

21-5130

IN THE
SUPEME COURT OF THE UNITED STATES

MICHAEL STOREY

V

CITY OF ALTON

Brief

Submitted by

Michael Storey

P.O. box 112

Cottage Hills, IL 62018

Brief

This Court denied Plaintiff's petition of certiorari on October 4, 2021

Plaintiff, Michael Storey filed this brief on grounds Defendant has violated Plaintiff's rights under the U.S. Constitution.

It is the duty of the Supreme Court to enforce the U.S. Constitution.

Amendment 5 of the Constitution states "No person shall be deprived of life, liberty or property without due process of law".

Defendant has taken property belong to Plaintiff without due process of law and making no compensation to Plaintiff for such action.

Said taking was by means of refusing to issue permits that would allow Plaintiff to develop his property.

Defendant has presented no documentation showing it has any legal right to prevent Plaintiff from developing said property.

Defendant has an official City Code that sets the rules and standards to be applied to all developments with-in its jurisdiction.

Both Defendant and Plaintiff agreed to the terms and standards for developing a manufactured home community on the property Plaintiff owns in Defendants jurisdiction.

Defendant allowed Plaintiff to start his development under these terms and condition specified in Defendant's Official City Code.

The terms and conditions were easy to understand and both parties agreed to follow them.

Shortly after construction was started Defendant began changing the terms and conditions plaintiff had agreed to.

These changes were made by city officials and never presented or approved by plaintiff's city council or any civil court thus not legally binding to either party.

The requirements Defendant was imposing on Plaintiff far exceeded Defendant's code.

Defendant's new requirement began to get more restrictive on the plaintiff until such time defendant advised plaintiff could no longer use his property for any construction that requires a water supply not readily available to the property.

Defendant further advised plaintiff that buildings on said property would have to be removed.

Defendant had issued numerous permits for the work Plaintiff has completed on said property.

Defendant has simply refused to issue additional permits such as building, occupancy, plumbing and electrical required to complete the development.

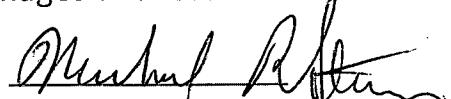
Defendant's refusal to issue said permits and approvals has taken plaintiff's property.

Defendant has never filed any document with any court that would allow defendant to change its ordinances without approval of the city council and official city code.

Plaintiff has suffered financial losses in excess one million dollars and now own 5 acres of ground that has absolutely no use or value.

Defendant has taken plaintiff's property without due process as required by the Fifth Amendment to the Constitution.

Defendant must be held liable for damages and losses to Plaintiff.



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