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No. \_\_\_\_\_

Supreme Court, U.S. FILED JAN 11 2022 OFFICE OF THE CLERK
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IN THE  
**SUPREME COURT OF THE UNITED STATES**

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ALLA ZORIKOVA — PETITIONER  
VS.  
JULIE PYLE, VEGAS SHEPHERD RESCUE, TAMMY WILLET  
— RESPONDENT(S)

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**ON PETITION FOR A WRIT OF CERTIORARI TO**

**NEVADA COURT OF APPEALS**

**PETITION FOR WRIT OF CERTIORARI**

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SUPREME COURT, U.S.

## **I. QUESTION(S) PRESENTED**

1. Whether Alla Zorikova was denied her constitutional right to due process and fair trial in the court.
2. Whether the Court egregiously erred in finding that Zorikova's Complaint must be dismissed with prejudice even it was not decided on merits.
3. Whether the Court erred in finding that Zorikova violated District Court's orders.
4. Whether the Court erred in finding that Zorikova provided false statements to the Court despite absolute absence neither written by Court list of "those statements", nor any supporting Court's "findings" of evidence of "falsity" otherwise.
5. Whether the Court erred in finding that District Court did not abuse it's power.
6. Whether the Court erred in finding that District Court was right in its failure to remove Judge Eric Johnson from this case or that Judge Johnson was right in deciding not to recuse himself as law required him.
7. Zorikova's Complaint has clear and strong merits and must be decided via trial on merits.

## II. LIST OF PARTIES

[X] All parties appear in the caption of the case on the cover page.

1. ALLA ZORIKOVA, Plaintiff, Apellant
2. JULIE PYLE, Defendant, Respondent
3. VEGAS SHEPHERD RESCUE, Defendant, Respondent
4. TAMMY WILLET, Defendant, Respondent

[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:

1. CASEY GISH, counsel for Defendants and the person who included himself in judgment while he NEVER was a party for this case.

## III. RELATED CASES

none

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## **STATUTES AND RULES**

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*I See Act of June 27, 1988, Pub. L. No. 100-352, 102 Stat. 662 (1988)....* ↗

*Rule 10....*

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 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,

[X] 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,

[ X] is unpublished.

## **JURISDICTION**

[ ] For cases from federal courts:

The date on which the United States Court of Appeals decided my case was .

[ ] 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)

[ X] 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 .

[X] A timely petition for rehearing was denied by the United States Court of Appeals on the following date: October 20, 2022, 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) The Supreme Court’s jurisdiction is largely controlled by Congress. Under Article III of the Constitution, the Court has original jurisdiction over a small class of cases—those “affecting Ambassadors, other public Ministers and Consuls, and those in which a State shall be Party.” U.S. Const. art III, § 2, cl. 2. All other authority must be conferred by statute: Article III provides that in non-original cases that fall within the judicial power, the Court “shall have appellate Jurisdiction, both as to Law and Fact, with such Exceptions, and under such Regulations as the Congress shall make.” Id. Since 1988, when Congress did away with the bulk of cases within the Court’s mandatory appellate jurisdiction,<sup>1</sup> the Court has enjoyed virtually plenary discretion to set its own agenda by determining whether to grant or deny certiorari. With the exception of small remaining categories of mandatory jurisdiction—notably for cases involving redistricting and other cases required to be heard by a threejudge district court—the Court’s docket is composed of cases of its choosing.

*1 See Act of June 27, 1988, Pub. L. No. 100-352, 102 Stat. 662 (1988). The arc of the Court’s jurisdiction is traced in, among other sources, Carolyn Shapiro, *Docket Control, Mandatory Jurisdiction, and the Supreme Court’s Failure in *Rucho v. Common Cause**, 2020 Wis. L. Rev. 301, 303-306 (2020) (describing the Court’s efforts to win congressional support to reduce its mandatory appellate jurisdiction and expand its discretionary jurisdiction).*

## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

Article III, Section 2, Clause 1:

“The judicial power shall extend to all Cases, in law and equity” *Warth v Seldin*, 422 U.S. 490,498 (1975)(“In essence the question of standing is whether the litigant is entitled to have the court decide merits of the dispute”); *Black’s Law Dictionary* 1536 (defining “standing” as “a party’s right to make a legal claim or seek judicial enforcement of a duty or right”).

NRS 41.580, 207.200, 41.515

### **STATEMENT OF THE CASE**

Plaintiff/Appellant/Petitioner Zorikova filed her complaint against alleged thieves of her top german shepherds and trespassers of her private property.

Sheriffs on the search warrants searched Defendants houses and later Defendants and Casey Dillan Gish (an attorney of Defendant in this case and NOT a Defendant, nor party of this case) admitted to detectives that he was in possession of Zorikova’s dogs, knew where the dogs are, but will not neither return the dogs, nor he will disclose to authorities whereabouts of stolen dogs.

Animal Control of San Bernardino County, Zorikova, her attorneys and sheriff demanded Gish and his clients to return stolen dogs to Alla Zorikova, but he and Defendants refused to return the dogs. Gish, on behalf of searched by sheriff entities and persons, instead sued detectives in state and federal courts of

California; however, recently all Gish's complaints against County were dismissed with prejudice.

As a bogus attempt for his defense and defense of his clients, Gish conspired with arrested multiple times activist/attorney Bryan Pease to create a smear campaign on Alla Zorikova.

[\*\*https://www.activistfacts.com/3247-bryan-pease/\*\*](https://www.activistfacts.com/3247-bryan-pease/)

Zorikova sues Pease for defamation in San Diego Superior Court and won intermediate action for causes defamation and libel against Pease. Part of that smear campaign is GISH's FALSE statements to this Court and other Courts in California and Nevada.

In this case Court of Appeal erred in affirming dismissal with prejudice of Zorikova's Complaint and affirming insertion afterwards of Gish (by Gish himself) after the judgement of dismissal has been issued. The case has absolute and strong merits and must be decided on merits. Why thieves of Zorikova's dogs shall be left without being hold accountable for wrongdoing?

Further, Zorikova filed Affidavit of Prejudice based on the facts that presiding on case Judge Eric Johnson was previously twice investigated for corruption with connection to Las Vegas Strip Club,

[\*\*https://www.veteransinpolitics.org/2016/09/eric-johnson-perjured-judicial-appointment-clark-county-district-court-bench/\*\*](https://www.veteransinpolitics.org/2016/09/eric-johnson-perjured-judicial-appointment-clark-county-district-court-bench/)

failed to disclose this fact to the Court on his application for judge's sit and clearly flirted with a female and Animal rights Activist Shana Weir, who was newly brought into this case by Defendant's Counsel Gish and possibly was connected to that "Las Vegas Strip Club" investigation in the past. Endorsed and paid by Animal Rights Activists Judge Johnson refused to recuse himself.

Court of Appeal erred in finding that District Court correctly sanctioned Zorikova for "violating Court's orders", despite citing irrelevant cases in support. While in reality, there was not a single order in this case that Zorikova "violated". Zorikova timely paid her out state Plaintiff bond fees, there were NO other orders. There was not a single evidence presented to the Court confirming erroneous finding that Zorikova provided "false statements". Moreover, as stolen dogs investigation was developing, there are multiple police/deputies declarations available to public now confirming that Zorikova's service was indeed done by Olivia Jeong in Las Vegas, Nevada, and Defendant's of other related Zorikova's cases multiple times saw Olivia Jeong serving papers. Casey Gish provided outrageous, false statements to the Court, which Zorikova disputed via multiple motions and via clear and convincing evidence. However, Courts failed to act and to submit to State Bar evidence of undisputable falsity to the Courts by thieve, conspirator and attorney in one - Casey Gish.

Zorikova is ProSe and is shocked by opened to public view Nevada Judges disregard of people's constitutional rights, while lying attorney files with Courts clearly and in a face false statements without being hold accountable. Plaintiff has rights and merits to sue Defendants listed in this lawsuit.

Court of Appeal failed to list a single relevant case where dismissal with prejudice would be justified if case is NOT decided on merits. All listed by Court of Appeal/Supreme Court cases were misapplied.

Appellant/Plaintiff is prejudiced if she would be denied her inevitable right for fair trial and if thieves of her dogs would be left without paying damages to Plaintiff.

Furthermore, there is NO remedy left for Plaintiff to dispute false allegations by Judge Johnson for alleged "Plaintiff's false statements". Only if this case reversed, Plaintiff can address that false allegations against her.

Defendants/Respondents failed to respond on Appellant's Brief at the Court of Appeal and only because of this Respondent's negligence, Court of Appeal had to reverse District court's Judgment.

## **REASONS FOR GRANTING THE PETITION**

The decision of a lower court is brutally erroneous and has national importance because People has to trust to Courts and into ability to receive justice through fair

judicial system. There are plenty of countries where People deprived from accessing fair justice system and USA shall still be that exception, where corrupted judges and knowingly falsifying facts attorneys be hold accountable.

Public needs to restore trust in Courts.

In this case lower court simply came up with fantasized and baseless acquisitions of “Plaintiff falsifying facts” yet without a single supporting these acquisitions evidence.

There are also legally important issues that are of great importance to the conduct of litigation.

Legal and factual errors by lower court need be corrected.

This Petition for Review asks this Court to grant review under NRAP 40B to vacate the Court of Appeals’ opinion issued in this case.

Court of Appeal failed to reference in their affirming decision a single case or statute that would support it’s affirming decision in finding that Complaint can be dismissed with prejudice if NO Court order, nor discovery rules has been violated by Plaintiff. Furthermore, Court of Appeal failed to support it’s finding with a single evidence of “falsity” in Zorikova’s statements. By this point District Court and Court of Appeal provides bare word “falsity” in their reference without a

single statement of example of that “falsity”, nor single evidence “found” of that “falsity”, which is clearly abuse of power by Courts.

Court of Appeal unjustly affirmed after the fact “insertion from nowhere” of Casey Gish (acting as an attorney in this case) into judgment as a “Defendant” without being summoned, served, nor named as a defendant in complaint.

If left affirmed, the wrong judgement by District Court will crate wrong and unfair for public precedent against statutory and common law of State of Nevada.

Accordingly, the issues before this Court affect the rights of a thousands of Americans throughout this state and will continue to do so for the foreseeable future absent intervention by this Court.

## **CONCLUSION**

The petition for a writ of certiorari should be granted via summary reversal or petition review.

Respectfully submitted,



Date 01/10/23

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**PROOF OF SERVICE**

I, Olivia Jeong, do swear or declare that on this date, 01/11/2023 , as required by Supreme Court Rule 29 I have served the enclosed MOTION FOR LEAVE TO PROCEED IN FORMA PAUPERIS and PETITION FOR A WRIT OF CERTIORARI on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days. The names and addresses of those served are as follows: I declare under penalty of perjury that the foregoing is true and correct. Executed on , 01/11/2023

By Olivia Jeong



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