

21-5213

ORIGINAL

No. _____

Supreme Court, U.S.
FILED

MAR 23 2021

OFFICE OF THE CLERK

IN THE

SUPREME COURT OF THE UNITED STATES

ZACHARY BOUVIER TAYLOR — PETITIONER
(Your Name)

vs.

Georgia; GA Dept of Corrections; et al RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

SUPREME COURT OF GEORGIA
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

ZACHARY BOUVIER TAYLOR
(Your Name)

A.S.M.P. 1DB-Z-220
(TRANSIENT) 3001 GORDON HWY
(Address)

GROVETOWN, GA 30813
(City, State, Zip Code)

A.S.M.P. (TRANSIENT) (706) 855-4700
(Phone Number)

QUESTION(S) PRESENTED

This Court is to consider that the trial court, Harris County, GA Superior Court, lacked evidence to prove Petitioner Zachary Bouvier Taylor knowingly and intentionally guilty beyond a reasonable doubt. In Re Winship (1971).

Review the voir dire jury selection process in the trial court that resulted in a Batson challenge of the majority white jury at Taylor's unjust jury trial.

This Court is to address numerous other applicable issues such as how officials of the Georgia Department of Corrections have violated Taylor's God-given, human, civil, and constitutional rights, including, but not limited to false imprisonment of Taylor and the urgent demand to release him into the custody of his family.

This noble High Court is to award relief and damages to man of God Zachary B. Taylor because GA Dept. of Corrections officials have acted with deliberate indifference towards Taylor and administered involuntary drugs to him for alleged mental health.

Also, United States Army Veteran (last four SSN: 5140) and former United States Military Academy at West Point, New York Cadet Zachary Bouvier Taylor is suing the GA Dept of Corrections under U.S. Supreme Court Rule 40 for Veterans to proceed without payment of fees or costs with this Motion for leave to proceed on papers. Please order GC to pay \$17 million.

Finally, review how mental health counsellor Bethany Barcomb, Dr. Reddy, Dr. Harpold, Counsellor Hopkins, the Psych nurse Holmes, et al have plotted to mistreat and defraud Taylor and his family.

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:

Georgia Department of Corrections, and officials, et al.

RELATED CASES

- Georgia V. Taylor, No. 05 CR 190, Harris County, Georgia Superior Court. Judgment entered February 27, 2015.
- Taylor V. Georgia, No. S18A0276, Supreme Court of Georgia. Judgment entered May 7, 2018.

Offender Name: TAYLOR, ZACHARY BOUVIER GDC ID: 1205375
House: 10B-2 Bed: 220-B Age: 52 Security Level: MEDIUM

Date	Activity Name	Start Time	End Time	Report To	Activity Location
02/26/2021	PSYCHIATRIST APPT.	09:00	10:00	MENTAL HEALTH	MH ADMINISTRATION
Comments:	DR. REDDY				

Offender Name: TAYLOR, ZACHARY BOUVIER GDC ID: 1205375
House: 10A-2 Bed: 124-B Age: 51 Security Level: MEDIUM

Date	Activity Name	Start Time	End Time	Report To	Activity Location
05/15/2020	PSYCHIATRIST APPT.	09:30	09:45	MENTAL HEALTH	MENTAL HEALTH
Comments:	DR. HOBBY (FOLLOW UP)				

Offender Name: TAYLOR, ZACHARY BOUVIER GDC ID: 1205375
House: 10A-2 Bed: 124-B Age: 51 Security Level: MEDIUM

Date	Activity Name	Start Time	End Time	Report To	Activity Location
07/02/2020	RADIOLOGY	07:00	13:00	MD NURSING AREA 6A	MD CLINIC-CT / MRI
Comments:	MRI				

Offender Name: TAYLOR, ZACHARY BOUVIER GDC ID: 1205375
House: 10A-2 Bed: 124-B Age: 51 Security Level: MEDIUM

Date	Activity Name	Start Time	End Time	Report To	Activity Location
06/24/2020	LABORATORY - OTHER	07:30	07:45	MD NURSING AREA 6A	MD NURSING AREA 6A
Comments:	BUN, CREAT(SR) XRAY/JOE				

Offender Name: TAYLOR, ZACHARY BOUVIER GDC ID: 1205375
House: 10B-2 Bed: 220-B Age: 52 Security Level: MEDIUM

Date	Activity Name	Start Time	End Time	Report To	Activity Location
06/09/2021	PHYSICIAN APPT.	14:00	14:15	MD NURSING AREA 6A	MD ROOM DR-DAVIS
Comments:	FU HEMATOLOGY FOR DR SURAJ				

TABLE OF CONTENTS

OPINIONS BELOW.....	1
JURISDICTION.....	2
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	3
STATEMENT OF THE CASE	4
REASONS FOR GRANTING THE WRIT	10
CONCLUSION.....	11

INDEX TO APPENDICES

The United State Supreme Court may request a copy of this case and send to Taylor, APPENDIX A Supreme Court of Georgia Case No. S18A0276 has been missing from the personal possessions of Petitioner Zachary Bouvier Taylor ever since someone stole and took Taylor's legal documents, APPENDIX B The U.S. Supreme Court may request a copy of this case and send to Taylor, Transcripts from Harris County, Georgia Superior Court OS CR190, where the court entered judgment on February 27, 2015, may be APPENDIX C in possession of Columbus, GA attorney Alfonza Whittaker,

APPENDIX D

APPENDIX E

APPENDIX F

*Please note how GDC officials have issued "call-outs" to Taylor for unnecessary and unwanted medication
* IT IS AN URGENT REQUEST THAT EVEN
WITHOUT THE APPENDING OF LOWER COURT OPINIONS
THAT THIS NOBLE COURT FILE THE ENCLOSED
PETITION FOR WRIT OF CERTIORARI. ☹

TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBER
<u>In Re Winship (1970)</u>	4
<u>Batson v. Kentucky</u>	4
<u>Miranda v. Arizona (1966)</u>	5
<u>Tinker v. Des Moines Iowa Independent School District</u>	5
<u>Barnett v United States (1943)</u>	5
<u>First Amendment to United States Constitution</u>	5
<u>Farmer v. Brennan (1994)</u>	7
<u>Monell v. Soc. Servs. (1978)</u>	7
<u>Pabon v. Wright (2006)</u>	7
<u>Cobb v. Grant (1972)</u>	8
<u>In Re Storar (1981)</u>	8
<u>Cruzan v. Dir. Mo. Dept of Health (1990)</u>	8
<u>Washington v. Harper (1990)</u>	8
• Contracts Law. A document is not enforceable unless it is in writing and signed by all parties not under duress or coercion.	6
• Augusta State Medical Prison handbook.	6
• Detinue and Replevin-to possess property that someone has tried to take wrongful possession of.	6
• 42 U.S.C. 1983- The "under the color of state law" section of the Code	7

OTHER

- May 04, 2020 Memo from United States Supreme Court Clerk Scott S. Harris. 4
- Petitioner Zachary Bouxier Taylor's Georgia Department of Corrections I.D. #1205375. 4
- Prayer Bible, by Dr. Morris Cerullo. 5

STATEMENT OF THE CASE

~~This resubmission of this petition is untimely, but as of the~~
May 04, 2020 memo from United States Supreme Court Clerk Scott
S. Harris indicated, an untimely petition for a writ of certiorari in
a criminal case may be docketed with a notation as to its
untimeliness. This Petition for a writ of Certiorari was due by October
04, 2018, late by October 15, 2018. It is untimely but must proceed
because of the compelling interest of the court to exonerate and
liberate Zachary Bouvier Taylor from 10B-2-220 of Augusta State
Medical Prison in the Georgia Department of Corrections, GDC #: 1205375.

A lack of evidence in the case cannot prove Taylor knowingly
and intentionally guilty beyond a reasonable doubt. In Re Winship (1970).
Zachary does not possess the mens rea or criminal intent and the
actus reus, the physical act, beyond a reasonable doubt. His attorneys
raised a Batson challenge about the racial composition of a majority
white jury at Mr. Taylor's force of a jury trial. Denial of fairness has
put Taylor in prison. The time is ripe to do right.

Also, numerous other applicable issues are pending in this case such
as numerous violations of Taylor's God-given, human, civil, and
Constitutional rights. This High Court is to move out with all
deliberate speed to release Taylor from false imprisonment in 10B-2-220
of A.S.M.P., GDC #: 1205375. Mr. Taylor has been the target of much
persecution and violation of his Fourth Amendment United States
Constitutional rights by officials of the Georgia Department of
Corrections such as Black man Officer Cunningham, Officer Valerie
Flournoy, Sergeant Moton, and G.E.R.T. Team Officer Smith, acting
in collusion with inmates Lorenzo Bradley, James A. Heard, Walter
Ferrell, Oscar Ramey, and Bryant Demetrius Lynch (4)

STATEMENT OF THE CASE (Continued)

and a mysterious Doctor Mendoza, who has experimented on Mr. Taylor with medical malpractice and treated Mr. Taylor like a human guinea pig. GDC officials such as Officer Taylor in Crisis Stabilization Unit and Officer Hubert have placed Mr. Taylor in unsanitary, squalid living conditions. When they moved Mr. Taylor, they did not apprise him of his rights pursuant to Miranda v. Arizona (1966). Taylor has the right not to testify.

GDC employees labeled Pentecostal minister and Christian Life School of Theology Graduate Reverend Zachary B. Taylor as Mental Health Level 4 and placed him under an involuntary medication order because they have tried in open conspiracy to block his ministry. Zachary Bouvier Taylor does not leave his rights to freedom of speech, freedom of religion, and freedom of expression at the door to the jailhouse, GDC, school, or workplace. Tinker v. Des Moines Iowa Independent School District. Even the Jehovah's Witnesses won a major victory before the United States Supreme Court, Barnett v. United States (1943). Religious persecution follows Reverend Zach B. Taylor just like it followed the Apostle Paul in the Holy Bible. A.S.M.P. inmates like Ryan in 10A-2 are suspects in the theft of Preacher Zach's Bibles, including the valuable Doctor Morris Cerullo Prayer Bible that Brother Taylor's mother presented to him in 2015. As A.S.M.P. mental health employees administer involuntary drugs to him, the inmates use illicit drugs and controlled substances such as marijuana, "Ice," meth, and hard liquors.

May it please the Court to order immediate release of minister Zachary B. Taylor and overturn the unconscionable conviction in Harris County, Georgia Superior Court Case 05CR190 on February 27, 2015.

STATEMENT OF THE CASE (continued)

The excessive force that victim Taylor has suffered is too egregious for the Court not to provide remedies for. Counsellor Bethany Barcomb is antagonistic to the Black "Preacher Zach" from Ellerslie, Georgia. Barcomb pressured and coerced Mr. Taylor under duress, with a notary public present, to sign documents such as power of attorney. Mr. Taylor seeks assistance for his safety and the security of his family and their property. Augusta State Medical Prison Deputy Warden of Care & Treatment Ruthie Shelton indicated that she had the street address of the Taylor family domicile or residence at 4154 GA HWY 85, Ellerslie, Georgia 31807-9124. However, Shelton would not authorize Zachary to make an emergency compassionate leave or visit to his home in October 2018 when his elderly parents became ill. Also, Michael(?) "Boogie" Linz, an inmate in A.S.M.P. 10B-2 indicated that he had the Taylor family street address. These people are aware that Bouvier is not out there in the free world to protect his family and their properties. Detinue and Replevin may help Mr. Taylor maintain his family's possession of their properties. The Second Amendment to the United States Constitution provides for a well regulated militia plus the right to keep and bear arms. A gun store advertisement announced that a person who does not protect his residence is worse than the criminal who threatens it. This Court is to remedy this urgent request with relief and return Zachary B. Taylor home to his family.

Finally, may it please the Court to award relief and damages to man of God Zachary B. Taylor because GDC employees have acted with deliberate indifference towards Taylor. For example, it was around January - February 2021 that an A.S.M.P. C.E.R.T. Team Officer unexpectedly used excessive force on Zach when

STATEMENT OF THE CASE (Continued)

The officer suddenly handcuffed Zach behind his back and held Mr. Taylor down on the floor in a mental health office while a nurse painfully injected drugs into "Preacher Zach." "Holmes" was probably the name of that nurse. Farmer v. Brennan, 511 U.S. 825, 835, 114 S.Ct. 1970, 1978, 128 L.Ed.2d 811, 824 (1994) (Deliberate indifference entails something more than mere negligence, [but] the cases are also clear that it is satisfied by something less than acts or omissions for the very purpose of causing harm or with knowledge that it will result in harm.") So-called counsellor Barcom and quack psychiatrist Ms. Reddy, from India, which worships pagan idols, are well aware that involuntary medication has harmful side effects and serious damage. ~~in~~ the man of God Zachary Bouvier Taylor, Psychiatrist Dr. Harpold said that 100 years from now, people may look back at what we did here and laugh.

GDC employees inculcate liability to their ill-advised employer under the doctrine of Respondeat Superior. The King and the King's servants can and will do some wrong. Codification of the common law is 42 U.S.C. 1983, the "under the color of state law," where Zachary B. Taylor, victim of false imprisonment and many tort injuries, sues state employees in federal court. See Monell v. Dep. of Soc. Servs., 436 U.S. 658, 694-95, 98 S.Ct. 2018, 2037-38, 56 L.Ed. 611, 638 (1978) (holding that "When execution of a government's policy or custom... inflicts the injury... the government as an entity is responsible under Section 1983").

Zachary Bouvier Taylor has the right to refuse treatment. Pabon v. Wright, 959 F.3d 241, 246 (2d Cir 2020) holding that victim of false imprisonment Mr. Taylor has a right to refuse treatment. Mr. Taylor does not know or understand what this treatment includes and what effects it may have on him. The direct side effects

of treatment are painful and serious. Some states require by law that doctors consider alternative forms of care.

See Cobbs v. Grant, 502 P.2d 1, 9-10, 8 Cal3d 229, 242-43 (1972) (finding doctors must reasonably disclose alternatives to a proposed treatment plan and the risks of any treatment. They did not offer to treat Zach B. Taylor with less intrusive, less painful, non-prescription medication such as herbs like Saint John's Wort. In re Storac 52 N.Y.2d 363, 376, 420 N.E.2d 67, 70 438 N.Y.S.2d 272 (1981) (finding that "[t]he basic right of Mr. Taylor to control the course of his medical treatment has been recognized.

Zachary B. Taylor has a right to refuse antipsychotic or psychotropic drugs. Cruzan v. Dir. Mo. Dept of Health, 497 U.S. 261, 278, 110 S.Ct. 2841, 2851, 111 L.Ed.2d 224, 242 (1990) (stating that Zachary B. Taylor possesses "... a significant liberty interest in avoiding the unwanted administration of antipsychotic drugs under the Due Process Clause of the Fourteenth Amendment." quoting Washington v. Harper, 494 U.S. 210, 221-22, 110 S.Ct. 1028, 1038, 108 L.Ed.2d 178, 198 (1990)). Such medications alter Mr. Taylor's perception, emotions, and behavior. For example, psychotic drugs can have serious side effects, such as nightmares and muscle tics (sudden movements). The law provides protection against the unwanted use of serious drugs by giving Mr. Taylor the right to refuse treatments that interfere to a great degree with the body.

A decision to treat Zachary B. Taylor with drugs triggers procedural due process protections because drugs can produce serious and irreversible side effects that represent a significant state intrusion into his body. Washington v. Harper, 494 U.S. 210, 229 110 S.Ct. 1028, 1091, 108 L.Ed.2d 178, 203 (1990) (stating that "the forcible injection of medication into a non-consenting person's body represents

(8)

a substantial interference with Mr. Taylor's liberty.

His rights to refuse medication comes not only from the Constitution, but also from state laws.

It does not take a Ph.D., nor does it take a G.E.D. to realize that God's messenger, Zachary Bouvier Taylor, has suffered false imprisonment far too long, for more than 17 years and 4 months, and maintains clear and convincing evidence that he is more of an asset to his family and society in the free world than in false imprisonment.

Whereas, this noble Court is to release Mr. Zachary B. Taylor from the Georgia Department of Corrections; overturn his unjust conviction in Harris County, Georgia Superior Court Case OS CR 190 on February 27, 2015; and review violation of his rights guaranteed by God, humanity, and the United States Constitution at the hands of GDC employees.

REASONS FOR GRANTING THE PETITION

May it please the Court to grant Petitioner Zachary Bouvier Taylor a writ of certiorari and review the issues the Petition raises as well as his ill-treatment by employees of the Georgia Department of Corrections for good cause and compelling reasons.

Please consider that the Supreme Court of Georgia has decided an important issue of federal law such as a sixth Amendment rights to a fair trial by jury, effective assistance of counsel; First Amendment rights to freedom of speech and freedom of religion, et al. Zachary B. Taylor prays that this noble federal Court will settle this discrepancy of issues. Talk show host Phil Donahue declared that the Bill of Rights or first 10 Amendments to the United States Constitution are the very fabric of our American way of life.

Taylor's lengthy false imprisonment and tort mistreatment, in addition to numerous detriments to his safety and guaranteed rights, are scarring the American Dream. It is a moral disgrace. Taylor looks to Chief Justice John Roberts and this Court to right some wrongs in this country such as denial of procedural due process, inter alia.

It is obvious that GDC officials violated Zachary's rights. Zachary has shown: (1) government officials did not tell him enough about the treatment for him to make an informed decision and allow his right to refuse treatment. Prison officials, in the scope of employment, which inculcates liability to the GDC, acted (10)

with deliberate indifference to Mr. Taylor's numerous rights,
Now; therefore, be it resolved that it is only fitting for this noble
Court to overturn the unjust conviction in the Superior Court of Harris
County, GA Superior Court Case OS CR 190 on February 27, 2015; release
Zachary B. Taylor immediately from the GDC (#1205375); return him
home to his family; and, pursue charges, claims, and damages against
the GDC for good cause. Now is the time to grant Petitioner Zach Taylor
a writ of certiorari.

Zachary Bouvier Taylor is a Black man with race and gender as
immutable traits. He is an American military veteran and former United States
Military Academy and West Point, New York cadet. He has membership in a suspect
class that has protection from CONCLUSION vestiges of historical disadvantage.
This noble Court is to exercise its affirmative duty and moral obligation to review
this matter with strict scrutiny. The time is ripe to do right. "Justice is never
given by the oppressor. It must be demanded by the oppressed." Martin Luther
King, Jr.

Respectfully submitted,

Zachary Bouvier Taylor
ZACHARY BOUVIER TAYLOR, GDC #: 1205375; (Last 4 of SSN: 5140).

Date: JUNE 23, 2021