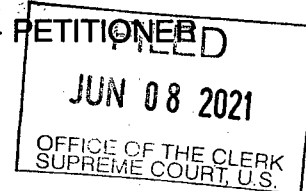


No. 20-8457

IN THE  
SUPREME COURT OF THE UNITED STATES

Michael Izell Seals  
(Your Name)



vs.

K. Allison, et al. — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

U.S. Court of Appeals For The Ninth Circuit  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Michael Izell Brown-Seals  
(Your Name)

P.O. Box - 698  
(Address)

UKiah, CA, 95482  
(City, State, Zip Code)

(916) 968-9515  
(Phone Number)

### QUESTION(S) PRESENTED

- 1.) Did defendants enforce, improper CDCR - California Department of Corrections and Rehabilitation, CDCR "Probe Conditions" upon the Plaintiff-Appellant on November 25, 2013? Per P.C. 290, sex offender status?
- 2.) Did defendants, violate, Plaintiff-Appellant constitutional rights, as to the "Change of Law" on March 2, 2015, by the California Supreme Court. Pursuant to the civil case of: In re William Taylor et al. on Habeas Corpus? Violations of the Plaintiff-Appellant's, First and Fourteenth Amendments of the United States Constitution. Please take Judicial Notice, the above mention, "Change of Law" of, In re William Taylor et al. on Habeas Corpus, effects all sex offenders in California on CDCR - California Department of Corrections and Rehabilitation - Probe.
- 3.) Did defendant - Appellees, acts of Violation, against the Plaintiff-Appellant, "set in Motion", several "on-going" violations of the Plaintiff-Appellant's First, Fourteenth, Sixth, Fourth and Eighth Amendment of the United States Constitution?
- 4.) Did defendant - Appellees, violate, Plaintiff-Appellant First and Fourteenth in "Removal" from state court? ②

## LIST OF PARTIES

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

## RELATED CASES

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## TABLE OF AUTHORITIES CITED

### CASES

### PAGE NUMBER

- 1.) *In re William Taylor et. al.*

### STATUTES AND RULES

- 1.) First Amendment.
- 2.) Fourteenth Amendment.
- 3.) Fourth Amendment.
- 4.) Sixth Amendment.
- 5.) Eighth Amendment.

### OTHER

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 AR 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 \_\_\_\_\_ 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 April 16, 2021.

☐ 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

- 1.) First Amendment - Retaliation of the exercise of the First Amendment
- 2.) Fourteenth Amendment - Violation Pursuant to In re William Taylor, et al., on Habeas Corpus, per California Sex Offenders on CDCR Parole, under P.C. 290.
- 3.) Fourteenth Amendment, subsequent on-going Violations as set forth in the State Court initial Civil Case of Alene Shimazu, et al. vs. Michael Izell Brown - Stealy, vs. Alene Shimazu, et al., filed September 11, 2019, thereabouts in Superior Court, County of Mendocino, Case No. SCUK-CVPO-2019-72555.
- 4.) Fourth Amendment.
- 5.) Sixth Amendment.
- 6.) Eighth Amendment.



### STATEMENT OF THE CASE

Plaintiff - Appellant, Prior and on November 25, 2018, was subjected to improper CDCR California Department of Corrections and Rehabilitation - CDCR parole conditions by Defendant - Appellees as explained in Full in the state Court, in the ~~the~~ initial Civil Case of: Alene Shimazu et al. Filed: September 11, 2019, thereabouts, Case No. SCUK-CVPO-2019-72555.

If the Court would now Take Judicial Notice to the above mention Civil Case, Here, the Court shall find Cause, that, the Plaintiff - Appellant suffered on going violations of his First, Fourteenth, Fourth, Sixth, and Eighth Amendments of the United States' Constitution, setting in Motion, For the Defendant - Appellees, to "retaliate" against the Plaintiff - Appellant, For exercising his First and Fourteenth, Fourth, Sixth and Eighth Amendments of the United States' Constitution. When Defendant - Appellees ~~the~~ Filed a "Motion" of Removal of the Civil Case of Alene Shimazu et al. From the State Court Superior Court, County of Mendocino, to the Federal Court, United States District Court Northern District of California. Where Defendant - Appellees changed the "Name" of the above mention Civil Case, in retaliation to "confuse" the Case and Courts, without the transfer of the Court Records for the initial Civil Case of Alene Shimazu. Here when Defendant - Appellees retaliated by changing the Civil Case to K. Allison, it violated Plaintiff - Appellant, First and Fourteenth Amendments to a "Fair" judgment. (21)

REASONS FOR GRANTING THE PETITION

Please Take Judicial Notice, to the ~~initial~~ initial filed State Civil Case of: Alene Shimazu, et al, Case No. SCUK-CVPO-2019-72555, Superior Court of California, County of Mendocino.

Here, this above mention, "State" filed Civil action, will show cause, that, if not, for the retaliation of the plaintiff-appellant for exercising his First and Fourteenth Amendment rights, to challenging above mention improper enforcement of the P.C. 290 sex offender requirement, under improper CDCR Prote conditions, on or before, November 25, 2013, in the County of Mendocino, by documented defendant-appellees, in both state civil Case of: Alene Shimazu, et al, Superior Court of California, County of Mendocino.

And Federal Court Civil Case of: K. Allison, et al, ~~therefore~~ United States District Court, Northern District of California.

Here, both above mention, "state and Federal" Civil Cases, will show the Plaintiff-appellant and: Michael Izell Brown-Seaks, or Michael I. Seaks.

Plaintiff-Appellant will argue, that by defendant-appellees, own admission, in the Filing of their own, "motion" to "remove" the initial Civil Case of:

Alene Shimazu, et al, Case No. SCUK-CVPO-2019 (22)-72555, Superior Court of California, County of Mendocino, to the above mention, Federal Court. Here, defendant-appellees, violated Plaintiff-Appellant. First and Fourteenth to a Fair Judgment. When they in retaliation Failed to assist in removal of entire Record.

### CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Michael J. Brown-Seab

Date: 6-8-21