

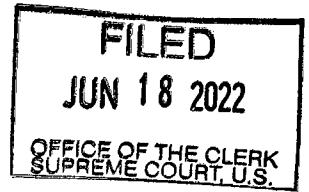
22-5392  
No. 22-

ORIGINAL

---

In The  
United States Supreme Court

---



Jane Doe,  
*Petitioner*

v.

City of Baton Rouge, et al.,  
*Respondent*

---

On Petition for a Writ of Certiorari  
to the United States Court of Appeals  
for the Fifth Circuit

---

**PETITION FOR A WRIT OF CERTIORARI**

---

Jane Doe  
3055 NW Yeon Ave.  
Portland, OR 97210  
qaidyl@pm.me  
(541)-556-9987

## **QUESTION PRESENTED**

Whether the federal court of appeals should be allowed:

- to disregard the US Supreme Court's law, the US Code, the Federal Rules, the Constitution, the Code of Conduct for federal judges;
- to deceive the public, including regarding the contents of the Petitioner's filings;
- to pervert the law, procedure, and all the facts – in order to "reach" a bogus, corruptly predetermined "ruling" and assist in crime cover ups.

## LIST OF PARTIES

The following are the respondents in the instant Petition:

Baton Rouge police department, James Weber, Charles Dotson, Stephen Murphy, Shanard Carey, John Windham, Murphy Paul, Caitlin Chugg, James Knipe, Todd Tyson, Brenden Craig, Ebony Cavalier, Lisa Freeman, Kimbra Brooks, Deelee Morris, Shona Stokes, Capital area family violence intervention center, Inc., Robert Hunt, East Baton Rouge parish, Hillar Moore, Melanie Fields, Lisa Woodruff-White, Jeffrey Landry, Patrick Magee, Roland Beaver, Kyle Poulichek, Brad Cranmer, Christopher Nakamoto, William Morvant, Shalimar Small, Daniel Nelson, Blake Booth, Katie Craft, Our Lady of the lake physician group.

- *Jane Doe v. City of Baton Rouge et al.*, 20-514, M. D. La.
- *Jane Doe v. City of Baton Rouge et al.*, 21-30061, CA5

## TABLE OF CONTENTS

QUESTION PRESENTED.....	2
LIST OF PARTIES.....	3
TABLE OF AUTHORITIES.....	5
OPINIONS BELOW .....	6
JURISDICTION.....	6
STATEMENT.....	6
REASONS FOR GRANTING THE WRIT .....	13
CONCLUSION.....	13
APPENDIX	
<i>Jane Doe v. City of Baton Rouge et al., 20-514, M. D. La.</i> .....	15
<i>Jane Doe v. City of Baton Rouge et al., 21-30061, CA</i> .....	19

## TABLE OF AUTHORITIES

### Cases

<i>Annis v. County of Westchester</i> , 136 F.3d 239, 246 (2d Cir. 1998).....	8
<i>Denton v. Hernandez</i> , 504 U.S. 25, 34 (1992).....	9, 10
<i>Ex parte Poresky</i> , 290 U.S. 30, 31-32 (1933).....	12
<i>Green v. Los Angeles County Superintendent of Schools</i> , 883 F.2d 1472, 1480 (9th Cir. 1989).....	12
<i>Hagans v. Lavine</i> , 415 U.S. 528, 536-38 (1974).....	9, 12, 13
<i>Lightfoot v. Union Carbide Corp.</i> , 110 F.3d 898, 907 (2d Cir. 1997).....	12
<i>Neitzke v. Williams</i> , 490 U.S. 319, 320 (1989) .....	10
<i>Olivas v. Nevada, ex rel. Dep't of Corr.</i> , 856 F.3d 1281, 1284 (9th Cir. 2017).....	8
<i>Rippo v. Baker</i> , 137 S. Ct. 905, 907 (2017) .....	11
<i>White v. Bloom</i> , 621 F.2d 276, 280-81 (8th Cir. 1980).....	11
<i>Williams v. Pennsylvania</i> , 579 U.S. —, —, 136 S.Ct. 1899, 1905, 195 L.Ed.2d 132 (2016) .....	11
<i>Western Center for Journalism v. Cederquist</i> , 235 F.3d 1153, 1157 (9th Cir. 2000).....	12

### Statutes

28 U.S.C. §1254(1).....	6
-------------------------	---

### Rules

Fed R Civ Pro 41.....	8
Fed R App Pro 10.....	9

### Other Authorities

Code of Conduct for US judges. ....	passim
-------------------------------------	--------

## **JURISDICTION**

The Fifth Circuit entered “judgment” on March 24, 2022. The US Supreme Court has jurisdiction under 28 U.S.C. §1254(1).

## **OPINIONS BELOW**

The opinions of the appellate court and the district court are unpublished falsifications, which have nothing to do with the Petitioner’s legal action and the existing law.

## **STATEMENT**

This case stems from a multiyear abuse of the Petitioner by the corrupt courts which, while aiding criminal “law enforcement,” state “courts,” and other criminals, have been maliciously and criminally barricading Petitioner’s meaningful access to courts.

The criminals, disguised as the “law” have been working in tandem to assist in crime cover ups, falsify records and documents, protect themselves and those they favor from any criminal and civil liability, and deprive Petitioner of any constitutional rights, in part due to her national origin and gender.

Petitioner has been trying to meaningfully access the courts for years but the filthy and corrupt “courts” have been maliciously and criminally blocking that access. For the first time ever in the Petitioner’s life, she attempted to access the federal court in 2019 when started being persecuted by the dirty cops and other criminals-in-law that decided to cover up the violent crime, committed against the Petitioner and entirely falsified the “criminal investigation.” Once Petitioner protested the unlawful discrimination and deprivation of her rights by the criminals-in-law, and stated that she will try to expose their corruption and “the criminals who run Baton Rouge police department and Louisiana department of ‘justice’,” those criminals had immediately taken control over all Petitioner’s online communication, deactivating her email accounts, all social media accounts, removing Petitioner’s publications from her blog, and otherwise criminally silencing Petitioner and preventing her from exercising her First Amendment rights and speaking about their crimes and atrocities.

At the same time, the criminals under the guise of the “law” and “law enforcement” attacked Petitioner and injected her eyelids with some corrosive substance that partially dissolved them. Petitioner was immediately unlawfully and secretly “discharged” from her employment in Louisiana state university, was no longer able to work from home due to constant malicious interferences by the defendants, and had no longer a safe place to live due to the same criminal persecution by the defendants.

Petitioner has taken numerous steps to secure access to courts to obtain any justice and damages for the crimes, committed against her and her Family but for over four years has been unable to even meaningfully enter the courtroom due to malicious and criminal suppression of all her actions – in direct violation of all existing laws – by the filthy “courts.”

Shortly after stating that she will try to expose the corruption of the criminals, Petitioner and her Family had been criminally subjected to the prolonged attacks by the chemical weapons that induced – in ALL THREE PREVIOUSLY HEALTHY individuals who have been attacked – systemic injuries and cancers of the same etymology. When Petitioner was being attacked with chemical weapons and toxins, she was diligently filing numerous reports with appropriate “authorities” and tried for several months to access “courts” and have the hearing on her petition for injunctive relief. Although said hearing should have taken place no later than in 10 days in accordance with the relevant law, the filthy foul criminals had been denying that access to courts for over four months and although Petitioner was appearing repeatedly together with the five subpoenaed witnesses, the hearing never took place.

To further cover up their atrocities, the filthy criminals have been preventing Petitioner and her Family from obtaining medical help by conspiring – not for the first time – with corrupt private actors to deny access to medial procedures and treatments, to falsify records, to deceive Petitioner, and then to criminally steal the organs that were surgically removed and were scheduled to be studied histologically. The foul criminals did that in their rabid attempts to destroy evidence that ALL THREE PREVIOUSLY HEALTHY individuals whom they had been attacking with chemical weapons were induced the same systemic and devastating diseases as a direct result of their vicious and criminal attacks with chemical weapons.

While suffering all those horrific events, Petitioner at all times have been trying to access federal court but access to the courtroom had been maliciously barricaded to Petitioner.

When attempting to access federal court for the first time in her entire life in 2019 when the persecution by the criminals has just ensued, corrupt middle district of Louisiana artificially suppressed the Petitioner's legal action. Petitioner's application to proceed in forma pauperis was NEVER ruled on. After waiting for several months, Petitioner realized that access to courts had been denied to her, and filed a "Motion to Dismiss Without Prejudice" under Federal Rules of Civil Procedure 41(a)(1). The corrupt middle district of Louisiana, as a result of the malicious and criminal conspiratorial agreement with the defendants with whom it has intimate relationships, unlawfully and in direct violation of the Federal Rules and the precedents momentarily "granted" the motion, dismissing the legal action with prejudice.

Petitioner was unable to refile her action, as she planned and indicated in her Motion, and had to wait for nearly a year until the Fifth Circuit reversed<sup>1</sup> the middle district of Louisiana.

Thereafter, when Petitioner refiled her action, malicious middle district of Louisiana, while criminally conniving and plotting with the defendants to cover up the crimes, committed against the Petitioner and protect the ones it favors from any criminal and civil liability, continued unlawfully blocking Petitioner's access to courts. It fixed to "screen" the Petitioner's oversaturated with the detailed factual allegations and assertions of the ghastly violations of her constitutional rights under the prisoner in forma pauperis statute.

To carry out its unlawful dealings and falsifications, it refused to accept the payment of the filings fee from Petitioner and kept returning Petitioner's cashier checks, accompanied by its deceitful and fraudulent letters.

Although umbilically connected with the defendants, openly advocating for the defendants, and working as their "counsel," it maliciously refused to disqualify itself. It lied to the public in its deceitful, fraudulently manufactured "opinions" that it was never reversed by the Fifth Circuit and that it decided to "reverse" itself and "voluntarily granted" Petitioner's appeal that was filed with the Fifth Circuit.

---

<sup>1</sup> *Jane Doe v. City of Baton Rouge*, 19-30277, CA5.

It manufactured disgustingly corrupt falsifications in which it perverted all the facts of the Petitioner's complaint, criminally misapplied and misused the law to simulate the proceedings and deceive the public, and perverted the procedure.

It falsely and unlawfully mislabeled the Petitioner's meritorious complaint that presented serious questions of constitutional dimension and well-pleaded, meritorious factual allegations many of which were substantiated by the deposition transcripts, public records, audio and video recordings, and other means that were referenced in the complaint, as "frivolous" and for the second time corruptly and maliciously threw it out.

Petitioner immediately appealed to the Fifth Circuit. Petitioner timely filed an order for the transcript preparation and designated the record on appeal. The transcript, in direct violation of Fed. R. App. P. 10 was deleted from the record on appeal. Petitioner requested that the Fifth Circuit order middle district of Louisiana to re-add the transcript so that she could "urge on appeal that findings and conclusions [of middle district of Louisiana are] unsupported by the evidence and contrary to the evidence," *Id.* The Fifth Circuit, assisting in the atrocities and lies that have been perpetuated by middle district of Louisiana, denied the Petitioner's request.

In her 55-page appellant brief, Petitioner carefully and responsibly briefed and over-briefed all the matters that concerned that appeal.

While linking all her statements to the record on appeal as Petitioner filed all necessary exhibits in the district court record and timely filed her objections with that district court and raised all necessary arguments, Petitioner demonstrated that her legal action has been corruptly and maliciously mishandled and all the proceedings had been simulated.

While analyzing in detail the US Supreme Court's law such as *Hagans v. Lavine*, 415 U.S. 528, 536-38 (1974), *Neitzke v. Williams*, 490 U.S. 319, 320 (1989), *Denton v. Hernandez*, 504 U.S. 25, 34 (1992), and other precedents, Petitioner convincingly demonstrated that her legal action has been criminally mishandled, all the facts perverted, and all the laws misapplied and misused in order to simulate the proper proceedings and purport to "reach" a 100% predetermined, corrupt "ruling."

Petitioner showed that even if it were proper to "screen" the complaint of a civilian under the prisoner in forma pauperis statute which contradicts the entire section 1915 in which the word "prisoner" is repeated at least 21 times and which

the federal circuits found to be an error, see *Olivas v. Nevada, ex rel. Dep't of Corr.*, 856 F.3d 1281, 1284 (9th Cir. 2017), the US Supreme Court's precedents unequivocally demonstrate that only when the facts alleged rise to the level of the irrational or the wholly incredible" [a finding of] factual frivolousness" could be made under section 1915, *Denton v. Hernandez*, 504 U.S. 25, 34 (1992). That is, under no circumstances the Petitioner's meritorious complaint could be lawfully dismissed even under the loose standards of section 1915, see *Id.*

The corrupt and malicious middle district of Louisiana, in violation of all rules, commons sense, and even traces of decency REFUSED to accept payment of the filing fee from Petitioner so that it can corruptly misuse and abuse an improper procedure as its corrupt simulation of the proceedings has been 100% criminally predetermined and has no basis in applicable law or facts, described in the Petitioner's complaint.

In her appellant brief, filed with the Fifth Circuit, Petitioner aptly demonstrated that, based on the US Supreme Court law, her meritorious action could not possibly be dismissed under either procedure (be it even "screening" under section 1915):

"Under § 1915(d)'s frivolousness standard...dismissal is proper only if the legal theory...or the factual contentions lack an arguable basis...Where a complaint raises an arguable question of law...dismissal on the basis of frivolousness is not [appropriate]." *Neitzke v. Williams*, 490 U.S. 319, 320 (1989).

The atrociously corrupt and foul "judges" of middle district of Louisiana, while assisting their friends and family members, sued in the Petitioner's complaint, shamefully and fraudulently "labeled" Petitioner's meritorious, based on factual evidence and documents complaint. In her 55-page appellant brief, Petitioner demonstrated, in detail, by analyzing and quoting the US Supreme Court's law as well as findings of the federal circuits that the corrupt judges have "applied" the very wrong standard in order to "reach" their corrupt, predetermined result. In other words, they simply outrageously lied and perverted the law, the facts, and the procedure, which Petitioner has aptly and fully demonstrated in her brief.

Petitioner also showed that the middle district of Louisiana has intentionally violated the US Supreme Court's law and other precedents when refused to disqualify itself while being umbilically connected to the defendants, openly having the defendants' best interest in mind, openly advocating for the defendants, and being business partners with certain defendants. Petitioner cited various US Supreme Court's precedents and convincingly demonstrated in her appellant brief

that she is entitled to have the middle district of Louisiana judges, symbiotically connected to defendants, removed, and that it's a ghastly violation of the law and the code of judicial conduct to disregard the Petitioner's request, as the Fifth Circuit has done.

"The Court asks not whether a judge harbors an actual, subjective bias, but instead whether, as an objective matter, the average judge in his position is likely to be neutral, or whether there is an unconstitutional potential for bias" (internal quotation marks omitted)). Our decision in *Bracy* is not to the contrary: Although we explained that the petitioner there *had* pointed to facts suggesting actual, subjective bias, we did not hold that a litigant must show as a matter of course that a judge was "actually biased in [the litigant's] case," *Rippo v. Baker*, 137 S. Ct. 905, 907 (2017) (citing *Williams v. Pennsylvania*, 579 U.S. —, —, 136 S.Ct. 1899, 1905, 195 L.Ed.2d 132 (2016)).

Because the corrupt middle district of Louisiana, while maliciously and criminally suppressing the Petitioner's actions, had the gall to falsely claim that Petitioner's claims "prescribed," Petitioner, in her well-presented 55-page detailed brief carefully demonstrated that the statute of limitations has not started running yet as **the malfeasance of the defendants and criminal acts, directed at Petitioner have never stopped**, that various actions, timely and properly initiated in various courts on the same claims has interrupted and tolled prescription, and that statute of limitations has been further tolled by legal impediments, created by corrupt courts and corrupt defendants that have been obstructing courts and barricading Petitioner's access to courts.

A conspiracy to violate civil rights is a continuing violation that accrues for limitations purposes upon the final act in furtherance of the conspiracy, *White v. Bloom*, 621 F.2d 276, 280-81 (8th Cir. 1980).

"The continuing-violation exception 'extends the limitations period for all claims of discriminatory acts committed under [an ongoing policy of discrimination] even if those acts, standing alone, would have been barred by the statute of limitations,' *Lightfoot v. Union Carbide Corp.*, 110 F.3d 898, 907 (2d Cir. 1997)," *Annis v. County of Westchester*, 136 F.3d 239, 246 (2d Cir. 1998).

"For a continuing violation to be established, a plaintiff must show "a series of related acts, one or more of which falls within the limitations period, or the maintenance of a discriminatory system both before and during the

limitations period." *Green v. Los Angeles County Superintendent of Schools*, 883 F.2d 1472, 1480 (9th Cir. 1989)." *Western Center for Journalism v. Cederquist*, 235 F.3d 1153, 1157 (9th Cir. 2000).

The US Supreme Court has found that

"[I]n the absence of diversity of citizenship, it is essential to jurisdiction that a substantial federal question should be presented." *Hagans v. Lavine*, 415 U.S. 528, 536-38 (1974) (citing *Ex parte Poresky*, 290 U.S. 30, 31-32 (1933)).

In her 55-page appellant brief, Petitioner demonstrated that not only her legal action was anything but "frivolous" and her complaint is replete and bursting with the well-pleaded factual allegations of the ghastly constitutional violations, but there was also full diversity of citizenship which has been shown in the complaint and which Petitioner personally asserted orally at that sham-hearing during which middle district of Louisiana purported to be screening the Petitioner's complaint. As has been stated above, the transcript had been maliously and in direct violation of the law deleted from the record.

It is clear, per *Hagans v. Lavine*, 415 U.S. 528, 536-38 (1974) and other US Supreme Court's precedents that the Petitioner's complaint could not be dismissed as "frivolous" even if it were not presenting any substantial federal questions (in reality, it has presented several distinct substantial constitutional questions) because there is full diversity of citizenship present. Petitioner meticulously and carefully demonstrated it in her appellant brief which she filed with the Fifth Circuit.

First, the Fifth Circuit hid the Petitioner's appellant brief and record excerpts from the public – when a member of the public clicks on the brief on the Fifth Circuit's docket and tries to view it and/or purchase access, the pop-up window appears, advising that the member of the public has no right to view the judicial public record.

Thereafter, the Fifth Circuit manufactured a deceitful, unlawful "opinion," in which it falsely and baselessly claimed that Petitioner failed to present any "non-frivolous argument." It maliciously ignored all extremely important Petitioner's arguments and analysis of the US Supreme Court's law and other law. After hiding the actual Petitioner's brief from the public, it proceeded shamelessly deceiving the public.

In order to “reach” its corrupt, criminal, and 100% predetermined phony “ruling,” it lied to the public that all that meaningful, well-thought-out argument and analysis of the relevant law and the record on appeal which is the result of the Petitioner studying the relevant law closely for the last few years and the result of extraordinary dedicated to the truth and justice hard work and perseverance, were “not even there.”

Maliciously and while assisting in crimes and crime cover ups, it manufactured 2 pages of empty shameful generalizations that have absolutely nothing to do with the Petitioner’s legal action, record on appeal, or concise, relevant, and directly on point argument that she has presented.

There is not a single word or phrase in that “opinion,” attached as Appendix, that is applicable to the Petitioner’s action or her carefully prepared and argued brief. Deceitful Fifth Circuit has fully joined the “powerful” defendants and the lower courts in their atrocities, criminal violations of the law, persecution of Petitioner, and perpetuation of falsifications and lies. The attached opinion is nothing else but a corrupt falsification, manufactured as a manifestation of abuse by the corrupt public officials. Similarly, the district court’s “opinion,” also attached as Appendix, is a criminal, deceitful falsification that shamefully perverted the law, facts, and the Supreme Court’s precedents. It has been fabricated in order to abuse Petitioner, assists criminals, sued in the Petitioner’s action, and maliciously deny access to courts to Petitioner.

## **REASONS FOR GRANTING THE WRIT**

The Fifth Circuit has so far departed from the accepted and usual course of judicial proceedings, and approved atrocities, committed by middle district of Louisiana as to call for an exercise of the US Supreme Court’s supervisory power.

## **CONCLUSION**

The US Supreme Court should grant this writ and summarily reverse the Fifth Circuit, remanding the matter to it with instructions to follow the law and the Supreme Court’s precedents, and adjudicate the Petitioner’s appeal on the merits and impartially consider all the important arguments, carefully briefed in the Petitioner’s appellant brief, which concerns unconstitutionality of handling the Petitioner’s legal action by middle district of Louisiana, gross and ghastly

perversions of the law, facts, and procedure, the multiyear denial of meaningful access to the courts to Petitioner, and corrupt simulation of the proceedings.

RESPECTFULLY SUBMITTED BY:

Jane Doe



3055 NW Yeon Ave.  
Portland, OR 97210  
qaidyl@pm.me  
(541)-556-9987