

22-961

No. _____

In the
Supreme Court of the United States

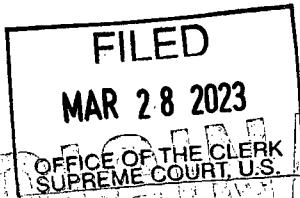
DEAN ALLEN STEEVES,

Petitioner,

v.

UNITED STATES,

Respondent.



ORIGINAL

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

PETITION FOR A WRIT OF CERTIORARI

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MARCH 29, 2023

SUPREME COURT PRESS

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BOSTON, MASSACHUSETTS

QUESTIONS PRESENTED

1. Whether Congresses' Mandatory Exceptions, found in Public Law 91-172 at 508(c)(1)(A), 83 Stat 494-495 & 6033(a)(2)A(i), 83 Stat 519-520 for "*churches, their integrated auxiliaries*", from compliance with Congresses' Special Rules With Respect to 501(c)(3) Organizations means that "*churches, their integrated auxiliaries*" are mandatorily excepted from Federal income/excise-tax liability.

2. Whether the U.S. lower Courts' unlawful trespass upon a private relationship between a non-State organized private "*church*" and its "*integrated auxiliary*", via the lower Courts' arbitrary denial of the private relationship's existence, is judicial misconduct by the U.S. lower Courts?

3. Whether a Federal income/excise-tax liability can be imposed when there is no commercial activity involving Congresses' list of specific goods/commodities Congress has determined to be subject to its Federal income/excise tax?

4. Whether human labor can be included in Congresses' list of goods/commodities subject to Congresses' Federal income/excise tax when 15 U.S.C. § 17, 38 Stat 731 (1914) states human labor cannot be a commodity/article of commerce?

5. Whether unlawful imposition of a Federal income/excise-tax liability is "peonage" in violation of the Revised Statutes at Large of 1874 & 1878, sections 1990 & 5526 as well as the pre-December 1, 1873 self-authenticating competent evidence of the laws of the United States in all Courts of the United States regarding "peonage", legislated at 14 Stat 546 (1867)?

PARTIES TO THE PROCEEDINGS

Petitioner

- Petitioner DEAN ALLEN STEEVES was the Plaintiff in the United States Court of Claims and the Plaintiff-Appellant in the United States Court of Appeals For The Federal Circuit.

Respondent

- The UNITED STATES was the Defendant in the United States Court of Federal Claims and the Defendant-Appellee in the United States Court of Appeals for the Federal Circuit.

LIST OF PROCEEDINGS

United States Court of Appeals for the Federal Circuit

No. 2022-1079

Dean Allen Steeves, *Petitioner-Appellant* v.

UNITED STATES, *Defendant-Appellee*

Date of Final Opinion: July 21, 2022

Date of Rehearing Denial: November 2, 2022

United States Court of Federal Claims

No. 1:19-cv-01905

Dean Allen Steeves, *Plaintiff* v. UNITED STATES

Date of Final Order: September 7, 2021

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PETITION FOR A WRIT OF CERTIORARI

Petitioner, Dean Allen Steeves, respectfully petitions for a Writ of Certiorari to review the judgment of the United States Court for the Federal Circuit in this case.



OPINIONS BELOW

The Opinion of the United States Court of Appeals for the Federal Circuit was issued on July 21, 2022. (App.1a)

The Final Order of the United States Court of Federal Claims was issued on September 7, 2021 (App.9a)

The Opinion and Final Order were not designated for publication.



JURISDICTION

The judgment of the United States Court of Appeals for the Federal Circuit was entered on September 7, 2022. Petitioner timely filed for a Panel Rehearing, which was denied on November 2, 2022. (App.36a) On January 3, 2023 Chief Justice John G. Roberts Jr. extended the time to file a Petition for Writ of Certiorari to April 1, 2023. (Sup. Ct. No. 22A592) Petitioner invokes this Court's jurisdiction under 28 U.S.C. § 1254(1), 62 Stat 928.



CONSTITUTIONAL PROVISIONS, STATUTES AND REGULATIONS INVOLVED

A. Constitutional Provisions

U.S. Const. amend. V

No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the militia, when in actual service in time of War or public danger; nor shall any person be subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, *nor be deprived of life, liberty, or property, without due process of law*; nor shall private property be taken for public use, without just compensation.

U.S. Const. amend XVI

The Congress shall have power to lay and collect taxes on incomes, from whatever source derived, without apportionment among the several States, and without regard to any census or enumeration.

B. Statutory Provisions

28 U.S.C. § 2201(a), 62 Stat 964

In a case of actual controversy within its jurisdiction, except with respect to Federal taxes other than actions brought under section 7428 of the Internal Revenue Code of 1986, a proceeding under section 505 or 1146 of title 11, or in any

civil action involving an antidumping or countervailing duty proceeding regarding a class or kind of merchandise of a free trade area country (as defined in section 516A(f)(9) of the Tariff Act of 1930), as determined by the administering authority, any court of the United States, upon the filing of an appropriate pleading, may declare the rights and other legal relations of any interested party seeking such declaration, whether or not further relief is or could be sought. Any such declaration shall have the force and effect of a final judgment or decree and shall be reviewable as such.

28 U.S.C. § 2072(b), 62 Stat 961

Such rules shall not bridge, enlarge or modify any substantive right. All laws in conflict with such rules shall be of no further force or effect after such rules have taken effect.

26 U.S.C. § 508(c)(1)(A), 83 Stat 494-495

(c) Exceptions

(1) Mandatory Exceptions—Subsections (a) and (b) shall not apply to—

(A) churches, their integrated auxiliaries, and conventions or associations of churches, or

26 U.S.C. § 6033(a)(2)(A)(i), 83 Stat 519-520

(a) Organizations Required To File

(2) Exceptions from filing

(A) Mandatory Exceptions—Paragraph (1) shall not apply to—

- (i) churches, their integrated auxiliaries, and conventions or associations of churches.

15 U.S.C. § 17, 38 Stat 731, Sec. 6.

That the labor of a human being is not a commodity or article of commerce

26 U.S.C. § 501(c)(3), 68A Stat 163

Corporations, and any community chest, fund, or foundation, organized and operated exclusively for religious, charitable, scientific, testing for public safety, literary, or educational purposes, or to foster national or international amateur sports competition (but only if no part of its activities involve the provision of athletic facilities or equipment), or for the prevention of cruelty to children or animals, no part of the net earnings of which inures to the benefit of any private shareholder or individual, no substantial part of the activities of which is carrying on propaganda, or otherwise attempting, to influence legislation (except as otherwise provided in subsection (h)), and which does not participate in, or intervene in (including the publishing or distributing of statements), any political campaign on behalf of (or in opposition to) any candidate for public office.

26 U.S.C. § 7701(a)(14)

The term “taxpayer” means any person subject to any internal revenue tax.

U.S. Statutes at Large (1874 & 1878)
Section 1990

The holding of any person to service of labor under the system known as peonage is abolished and forever prohibited in the territory of New Mexico, or in any other Territory or State of the United States; and all acts, laws, resolutions, orders, regulations, or usages of the territory of New Mexico, or of any other Territory or State, which have heretofore established, maintained, or enforced, or by virtue of which any attempt shall hereafter be made to establish, maintain, or enforce, directly or indirectly, the voluntary or involuntary service or labor of any persons as peons, in litigation of any debt or obligation, or otherwise, are declared null and void.

U.S. Statutes at Large (1874 & 1878)
Section 5526

Every person who holds, arrests, returns, or causes to be held, arrested, or returned, or in any manner aids in the arrest or return of any person to a condition of peonage, shall be punished by a fine of not less than one thousand nor more than five thousand dollars, or by imprisonment not less than one year nor more than five years, or by both.

Thirty-Ninth Congress, Session II
Ch. 187. 14 Stat 546 (1867)

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the holding of any person to service or labor under the system of peonage is hereby declared to be unlawful, and the same is hereby abolished and forever prohibited

in the Territory of New Mexico, or in any other Territory or State of the United States; and all acts, laws, resolutions, orders, regulations, or usages of the Territory of New Mexico or of any other Territory or State of the United States, which have heretofore established, maintained, or enforced, or by virtue of which any attempt shall hereafter be made to establish, maintain, or enforce, directly or indirectly, the voluntary or involuntary service or labor of any persons as peons, in liquidation of any debt or obligation, or otherwise, be, and the same are hereby, declared null and void; and any person or persons who shall hold, arrest, or return, or cause to be held, arrested, or returned, or in any manner aid in the arrest, or return of any person or persons to a condition of peonage, shall, upon conviction, be punished by fine not less than one thousand nor more than five thousand dollars, or by imprisonment not less than one nor more than five years, or both, at the discretion of the court.

26 U.S.C. § 1313(b), 68A Stat 339

Notwithstanding section 7701(a)(14), the term "taxpayer" means any person subject to a tax under the applicable revenue law.

C. Federal Rules of Civil Procedure

Fed. R. Civ. P. 17(a)(1)(F)

Real Party in Interest

A party with whom or in whose name a contract has been made for another's benefit; and

Fed. R. Civ. P. 17(b)(3)(A)

A partnership or other unincorporated association with no such capacity under that state's law may sue or be sued in its common name to enforce a substantive right existing under the United States Constitution or laws.

Fed. R. Civ. P. 41(b)**Involuntary Dismissal; Effect.**

If the Plaintiff fails to prosecute or to comply with these rules or a Court order, a defendant may move to dismiss the action or any claim against it. Unless the dismissal order states otherwise, a dismissal under this subdivision (b) and any dismissal not under this rule—except one for lack of jurisdiction, improper venue, or failure to join a party under Rule 19—operates as an adjudication on the merits.

D. Federal Rules of Evidence**Fed. R. Evid. 301.****Presumptions in Civil Cases Generally**

In a civil case, unless a federal statute or these rules provide otherwise, the party against whom a presumption is directed has the burden of producing evidence to rebut the presumption. But this rule does not shift the burden of persuasion, which remains on the party who had it originally.



PRELIMINARY STATEMENT

Brother's Keeper Ministries (BKM), the real party in interest, is a private "*church*", which is the embodiment of its members' own private Religion/Belief, *i.e.* not Christianity, Jewish or Islamic, etc., and consequently BKM lies outside the public sector and has no relationship or interface whatsoever with said public sector. The Petitioner, as BKM's Authorized Representative, is the only party who interfaces with the public sector on behalf of BKM regarding all matters, including the U.S. Courts. Further, BKM is self-supported through its "*integrated auxiliaries*" such as CAMP NOBLE INC. (CNI), which on its own, as per Congresses' Mandatory Exceptions for "*churches, their integrated auxiliaries*", is not a Federal income/excise taxpayer.



STATEMENT OF THE CASE

The U.S. Court of Appeals for the Federal Circuit's affirmation of the U.S. Court of Federal Claims dismissal of Petitioner's Urgent Complaint is a violation of both FRCP 17(b)(3)(A) and 17(a)(1)(F). Under Rule 17(b)(3)(A), BKM can sue in its common name, through its Authorized Representative, the Petitioner, to enforce its right to procedural and substantive due process and other remedies under the Laws of the United States. Further, The Petitioner, as per his agreement/contract to be the Authorized Representative of BKM, can sue in Petitioner's own name on behalf of BKM,

the real party in interest, under Rule 17(a)(1)(F). Therefore, the U.S. Court of Federal Claims dismissal of Petitioner's Urgent Complaint under Rule 41(b) for not obtaining an attorney and the U.S. Court of Appeals for the Federal Circuit affirmation of said dismissal are violations of both FRCP above. Consequently, The Petitioner did not fail to obey a Court Order to obtain an attorney because no attorney is required because BKM, as a non-State organized private "*church*" cannot have an officer of the Court (attorney) represent it because attorneys can only represent "persons", which BKM is not. The lower Courts' violations of FRCP 17(b)(3)(A) and 17(a)(1)(F) resulted in both Courts denying BKM its right to procedural and substantive due process under the Fifth Amendment. Therefore, BKM, as a non-State organized private "*church*", has been prejudiced by both Courts. This prejudicial denial of due process by both Courts is sufficient for the Petitioner to move this Court to grant Petitioner's Writ of Certiorari.

Because both Courts' violated FRCP 17(b)(3)(A) & 17(a)(1)(F) and denied BKM its right to procedural and substantive due process, they ignored addressing the essential element presented in Petitioner's Urgent Complaint. This essential element is the Appellee/Defendant's presumption that its authority over 501(c)(3) organizations, including religious organizations, extends to "*churches, their integrated auxiliaries*", which it does not. Congresses' Mandatory Exceptions in its Tax Reform Act of 1969 conclusively rebutted this presumption. Congresses' first Mandatory Exception to its Special Rules With Respect to 501(c)(3) Organizations, found at 508(c)(1)(A), 83 Stat 494-495, states that "*churches, their integrated auxiliaries*" have

no requirement to notify the Secretary they are applying for tax-exemption. This means that Congress regards "*churches, their integrated auxiliaries*" as tax-excepted and not tax-exempt, which is a privilege granted by the Appellee/Defendant to organizations it deems qualified to be granted said privilege. Congresses' second Mandatory Exception, found at 6033(a)(2)(A) (i), 83 Stat 519-520, states that "*churches, their integrated auxiliaries*" have a Mandatory Exception from filing with the Appellee/Defendant; thereby, confirming "*churches, their integrated auxiliaries*" tax-excepted standing. Therefore, according to Congresses' clear and unambiguous Mandatory Exceptions, "*churches, their integrated auxiliaries*" are not Federal income/excise taxpayers. As this Court stated in its landmark case, *Chevron U.S.A. v. Natural Resources Defense Council Inc.*, 467 U.S. 837 (1984),

A government agency must conform to any clear legislative statements when interpreting and applying a Law . . . If the intent of Congress is clear, that is the end of the matter; for the court, as well as the agency, must give effect to the unambiguously expressed intent of Congress.

Further, when Congress legislates a Statute as "Mandatory" there is no discretion for the Appellee/Defendant and/or the Courts of the United States to do other than comply with Congresses' mandated statute, irrespective of personal opinion.

It is clear to the Petitioner that the U.S. Court of Federal Claims did not want to adjudicate this case based upon Congresses' Mandatory Exceptions presented in Petitioner's Urgent Complaint. Consequently, the Court sought a way to dismiss the case, resulting

in its use of Rule 41(b). The Court attempted to support its decision by referencing a prior U.S. District Court case that also attempted to have Petitioner obtain an attorney; however, the U.S. Court of Federal Claims failed to mention that the case it referenced was not dismissed under Rule 41(b); it was dismissed for lack of jurisdiction. Further, Petitioner has represented BKM and its "*integrated auxiliaries*" in several U.S. District Court cases as well as several Appellate Court cases and none were dismissed under Rule 41(b). This case is a first. Therefore, the U.S. Court of Federal Claims dismissal and the Court of Appeals for the Federal Circuit affirmation of said dismissal conflicts with the U.S. several District Court and Ninth Circuit Court of Appeals cases regarding FRCP 41(b).

Contrary to the erroneous opinions of both lower Courts regarding who the real party in interest is, the private “*church*”, BKM, is the real party in interest. Its relationship with its “*integrated auxiliaries*” is no different from an Agent/Principal or a Bailee/Bailor relationship, in which relationships the Principal and the Bailor are the real party in interest. As in those Agent/Principal and Bailee/Bailor relationships the non-State organized private “*church*” suffers the injury and/or reaps the benefit from any Court decree, and it is also the only one that possess the power, through its Authorized Representative, the Petitioner, to enforce a Right. Petitioner feels the U.S. Court of Federal Claims knows this and therefore made a conscious decision to not recognize CNI as an “*integrated auxiliary*” of BKM, which it stated in two different Orders it issued. The U.S. Court of Federal Claims’ action is documentary evidence of libel and further, a violation of 28 U.S.C. § 2201(a), 62 Stat 964, by making a prohibited declaratory judgment regarding CNI’s standing regarding Federal income/excise taxes. Further, by purposefully determining CNI is not an “*integrated auxiliary*” of BKM, in an attempt to force Petitioner to obtain an attorney, the Court committed judicial misconduct because the Court’s decision to do so has no other cognizable reason for occurring. Therefore, this action by the U.S. Court of Federal Claims is judicial misconduct and further, it has all the earmarks of discrimination against BKM and CNI.

**A. Nature and Basis of the Federal Income/
Excise Tax**

In addition to the Appellee/Defendant’s FRCP and Statute violations and its erroneous presumption of authority over “*churches, their integrated auxiliaries*”,

resulting in a denial of both procedural and substantive due process, a Constitutional violation, both Courts also ignored the Nature and Basis of the Federal income tax, which both Courts are expected to know.

The 16th Amendment re-initiated the Federal income tax from whatever source derived in 1913 after 31 years of dormancy. It authorized the Federal income tax to be an indirect excise tax, as this Court affirmed in its landmark case *Brushaber v. Union Pacific R. Co.*, 240 U.S. 1 (1916). If the 16th amendment authorized a Federal income tax as a direct tax without apportionment among the several States, the 16th Amendment would be unconstitutional. Therefore, since it is constitutional, the 16th Amendment authorized the Federal income tax as an indirect excise tax. Further, a Federal excise tax requires commercial activity involving Congresses' list of specific goods/commodities Congress determined to be subject to its Federal excise tax. Accordingly, 26 U.S.C. § 7701(a)(14), and 26 U.S.C. § 1313(b) define taxpayer as any person *subject* to any applicable internal revenue law.

Therefore, in addition to non-adherence to Congresses' Mandatory Exceptions for "*churches, their integrated auxiliaries*", the Appellee/Defendant imposed a Federal excise tax upon CNI without any evidence of commercial activity involving Congresses' list of goods/commodities, which is "peonage" and violates the Revised Statutes at Large (1874 & 1878) sections 1990 & 5526, as well as the self-authenticating and competent evidence of the law pertaining to "peonage" at 14 Stat 546 (1867).

Irrespective of CNI's standing as an "*integrated auxiliary*" of BKM, it could not be liable for a Federal excise tax, unless it was commercially involved with

Congresses' list of specific goods/commodities subject to a Federal excise tax, which list the Appellee/Defendant has not provided to Petitioner. Further, Congress does not include human labor as a commodity/article of commerce on its list, as per 15 U.S.C. § 17, 38 Stat 731. Therefore, not only Congresses Mandatory Exceptions for "*churches, their integrated auxiliaries*" renders CNI a non-Federal income/excise taxpayer, the Nature and Basis of the Federal income tax affirms it is not. *Consequently, Congress has conclusively rebutted the Appellee/Defendant's presumption of authority it can impose a Federal income/excise tax upon CNI.* Further, Congresses' Mandatory Exceptions and the Nature and Basis of the Federal excise/income tax satisfy the burden of persuasion under FRE 301 because there is no requirement for the U.S. Courts to be persuaded when Congress makes clear and unambiguous legislative statements, which this Court affirmed in *Chevron U.S.A. v. Natural Resources Defense Council Inc.*, above.

Over six (6) years of bringing several complaints to the U.S. Courts regarding the Appellee/Defendant's failure to acknowledge Congress' Mandatory Exceptions for "*churches, their integrated auxiliaries*" or comply with the Nature and Basis of the Federal income/excise tax, the Petitioner has yet to have a single U.S. Court adjudicate this issue based upon either of the above. All cases Petitioner has brought to the lower U.S. Courts to date resulted in dismissals and affirmations of said dismissals based upon a variety of misapplied FRCP. Therefore, adjudication of the Mandatory Exceptions and the Nature and Basis of the Federal excise tax is imperative; otherwise, BKM, through its "*integrated auxiliaries*", will continue to be deprived of procedural and substantive due process in order to obtain an at

Law or Equitable Remedy against the illegal and unlawful trespasses upon its property and wellbeing foisted by the Appellee/Defendant.



REASONS FOR GRANTING THE PETITION

In addition to dispelling Congresses' Mandatory Exceptions, ignoring the Nature and Basis of the Federal income/excise tax, violating the FRCP 17(b)(3)(A) & 17(a)(1)(F), violating Statute 28 U.S.C. § 2201(a), 62 Stat 964 by purposefully removing CNI as an "*integrated auxiliary*" of BKM, and violating Statute 28 U.S.C. § 2072(b), 62 Stat 961 by using FRCP 41(b) to dismiss Petitioner's Urgent Complaint, resulting in a denial of procedural and substantive due process, both lower Courts have also conflicted with this Court's opinion in *Miranda v Arizona*, 384 U.S. 436 (1966).

Where rights [due process] secured by the Constitution are involved, there can be no *rulemaking* or legislation which would abrogate them.

BKM and CNI's right to procedural and substantive due process was abrogated by both lower Courts via their mutual decision to dismiss Petitioner's Urgent Complaint under FRCP 41(b). As stated above, the actions of both Courts have earmarks of discrimination against BKM and its "*integrated auxiliary*", CNI. Therefore, Petitioner moves this Court to grant Petitioner a Writ of Certiorari.



CONCLUSION

For all the reasons stated above, Petitioner moves this Court to grant a Writ of Certiorari.

Respectfully submitted,

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March 29, 2023