, 27 Engo Rep 1132- (he 1750))

The evidence of CCDOL's mismanagement and lack of care for detainees and Deputies was seen in the midst of the Covid-19 Outbreak; at one point every major news media outlet crowned CCDOL with the title of number 1 Hotspot for Covid-19 transmission and contract in the U.S. - "Pontifex Maximus de Corona". The Appellant knew this and used the pathways carved out by Title 42 U.S.C.S. section 1953 to do exactly what Congress intended for the legal vehicle to do, in held

each municipality or person cloaked with the shield of governmental authority and law responsible for the Damages rendered in their Duty of care, imbedded in the principles of their Oath and when they go beyond these Oaths and injure or harm the average American by violation of their Constitutional Rights, a form of redress shall always be made available.

In one of Appellant's 17 actions against CDec, the allegations "resulted in loss of his entire colon" after a 3 month stay in Cook County's Hospital-Strangers and with multiple 20 plus hour surgeries; dropping from a solid muscle build 250 lbs athlete to a barely recognizable 90 lbs.

Appellant endured chemotherapy in an attempt to kill a host of bacteria in his colon contracted in CDec Division 9.

The Appellant was reduced to being fed intravenously through a special I.V. called P.I.V. line in his neck to supply his body with the desperately needed nutrients to survive because due to his colon swelling and stomach rupturing again the muscles stopped functioning for over 30 days, so Appellant could no longer orally consume food and properly digest. After explosive bloody bowel movements ever 15 minutes, diaper rashes, and pain so severe Appellant prayed for death's his only option was a colosectomy that would leave him scarred and handicapped for life. The Appellant would go from an active physically fit basketball, swimming, and highly energetic 20's year old to now be reduced to psychotropic medications and pain pills to abate his chronic daily pain. The Appellant attempted

to take his own life several times and only his medications keep him functioning. The Appellant did his part to inform CCDC staff he was "defecating blood" where one or two Deputies told Appellant they "had to see the blood before they call it in", Appellant wrote grievances, medical slips, and continually reported he was ill stating he was "vomitting blood", inter alia, "in fear for his life and just wanted to see a doctor" (Exhibit F). 10 years earlier the DOJ stated, "CCJ fails to adequately treat, contain, and manage infectious disease. This failure is dangerous and places inmates, staff, and the community at unnecessary risk of serious health problems. CCJ's mismanagement of T. Bacteria ("MRSA") and other infectious disease deviates from generally accepted Correctional medical standards" (Pg. 53 DOJ Letter) one of Appellant's bacterias he contracted was "MRSA" and a host of others. "The sick call process fails to provide adequate access to medical care" (Pg. 56 - DOJ Letter - Inadequate Access to Medical Care). The Honorable was more well versed than any other in the Northern District of Illinois, Eastern Division, of these facts and validity of the accounts by Appellant's pleadings. The Appellant was not seeking some contriving way to become wealthy or destroy CCDC's in fact, prior to this detention Appellant has had zero contact with Cook County for any reason because he is from Kane County, Barrington area. He was completely blindsided by the derelict conditions he was subjected to and the atrocities he had to

So much for some of which were the lives of wading through
smoke filled trees, drug laden lakes, and placement in cells without
working facilities or lights; some rooms were so dark you were
required to use an actual "Sail candle" to see at night. The
Appellant is not motivated by spite or fiscal enervation, but by
experience and the loss of a major piece of himself both
mentally and physically that he shall never regain, no matter
the outcome of the Adjudication. This spark that has been
ignited within the Appellant shall not be extinguished, but
flourished at the slightest prospect that what happened to him
may be deterred or abated from happening to others in the future.
The Honorable knew that every claim presented to her
Bar bore the uncanny resemblance of changed truth
and resonates honestly because for years she examined the
function of the Consent Decree. Not one of Appellant's claims
were argued or dismissed on the merits but on illegitimate
assaults of I.F.P. application techniques of "fraud",
regarding the Defendant's Attorney to file a joint dismissal
again at the beckoning of Honorable Virginia M. Kendall
on the syllogism; that because my calculations were incorrectly
given to me by the Law Librarian; no matter who or how the
calculations came about; through me signing my name at the
end of the application; I am fully responsible and deserving of
the most severe sanction of Dismissal, and ignoring the
"Authorized Officers" signature with those incorrect calculations.
(Exhibit 6). The Honorable still, under these premises

alleged that I was a "fraud" and was somehow or has
"concealed assets" which would be quite difficult to do if the
only assets I possess are controlled by the very individuals I
have brought civil actions against. (Exhibit H) The allegations
have not been founded nor had there been an opportunity for a
hearing to be held to vet out the truth; instead a one-sided argument
was conducted with the CCDOC Defendants through their
representative, ASA Madam Danielle Mikhail, proffering a plethora
of parole evidence, live audio taken out of context and
without full colloquial context, some conversations and dialogue,
yet a ruling was sent via mail (Exhibit H) Under all
pretext this was a summary judgment guised as a simple motion
to dismiss a valid claim, that carried the potential to rattle
the foundation of CCDOC and all of this was because of
literally \$34.00 because another detainee bought plaintiff
some soap that CCDOC knowingly refused him. That was the only
incident where Appellant's brother paid back someone for a good
deed and the Appellant did not believe he was violating a
rule and if he was he did it unaware and inadvertently
he attempted to reconcile by paying the court the same balance
to save his surviving litigation but was refused and such
effort and all 8 of his claims were dismissed with
prejudice even the most severe of which he lost his claim. The
Appellant challenge the State to produce just one other
incident where his brother in the last 4 years put money
on anyone's account and he would ^{on} persevere in appeal the

dismissed actions. The State and Court were silent to the challenge and could only produce the one incident that if anything was a mistake not a "continued scheme to divert funds into other detainees accounts", which the Honorable Judge Virginia M. Kendall is trying so hard to convey. The Appellant is no "Fraudulent" "unlawful" fiend as the Kendall Court is so desperately attempting to portray but he really is broke, destitute, dispendent, and any other analogy for penury. The Appellant has been detained for 5 years from the age of 24 in Cook County's notoriously infamous criminal system, where he is challenging his unconstitutional detention in a Habeas Corpus in the Illinois Supreme Court; "In re: Hughes v. Flaherty - McDaniel 516", and the only assets he has ever owned are the small deposits that make up his balance on his trust fund account, which he has provided in entirety to the Northern District of Illinois more than the 12 month requirements. The Appellant does not have any undisclosed accounts, trusts, nor possess any realty or vehicles, but depends on the small irregular deposits from family members when it is possible to free some cash from the responsibility of caring for Appellant's 3 little girls. The Appellant does have 3 little girls that are dependant on him even though he is detained and impoverished, if not able financially, Appellant invests in his children emotionally and spiritually always being a moral voice to the issues, and woes of toddler like my bring to his children.

The only fact that the Appellant concealed from the Court is the fact, of him being a father and not some insatiable instigator for wealth, but "In Si Tu", the future of his precious Gems' well being. After several unheeded violations of Federal Rules of Civil Procedure by the Defendants, the Honorable dismissed 17 of Appellants' claims in collusion with the State Attorney Office, as a tool implemented for dismissal. Through direction and support of the Honorable Virginia McKendall, they were actually Ordered to move for a unified dismissal motion of the remainder of Appellants surviving 8 actions in one final sweep, to allege "fraud on the Court" because Appellant's brother gifted one detainee exactly \$139.00 for giving his brother (Appellant) desperately needed soap when CDC was actively and purposefully refusing to give Appellant any Hygiene-Indigent Kits in the midst of Covid-19's spread in RTU Divs. (Exhibit 5.). The Honorable persuaded the Executive Committee to forbear Appellant from filing any future litigation as a pro-se plaintiff until his past due filing fees are paid in full; on the exact claims that the Honorable dismissed. Knowing the plaintiff can't afford the \$5,000 in fee this becomes a de facto ban on Plaintiff-Appellant from filing any more meritorious claims on CDC that lies in its jurisdiction. I must admit, it was quite a play ^{position} for an immovable object in my path, because of my destitution has the ability and

by product of closing me to any Federal Forum to grieve my constitutional injuries, and as well as protect CCDOC from any future litigation because I am detained in the only Jurisdiction for constitutional relief available. This is as defeat as Aeneas's farewell from Queen Dido off the banks of Carthage as he departs on to be the progenitor to "delenda est Carthago" of Cato the Elder. The Appellant's claims were never truly entertained by the Court, but for more than a predetermined and prefunctionary experiment of judicious procedure to create the fallacious appearance of Due Process, with the true perjurious Meritum motives hidden behind a facade of Justice. The Honorable denied the Appellant of the Right to have the tier of facts decided by his peers but treated his pleadings to the Courts as panegyric writings for an already deceased jurat litigant. Every action was dismissed right before the conclusion of Discovery and preparation for trial, it was as if some "Jus non scriptum" between the State Attorney's Office and the Court, that a rapid method must be deduced to dispatch the remaining actions so zero actions will be entertain for the Juxta of public opinion. The Appellant was left defeated, exhausted, and embarrassed about our current state of Constitutional "Corpus Juris Secundum" in the Federal District's "Coram non iudice" of the United States Supreme Court

that he would only be resolved if our Highest Court is aware of the conflicting laws and policies as well as the skewed taken on the PLRA payment scheme it specifically calls for no more than 20% shall be deducted from a IFP status claim but the 7th Circuit has interpreted this as mean 20% for each filing one on top of the other taking 100% of a trust fund for any one with 5 or more pending actions. If the Court wishes to address this it would be most helpful but if not it is understood. This background is important because this was the improvised Bench Legislation from the Kendall Court's Bar that paved the way for The Executive Committee to use as a forerunner bias and precedent groundwork for such a bold action of enjoinment. The history must be told so that the truth is educed and shed on the unflattering and unscrupulous measures taken by a Court of law to erase and expunge the liability of the wealthy Defendant and damages of the Plaintiff by dismissing 17 cases of actions after screening on minor fixable misrepresentation done by the Law Library. The Court not allowing one claim to be argued and then a step further in enjoining Appellant thereby taking a Right that has been vested in the person for more than 20 scores. The Northern District has successfully done what the Constitution deliberately states cant be done in abnegating the Appellants Rights. A Right has been taken from the Appellant not because of his actions but because of, no doubtly,

my ability to successfully bring actions, so for my invoking my Constitutional Right - I lose my Constitutional Right. The track record of these shall be laid bare and exposed to the Sun to manifest its impurities to the Light and the American people shall decide if it will hold the weight of **Justice**.

The Honorable could not stop the Appellant from contracting Covid-19 or prevent his cellmates: Jeffrey Penolletan, Nicholas Lee, and others from dying by losing their battle with the virus in front of him; where officers wouldn't even come on the tiers for help. But what has been successfully halted was a call to accountability for Tom Dart and the CDC Administration in the Public forum. Appellant - Plaintiff has been restricted from bringing the practices of a standard of derelict conditions of confinement to the attention of his press at large in society. The DOJ submitted thousands of documents for public consumption about the coming storm, this is no shock to the Dart Administration, it is more cost effective to be ineffective rather than take on the expense of efficiency and constitutionality. There was no secret to what potential this outbreak would have for all involved directly in the day to day of detainee operations of the jail, yet mismanagement continued and the superficial corrections only lasted as long as the DOJ visits. It is the mechanism of CDC that perpetrates dilapidation and decay not because they want to hurt detainees, but because of it cost efficiency this is why the Appellant was apt and able to plead 17

actions in the Honorable's Division and if it was not for the demerits of the pleadings and ultimate enjoinment, Appellate peers would have been witnesses to this exposure of poor standards of infestation of: Rats, mice, Cock roaches the size of quarters, small German house roaches, large black water bugs, drain flies, horse flies, fruit flies etc. that have been promulgated throughout the tiers of CDC for years. It was the tireless work of Congress, The President, and The Supreme Court that led to the Steps of the Federal Tribunals of this great nation; that led to every American having access to every Constitutional injury; that requires that the process and protections of the Law are fulfilled for acts amounting to more than "De Minimis" damage as an unbiased forum to make one whole, if not complete, from his injuries. What a magnificent Satire! A Tonic of Equality is donned; A Royal Purple Satchel of Jurisprudence is laid safely on the Shoulders; the Laces are strapped brilliantly with the Thread of Righteousness; A Laurel of Sophistication is fitted squarely on the imperial Head of indignation; and in the reflection a Sutton Hoo Buckle is imbued with the epitaph, "Civilization and Truth Settles Here"; the last motif is the laborious blow of the Gavel and the Sonorous inordinate clash of Vindication. The societal pressures by the private interests of those in position of authority within a given government institution is even permeable to those charged with being the Custodians of the Constitution, which is why it is so imperative for the Supreme Court's intervention, a necessary body for the corrigible task not able to be done by local municipalities or authorities. For the Supreme Court's elevation high above the under influences and reach of the temptations of Society, are what makes it capable to handle such an Issue.

President Grant was aware of this fact even back in 1871, when he wrote and urged the Chambers of Congress and The Supreme Court to come up with a Federal solution to local terrors:

"A condition of Affairs now exists in some States of the Union rendering life and property insecure and the carrying of the mails and collection of the revenue dangerous. The proof that such a condition of affairs exists in some localities is now before the Senate. That the power to correct these evils is beyond the control of State authorities I do not doubt; that the power of the Executive of the United States, acting within the limits of existing laws, is sufficient for present emergencies is not clear. Therefore, I urgently recommend such legislation as in the judgement of Congress shall effectively secure life, liberty, and property, and the enforcement of law in all parts of the United States. It may be expedient to provide that such law as shall be passed in pursuance of this recommendation shall expire at the end of the next session of Congress. There is no other subject upon which I would recommend during the present session" (Congressional Globe, 42 Congress, 1st session - March 23, 1871 - 236, 244)

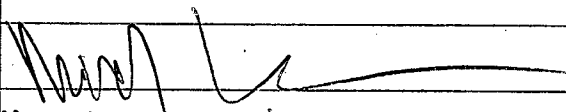
As stated when Gaius Julius Caesar crossed the Rubicon in 49 B.C.E and is no less relevant now, "The Die is Cast" and I have made no "Amicus en Curiae de lex ordinandi" by the production of this legal document both the District Court house and now the Appellate has treated like, "liberam legem amittere" is the Appellant's predetermined status. I have been asteresized by the Law and condemned for my demand for Justice and accountability. I must not turn back nor be intimidated into submission, so I must humbly push forward - for I no longer see the security of land behind me; I can not relent to the pressures of this stage I have been jettison to, but come confident and boldly to the podium of Justice. I respectfully must yield to the Jurisprudent maturity more cogitative than I shall ever possess.

A question of great importance both in "Custos Morum" and a continued "Comitus Gentium" among the aggregate Chambers as it stands in America the "Comitatus" and aphorism is currently true "Cook County edicta perpetua est Regis de ius lex eo ipso; Cook County sic de similibus Deus absconditus".

A layman has presented a profound question and prays that his lack of resources at his disposal and knowledge of the law does not impend in his message. I hope I have given the Honorable a palpable legal article to digest and have done those affected by this ruling proper and fair. I pray that my informality and attempt to sound Juristic is excused and only the Supreme Judicium of The United States

Court may refine this inequipoise of Right and Wrong through the Scrutiny deep in the well of the crucible within the Halls of the Historic Supreme Court and reduce the impurity to equity this Country deserves. The security of the Rights and Fate of many Pro-se detained litigators and possible Pro-se litigator in total now rest on the seasoned Oaths of the Bar in the Supreme Court's Chambers Protecting the most helplessly vulnerable of societies outcast from Subjugation of the fiscally efficient methods of corrections is paramount to a sustainable future of constitutionality within the walls of Jail and Prisons everywhere and to be prevented from bringing forth the unconstitutional conditions of confinement is a theft of the Voice of the already muted penury and destitutely divested. "To the Strongest" are the last words allegedly spoken by Alexander The Great on his deathbed; we are that Strongest, from the incarnation we have stood up for what is Just over what is popular; we must once again in a Time of Peril find the Strength to be united and resist the ebbs of derision to one day finally enervate the Stigmas of inequality.

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



Michael T. Hughes

20151106050

Date:

Reasons For Granting The Writ

The Appellant is under the belief that the F.R.C.P, PLRA, and no none statute gives the Court the authority to dismiss an action on the premise of ILlegally acquire evidence by the defendants

The Appellant believes that the enjoainment is a violation of Appellant's right to bring claims against an aggriene government entity.

Conclusion

The Appellant prays that the enjoainment is lifted and the action dismissed because plaintiff's brother, out of generosity, paid back one single detainee's is re-instated so he may hold accountable those who have impaired his life.