

SUPREME COURT OF THE UNITED STATES

21-7211

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TAD TAYLOR, PLAINTIFF

v.

KENDALL LAW GROUP, et.al., DEFENDANT(s)

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PETITION FOR REHEARING

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TAD TAYLOR, Pro-se  
Fed ID: 26966-072  
Federal Correctional Institution  
P. O. Box 9000  
Seagoville, Texas 75159

**PETITION FOR REHEARING: IN COMPLIANCE WITH RULE 44**

Plaintiff, Tad Taylor, respectfully brings this Petition for Rehearing before the Honorable United States Supreme Court, and all in propria personam, sui juris, and acting on his own behalf and as his own legal counsel, hereby satisfies the Clerk of Court request for refiling in accordance with Rule 44 upon the presentment of grounds as they relate to the Claim placed against the named Defendants, and all as follows;

**WHEREAS;**

1. Defendant Kendall, in his capacity as Defense Counsel for the Plaintiff during criminal proceedings, refused to honor his client's (Tad Taylor's) demand that certain high-profile, qualified, and expert witnesses be brought before the Jury in order to substantiate Dr. Taylor's professional and ethical practices, however, such demands were summarily ignored violating this Plaintiff's Constitutional rights, including violation of his Fifth and Sixth Amendment rights.
2. Defendant Kendall, in his capacity as Defense Counsel for the Plaintiff, refused his client (Tad Taylor) any access or review of Discovery or prospective evidence brought against him throughout the criminal proceedings, thus resulting in a violation of this Plaintiff's Constitutional rights, including his Fourth, Fifth, Sixth, and Fourteenth Amendment rights to due process of the law.
3. Defendant Kendall, in his capacity as Defense Counsel for the Plaintiff, failed to defend the mens rea requirement presented by and through the prosecution despite there existing no financial motive, no abuse, overdose, or death, and minimal patients.

4. Defendant Kendall, in his capacity as Defense Counsel for the criminal proceeding, failed his client (Tad Taylor) by ignoring his client's rights to the Confrontation Clause in which, any and all questions surrounding misrepresentations, misinformation, or felony lies conveyed by and through both the witnesses for the prosecution, and the prosecutors themselves, as there existed no cross examination, no objections, and no filing for rehearing or evidentiary hearing to clarify facts and falsehoods. This shall stand as a Constitutional violation, and specifically, a violation of this Plaintiff's Sixth Amendment rights.

5. Defendant Kendall, in his capacity as Defense Counsel for the criminal proceeding, failed his client (Tad Taylor) upon his unwillingness to bring forward viable challenges to the proposed Sentencing Scheme, and specifically, through the filing of a formal Sentencing Memorandum in which the Defense Counsel ignored the opportunity to establish grounds for disparity under §3553(a) factors which would provide context to the disparity of Taylor being offered a One (1) year sentence upon Acceptance of a Plea, and the Twenty (20) year Sentence he received as a "Trial Penalty" for pursuing his rights in Jury Trial. Such disparity and trial penalty shall each violate this Plaintiff's Constitutional rights, including his Eighth Amendment rights surrounding protection from "cruel and unusual punishment" as a non-violent, first-offender, professional physician at age 65+ receiving the equivalent of a "life sentence."

6. Defendant Kendall, in his capacity as Defense Counsel for the criminal proceeding, failed his client (Tad Taylor) upon ignoring Taylor's right to an evidentiary hearing in address of an illegal seizure by federal law enforcement in its failure to read this Plaintiff (criminal arrestee) his Miranda Rights, all as a serious Constitutional violation of the Plaintiff's Fourth, Fifth, and Sixth Amendment rights.

VERIFICATION AND JURAT

WITH MY HAND AND SEAL, I, Tad Taylor, as named Plaintiff to this Cause, and in knowing the penalty of perjury upon bearing false witness before my creator and fellow-man, I affirm and attest that the statements presented herein shall stand as true and factual, and that I file this Petition for Rehearing under the guise of unsworn declaration in accordance with §1746 thereof.

RESPECTFULLY SUBMITTED ON THIS DATE: 6-4, 2022

RESPECTFULLY SUBMITTED BY: x Tad Taylor  
TAD TAYLOR, PLAINTIFF

1. 1-103 Hornick claimed patient had no need for medication, 100 million Americans with chronic pain
2. 1-165-12 Taylor and Lee did NOT conspire to dispense controlled substances, were out to help people
3. 1-167-17 Alison Bjorkman was drug addict, complained about non-narcotic Seroquel, NOT controlled substance
4. 1-168-5 Dr. Taylor did NOT lose right to practice, voluntary surrender at advice of attorney, could have continued
5. 1-168-9 Initial cash fee NOT excessive, included labs CMP, CBC, TSH, Lipid, UA, all conditions treated
6. 1-169-3 Clinic NOT pill mill, 200 patients discharged, ALL medical conditions treated
7. 1-169-16 Dr. Taylor did NOT lose job at hospital, and worked in ERs for EMCare
8. 1-170-15 Dr. Taylor had NO financial misfortune, could have retired in 2010, inherited money
9. 1-171-11 Dr. Taylor DID take insurance, not just cash, a LIE that he only had cash patients
10. 1-172-20 Lie on money, not a problem, Dr. Taylor inherited ~\$500,000
11. 1-174-21 Dr. Taylor was NEVER a drug dealer, discharged 200 patients, treated all conditions
12. 1-180-9 Dr. Taylor did NOT coach undercovers, had intakes, did free labs, treated multiple conditions
13. 1-182-7 Dr. Taylor surrendered license at advice of attorney, could have kept with small fine
14. 1-182-14 DEA Agents in office claimed Dr. saw 10 drug seekers per day, lie, patients discharged
15. 1-184-14 Search warrant lie, Lee had machine guns in face, made sit almost 6 hours, in pain, torture
16. 1-185-6 Lee had safety deposit box drilled at advice of Attorney Kennedy, DEA had no warrant, money shake down
17. 1-185-14 Lee was in Taiwan with sick mother most of time, NOT micromanaging clinic
18. 1-225-5 Prescription Monitoring Program NOT online in 2012, paper requests done
19. 3-7-12 Data DEA showed on clinic ended 9-2011 because patients limited to ~30/day including non-pain
20. 3-28-21 8 patients discharged from Pharmacist Murawsky's advice, did NOT keep them, LIE
21. 3-32-15 Dr. Taylor DID take courses on pain management, was Texas Pain Society Member, LIE
22. 3-71-8 Urine Tests NOT accurate, only for cocaine and marijuana, LIE
23. 3-74-5 Clinic in Northern District (Richardson, TX), NOT Eastern District, LIE
24. 3-84-3 Bookkeeping records NOT in Plano, just old charts, Accountant in Houston
25. 3-86-7 Rules on pain management from retired DEA Agent, Stopped Soma prescribing, limited cough syrup
26. 3-88-6 Dr. Taylor DID refer patients for X-Rays, occasional orthopedic referral, lie
27. 3-97-20 Undercovers lied in front and back clinic intakes, sad had chronic pain, told of levels
28. 3-133-21 Undercovers EXAMINED, videos actually doctored and 6 minutes cut on on one, perjury
29. 3-135-4 Pharmacist Murawsky advised patients discharged, 8 patients discharged, in 2255, given to Kendall
30. 3-147-5 Allison Bjorkman drug addict, took husband's meds, only Ambien and Seroquel prescribed, TMB agreed
31. 3-153-19 Dr. Taylor did NOT know Rick Bjorkman was drug abuser, wife was, stopped meds, only Ambien and Seroquel
32. 3-164-15 Rick Bjorkman getting Ambien and Seroquel from Dr. Taylor only
33. 3-167-1 Lie, Rick Bjorkman getting only Ambien, Seroquel from Dr. Taylor, Texas Medical Board Agreed
34. 3-169-12 TMB said get better documentation, take PACE Course (he did), 2 TMB judges said Dr. Taylor did nothing wrong
35. 3-362-2 PMP NOT online on 2-2012, several paper requests sent, LIE
36. 4-15-15 Bristow said he had injuries on intakes, treated for pain, hypertension, etc., 2/3 second video NOT shown
37. 4-21-15 Lies on office, we had many African Americans, treated all patients
38. 4-27-12 Undercover Bristow said his physician left area and on medications
39. 4-30-4 Undercover Bristow said on 2 intakes he had pain, had injuries, 6 out of 10 pain
40. 4-32-14 Undercover Bristow NOT coached, would not get pain medication if NO pain, Dr. Taylor would not give
41. 4-33-8 Dr. Taylor did examination on Undercover Bristow on second visit, video cut off, perjury LIE
42. 4-46-23 Undercover Bristow said ran out of pain medications second visit, only showed 1/2 video, UA test inaccurate
43. 4-49-16 Labs recommended, smoking cessation given, only 1/2 visit shown
44. 4-61-2 Undercover Bristow claimed visit only 2 1/2 minutes, video edited, over half cut out
45. 4-76-1 Annotation in chart, LIE
46. 4-77-4 Dr. Taylor DID pain exam and observed movements, etc.
47. 4-99-6 Bristow lied on intakes both on front and back of clinic
48. 4-100-17 This implies guilt from 7-11, NOT correct
49. 4-117-18 Blatant perjury, Corvette purchased 1-2008, not in 2010, Hauk a liar
50. 4-119-1 You cannot tell if a patient has chronic pain, a lie
51. 4-120-14 Bought Corvette on 1-2008, again perjury
56. 4-181-26 Dr. Taylor NOT involved with pill mill, you state already guilty
57. 4-186-3 Lie, undercover Washington stated she had pain and anxiety
58. 4-233-1 Alison Bjorkman drug addict taking husband's meds, only Seroquel, Ambien given, TMB agreed
59. 4-238-7 Alison Bjorkman did NOT want husband Rick to get Seroquel, she took it herself, non-narcotic
60. 4-241-17 Lie, Rick Bjorkman sent to psychiatrist, ONLY got Seroquel, Ambien from Dr. Taylor
61. 4-242-11 Non-narcotic Seroquel Alison Bjorkman's problem, she wrote about it, letter in 2255
62. 5-19-9 Drug Addict Alison Bjorkman poured out Rick Bjorkman's Seroquel, she did not like it, other meds stopped
63. 5-28-3 Kendall did NOT know who Alison Evans (Bjorkman) was before jury selection, Brady violation
64. 5-29-14 Alison Bjorkman DENIED teaching termination because of drug abuse, testimony false
65. 5-34-8 Lie, Dr. Taylor treated ALL medical conditions, Garcia witness coached, did free labs

- 66. 5-40-9 Patients NOT coached to show pain or not in pain, no PAIN METER available
- 67. 5-45-17 Patients often asked to get X-Rays by Dr. Taylor, a lie
- 68. 5-48-11 Patient volume decreased from advice of our Attorney Mark Kennedy, LIE
- 69. 5-49-10 Patient volume limited, a witness coached lie
- 70. 5-50-3 Adequate time spent with patients, treated all conditions, had doctors in training help also
- 71. 5-68-2 Witness coached, lie, care excellent, over 600/1150 patients multiple conditions treated, free labs
- 72. 5-71-1 Corvette lie again, purchased on 1-2008, NOT 2010
- 73. 5-78-11 Lie, Phentermine IS a valid weight loss drug, FDA approved for
- 74. 5-83-3 Lie, clinic NOT pill mill, time spent with patients, over 200 discharged, free labs, all problems treated
- 75. 5-87-21 Lie, patient exam NOT 11 minutes discussing Mexican food
- 76. 5-102-4 Lie, Clinic NOT in Eastern District, in Northern District, Richardson, Texas
- 77. 5-103-2 Lie, Money NOT for personal things
- 78. 5-104-6 Lie, Clinic NOT pill mill, labs done, exams done, all things treated, over 200 patients discharged
- 79. 5-136-25 Alyssa Keith lied, stated she HAD chronic pain, exam reflected this, witness coached
- 80. 5-147-5 Lie, Dr. Taylor confronted Michael Keith and threatened to discharge if another physician seen again
- 81. 5-152-18 Lee NOT rude, witness coached by DEA, Lee very caring
- 82. 5-222-10 Lie, Detective Craig Baumart pulled over Lee for money, kept looking in car and asking for money
- 83. 5-228-2 Lie, Lee filmed corrupt DEA Agent looking for money in her car
- 84. 6-12-21 Lie, Joel Dunn DEA interview under duress, NOT free to leave
- 85. 6-13-6 Lie, Dunn had gun showing in Dr. Taylor's office
- 86. 6-14-12 Lie, Dr. Taylor DID limit business
- 87. 6-16-23 No positive urinalysis for illicit drugs, only cocaine and marijuana reliable
- 88. 6-17-15 Lie, Dr. Taylor did NOT talk to about Lee about money
- 89. 6-17-24 Lie about cash, Dr. Taylor DID take insurance
- 90. 6-19-24 Lie, Dr. Taylor NEVER said he had 10 drug seekers per day, Dunn said that
- 91. 6-20-20 Dr. Taylor DID use PMP but only on paper
- 92. 6-21-4 Dr. Taylor DID NOT admit to 10 drug seekers per day, a LIE
- 93. 6-21-8 Dr. Taylor did look for Red Flags, the DEA should have spoken on this, discharged over 200 patients
- 94. 6-30-9 Drug seekers NOT majority of patients, those were discharged, another LIE
- 95. 6-32-14 Dr. Taylor NOT free to leave when DEA in office, feared for life
- 96. 6-33-14 Dr. Taylor PRESSURED to sign DEA License away, Dunn would not leave until done
- 97. 6-39-32 Dr. Taylor's practice NOT entirely pain patients, probably 50%
- 98. 6-48-1 Dr. Taylor examined ALL patients, and ALL had pain.
- 99. 6-58-11 Dr. Taylor did NOT admit to 5 to 10 drug seekers per day, a repeated LIE
- 100. 6-67-17 DEA NOT benign at house, machine guns in Lee's face, made to sit many hours, no bathroom
- 101. 6-69-18 Medicine at home Dr. Taylor's personal medications, no patients at home
- 102. 6-71-16 Dr. Taylor NOT free to leave office when Dunn there, had guns
- 103. 6-72-15 Dr. Taylor was still employed at EMCare ERs, worked several times per month, LIE
- 104. 6-74-7 Dr. Taylor DID have insurance patients, NOT just cash patients; cash patients got free labs
- 105. 6-78-11 LIE, vehicles NOT from clinic money
- 106. 6-9-18 Search warrant on 2-9-2012, went to bank on 2-3-2012 without warrant, MAJOR LIE!
- 107. 6-91-14 Lee went to safety deposit box on 2-3-2012 at Attorney Kennedy's advice
- 108. 6-115-22 LIE, Dr. Taylor was also working at EMCare in ERs
- 109. 6-121-1 LIE, machine guns stuck in Lee's face, she was terrified
- 110. 6-122-3 LIE, Lee told she HAD to answer all questions, could NOT use the phone or bathroom, torture
- 111. 6-129-25 LIE about when DEA went to bank, it was 2-3-2012 without search warrant
- 112. 6-135-5 LIE, the DEA took two keys from Lee for her safety deposit box
- 113. 6-143-14 LIE, Dr. Taylor had other doctors helping, spent more time with patients
- 114. 6-145-21 LIE, Dr. Taylor had money before, could have retired, DEA after money
- 115. 6-146-21 Dr. Taylor NOT aware ANY patients reselling drugs, they would be discharged, over 200 discharged
- 116. 6-176-11 LIE, Dr. Munzing only looked at ADD charts, only 7 of 1150 to call Dr. Taylor a drug dealer
- 117. 6-178-19 Dr. Taylor examined ALL patients, more than other doctors Dr. Taylor saw
- 118. 6-184-21 LIE, typical work day NOT 91 patients, only once with 2 other doctors before vacation
- 119. 6-187-25 LIE, Dr. Taylor stopped Rick Bjorkman's ADD meds, sent to a psychiatrist, wife a drug addict
- 120. 6-218-14 Herkert liar, only 7 charts of 1150 examined, cherry picked
- 121. 6-228-18 LIE about Cornell Wallace, wrote what he recommended, fired him, could have retired in 2010
- 122. 6-237-12 LIE about assets, had \$100K in bank, Corvette purchased in 2008
- 123. 6-243-10 LIE, Lee sent money BACK to parents since she had gotten \$300 K from them
- 124. 6-259-2 LIE, Dr. Taylor had multiple physicians help him
- 125. 6-260-21 LIE, Dr. Taylor worked longer days before vacation

- 126. 6-262-1 Dr. Taylor saw 91 patients day before vacation with 2 other doctors, worked till ~9 PM
- 127. 6-263-1 LIE, Dr. Taylor spent time with patients, could be 6.1 minutes X 2 or 3 patients
- 128. 6-269-19 LIE, decrease numbers 25%, DEA came up with own numbers
- 129. 7-10-2 LIE, Dr. Taylor took insurance if patients had it
- 130. 7-11-1 LIE, Dr. Taylor discharged over 200 patients, thought ALL patients valid, at least 95%
- 131. 7-45-10 LIE, 91 patients one time before vacation, then decreased to less 30 per day
- 132. 7-62-1 LIE, Lee was NOT a registered nurse in Texas
- 133. 7-66-3 LIE, patients decreased, DEA stopped showing patients volume, lie of omission
- 134. 7-89-17 Dunn lied about seeing drug seeking patients, they would be discharged
- 135. 7-90-3 LIE, Dr. Taylor surrendered DEA number under duress and fear for life, Dunn a lying thug!
- 136. 7-96-6 LIE, money NOT illicit proceeds, examined all patients, free labs for cash patients, discharged >200
- 137. 7-96-6 LIE, NOT thousands of medical records in Plano, few discharged patient files since clinic moved
- 138. 7-96-6 LIE, NO conspiracy, Dr. Taylor did NOT need money, helped many people, Judge Crone a conspiracy
- 139. 7-98-1 LIE, NOT working at home, never saw patient there, accountant in Houston, Clinic Northern District
- 140. 7-99-17 LIE, Judge Crone said "I think there is a conspiracy." Biased, should be recused!
- 141. 7-102-18 LIE, did NOT need money, paid \$250 K cash for house... DEA wanted money!
- 142. 7-110-1 LIE, Alison Bjorkman wanted non-narcotic Seroquel stopped, she tried husband's and did not like
- 143. 7-110-9 LIE, pregnant woman NOT given controlled substances
- 144. 7-121-3 LIE, Leondra Johns assistant manager, did most of the work since Lee in Taiwan
- 144. 7-123-17 LIE, Dr. Taylor took insurances AND cash patients
- 145. 7-127-126 LIE, Dr. Taylor decreased patient volume to less than 30
- 146. 7-147-16 LIE, Pre-scripts written only before vacation for few law enforcement patients
- 147. 7-202-16 LIE, clinic money NOT for personal expenses
- 148. 7-213-23 LIE, 91 patients seen ONE DAY before vacation with two other doctors helping
- 149. 8-31-14 LIE, Dr. Taylor and Lee did NOT conspire, only wanted to help injured patients, had money
- 150. 8-53-23 LIE, Officer Craig Baumart pulled Lee over for money, mentioned money several times!
- 151. 8-71-8 LIE, Lee did NOT lie to DEA about drug prices... free labs included worth \$2,000 first visit

TAO U. TAYLOR  
CASE # 4:17-CR-9

26966-078 JANUARY  
2019

## JUDGE KENDALL ACCOMPLISHED AND I LIKE HIM, BUT THERE WAS "INEFFECTIVE COUNCIL" IN OUR CASE

1. Could have mentioned I inherited money in 2007 and did not need money in 2010 and 2011. This was the basis for our Conspiracy Indictment, and it was based on a lie. This was DEA and Stevan Buys' perjury, and this should have been confronted at the trial.
2. There was a policeman named Robert Hauk who claimed I used to drive an old Mini Van until we "Sold Drugs" in 2011 and then I bought a Corvette. This is a lie, first of all I never sold drugs, and secondly I purchased a used Corvette in 2007, and traded it on a different model in January 2008.
3. The DEA claimed that in 2011 and 2012 I had no other job besides our clinic which is a lie, I worked at EmCare in ERs on the weekends. This could have been confronted in court.
4. We had no character witnesses, I wanted some to show what a caring physician I am.
5. I wanted to have Professor Scott Fishman Testify, he is the top person in the world in pain management.
6. I wanted Detective Sandy Soule to work with us before the trial, and was talked out of this until about two weeks before the trial when it was too late.
7. Should have confronted Rick Bjorkman's ex-wife at the trial. I did not even know she was testifying. She was psychotic when she called/mailed our clinic, this should have been mentioned.
8. I never saw our discovery so was surprised on several witnesses and DEA lies.
9. Chia-Jean Lee's father in Taiwan sent her money to help build a clinic building in 2011, this should have been mentioned.
10. Did not mention our new patient fee of \$280 included blood work worth >\$600 in most physician's billing and >\$2,000 at the hospital, Other Prosecutor with bow tie a liar
11. Patients were treated for all diseases (DM, HTN, etc.), not just chronic pain.
12. Did not confront the DEA on the lie about patient volume, only one time did I see over 90 patients with help from other physicians, average less than 30
13. Did not confront DEA about the 200 patients discharged and over 600 of 1100 patients with multiple medical problems treated.
14. Did not mention we had 4 Dallas policeman, ex-DEA agents, ex-Sheriff's deputies, military patients, etc. with chronic pain. Also, 3 attorneys said our clinic operation was fine.
15. Did not mention Chia-Jean Lee being tortured on 2-2-2012 at our house, and did not report our house being trashed, a 4th Amendment violation.
16. Did not mention I was tortured on 2-2017, did not discuss the cuts on my ankles from the Plano Court house, I had pictures.
17. Did not discuss the 6th Amendment Violation of the case taking 7 years, a speedy trial violation.
18. Did not mention the case was based on vengeance because I wrote 150 letters in 2012 on how my wife was tortured and how the DEA was after money.
19. Did not mention how the fake patient "Nick Draper" said he had chronic pain on two intakes before he saw me, and this was in the chart. And Nick Briscoe was treated for HTN,

X2 -

Hyperlipidemia, smoking etc., not just pain.

20. Did not mention Texas Medical Boards, Maria Lopez, told me to keep practicing in ~7/2011; she was working with the DEA, this was entrapment.

21. Did not mention I was offered a "Deal" by the DEA in 2012 of one year in prison, later in 2013 two years in prison, and finally in 2017 5 years in prison which I refused since I did nothing wrong and I knew of all the DEA lies!

Ted W Taylor

22. At sentencing, asked if we owned a house, + then suggested a penalty at THE WORTH OF OUR HOUSE. He then offered "to be a pal" and sell our house if I gave him power of attorney.

Dr. Tad W. Taylor, MD, PhD  
#26966-078  
Seagoville FCI, PO Box 9000  
Seagoville, TX 75159-9000

Mr. Jacob Levitan  
Supreme Court of the United States  
Office of the Clerk, One 1st Street NE  
Washington, DC 20543-0001

SUBJECT: SUPREME COURT REPLY, CASE #21-7211 TAYLOR V. KENDALL LAW GROUP, ET AL.

June 2, 2022

Dear Mr. Levitan:

Thank you for your Supreme Court Letter dated May 19, 2022 (Case # 21-7211, Taylor v. Kendall Law Group, et al.) which I received yesterday, June 1, 2022. I am enclosing this letter along with a formal PETITION FOR REHEARING.

There are several things that Defense Attorney Joe Kendall should have done, he was lazy and unprofessional. I am only asking for Summary Judgement for this case to be heard by a jury, and they can decide if Kendall was negligent in my trial defense.

I had been "Offered" one year in prison in 2012, but I maintain my innocence. Because of Attorney Kendall's malpractice, I was given "De facto life in prison," 20 years in 2019 from my trial, Case #4:17-CR-00009. Some major issues, some not clarified in the lawsuit:

1. NO WITNESSES. Attorney Kendall kept saying "You do not need witnesses, you are the only witness." Some key witnesses for me would probably have changed the trial verdict such as:

Officer Jeremiah Byous, who my patient and was a Chief Narcotics Officer of the Dallas Police Department. He told me "Your clinic looks fine, I do not see any problems."

Officer Mitchell Bieker, from the Dallas Police Department, who was my chronic pain patient with multiple injuries. He thought my clinic was fine.

Officer Kathy Kuiper, retired sheriff deputy who said I was the best doctor she ever had. I got her onto Suboxone to control Opiate Addiction, and it also helped her pain. She wrote to the Texas Governor and the Texas Medical Boards and said i was the best doctor she ever had.

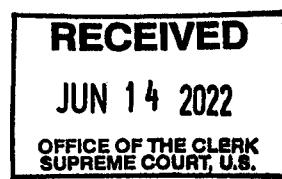
Detective Sandy Soule, who had worked on my case with Attorney Doug Mulder, who died in the 7 years it took to go to trial (Speedy Trial Violation). Detective Soule knew my case very well, and Attorney Kendall told me NOT to get him until 1 1/2 weeks before the trial, too late. Detective Soule did not think I was running a "Pill Mill."

Ex-Dallas Police Chief Dean David Pruitt who was my dean at Brightwood Medical College. He looked at my case, thought I did nothing wrong, and was willing to testify in my trial.

Attorney Mark Kennedy, who was our clinic attorney. He gave me advice to follow, which I did, and he said our clinic was fine.

Attorney Jennifer Saucedo, who took my case before the Texas Medical Boards, thought my clinic was fine, she saw several charts.

Two Texas Medical Boards Judges thought I did nothing wrong and said "This is very political now."



Professor Scott Fishman, former head of the Harvard University Chronic Pain Program, who I met at a conference on pain management. He could have testified for me. The two doctors the DOJ had were prostitutes, Dr. Owens does not even practice and he killed two people. And the other, Dr. Munzing, was paid over \$300,000 in 2017 for testifying against physicians. Professor Fishman is perhaps the top person in the world in pain management.

There were other character witnesses also, but these are the major ones. The law enforcement witnesses and attorneys would have made a huge impression, along with the top pain management expert in the world (Professor Fishman).

2. I never saw my Discovery, and Attorney Kendall NEVER discussed what witnesses were up next at our trial. Kendall did almost NO preparation, another Attorney Jeffrey Grass stated "Kendall is a shitty attorney."

3. Attorney Kendall NEVER mentioned that I had NO mens rea, no idea that I did anything wrong. I can show that on the average I saw about 7 chronic pain patients per day in 2010 and 2011 (I calculated this from the PSR). I had NO patient deaths nor overdoses. I discharged over 200 patients if I found they got medication from multiple doctors. We took both insurance and cash patients, and with cash patients I did FREE LABs (CMP, CBC, TSH, Lipid worth ~\$2,000 in the hospital) on the first visit, and I treated ALL medical conditions. All patients were examined, and NO prescriptions were written over prescribing guidelines.

4. The corrupt DOJ/DEA told 151 Felony Perjury Lies in my trial, and I kept telling Attorney Kendall this. He just ignored me and later said that I have ADD, an insult. Enclosed is the documented list of 151 Felony Perjury Lies that Kendall chose to ignore. My wife and I did not need money (we had inherited a lot) and Kendall refused to mention it; this was part of the Conspiracy. Also enclosed is a list of 22 Ineffective Assistance things Attorney Kendall failed to do in my trial.

5. My sentence of de facto life in prison was a violation of the Eighth Amendment, it was "Cruel and Unusual Punishment" to go from one year in 2012 to 20 years in 2019. The corrupt DOJ multiplied Adderall amounts by 20,000 (we had 21 ADD patients, most of which the Texas Medical Boards had looked at and said were fine). Since I had NO witnesses and the 2 fake physicians said I was a "Drug Dealer," the DOJ claimed ALL patients were fake. So less than 5kg of medication became about 80,000 pounds of drugs so the corrupt Prosecutor Buys could get a promotion. Attorney Kendall mentioned to me that the amounts were at least 1,000 times too high, but he never told the court this.

6. My wife, Ms. Chia-Jean Lee, had machine guns stuck in her face in 2/2012, and was made to sit over 4 hours, could NOT use the bathroom, could not call anyone, it was torture for her. And in 2/2017, I was almost shot and killed, almost "George Floyded," had my ankles cut in the Plano Court House, and we had to walk home over 5 miles with almost no clothes on and only bedroom slippers on a cold February day. Attorney Kendall knew this but chose to ignore it. And when we were finally arrested, we were NOT given our Miranda Rights. This is a constitutional violation of our rights, violation of the Fourth Amendment.

Finally, my wife, Ms. Chia-Jean Lee, has developed breast cancer since I first submitted this lawsuit to the Supreme Court. The cancer is a result of the stress she has had in prison. She was offered probation, but instead given 16 years in prison. I may never see her again, we have been married over 25 years. This is cruel and unusual punishment to go from a probation offer (mentioned in the trial transcripts) to 16 years where she may die because of the BOP's horrible medical care. Attorney Kendall can go home to his family, but because of his lazy malpractice, both my wife and I may die in prison. And I have a 21 year old special needs son with whom I spent time with every day. He is having a hard time, and appears depressed. Because of Kendall's negligence, I may never get to spend time with him again.

This case represents a true "David versus Goliath" situation. In true life, most of the time Goliath wins. I am an inmate at a federal prison, while Attorney Kendall was a judge before with his "Good Ole Boy Buddies" in the Northern District Court and 5th Circuit Court of Appeals. The Supreme Court has the brightest legal minds in the world. And I believe you stand against corruption and strive for justice, and stand with "The Little Guy."

I am only asking for this case to go to trial before a jury because of Attorney Kendall's lazy negligence and malpractice. This is not a complicated thing, and probably could be decided in less than one hour. But this is again a case of "David versus Goliath," and please let David win again! I pray you grant this case Certiorari.

I appreciate your help,

Gratefully, 

Dr. Tad W. Taylor, MD, PhD  
Yale Medical Graduate  
Former UTMB Galveston Adjunct Professor  
Former Brightwood Medical College Lecturer/Professor