

No. 23- 5165

IN THE
SUPREME COURT OF THE UNITED STATES

JEFF BAOLIANG ZHANG, PH.D.

Petitioner,

v.

LOS ANGELES COJNTY/LOS ANGELES COUNTY

PUBLIC DEFENDER OFFICE, JONATHAN PETRAK, ROURKE STACY

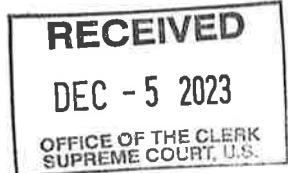
Respondents/Defendants.

**On Petitioner for Review to the California Second District
for the Court of Appeal (Case # B319492)**

October 16, 2023

PETITION FOR REHEARING

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Certificate for Rehearing with Good Faith

The Respondents seriously violated the US constitution, and 42 U.S.C. § 1983, the lower courts in California all shut their eyes with cheating and oppression to rule in complete favor for the Respondents. Therefore, these public officials or employees are now packed together to turn California into a fascist state to oppress innocent Plaintiff. Petitioner cannot find laws in California after being locked up by Respondents for nine years for a violent crime that I did not commit under the false accusation of mental illness. These lawless people also violated Civil Rights Act of 1964 as they practiced strong discrimination against my race and national origin, and my political belief as a China democracy advocate.

Hence, the U.S. Supreme Court should have the duty to defend the authority of the US constitution and federal laws. The rehearing for this case is imperative for American democracy. This Court should not deny to review some fundamental issues related to the Bill of Rights in the US Constitution.

Dated: this 27th day of November 2023

A handwritten signature in black ink, appearing to read "Jeff B. Zhang".

Petitioner, Jeff B. Zhang, Ph.D.

Note: On Nov. 20, 2023, Petitioner received the Clerk's Notice dated November 15, 2023, from this Court, which informed Petitioner to make improvement for this Petition for Rehearing within 15 days. Per Clerk's instructions, Petitioner now files this document on time.

THE KEY QUESTION PRESENTED

1. If the United States Supreme Court does not review this case filled with so many violations in US constitution and the federal laws, who will defend the authority of the US constitution when the state courts involved are all NASTY and CORRUPT in this case? Where can innocent Petitioner find laws and justice in this country?

PARTIES TO THE PROCEEDING

Jeff Baoliang Zhang, Ph.D., Petitioner on review, was the Plaintiff-Appellant below.

Los Angeles County/Los Angeles County Public Defender Office (LACPDO), Jonathan Petrak, Rourke Stacy, and their accomplices, were the Defendants-Respondents below.

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Petition for Rehearing

The Questions presented in the Petition are too important to ignore as the authority of the US constitution and certain federal law are seriously violated by the Respondents but such violations got no legal punishment due to the rampant corruption of the state courts in California. Petitioner respectfully requests/demands that this Court should solve the key Question listed above as rehearing is the only choice for this Court to uphold laws and justice. Otherwise, this is only a fascist country without laws and justice for the common people.

I. The Horrible and Serious Nature of This Case

In this case, Respondents, Los Angeles County Public Defender Office, et al. seriously violated the federal laws in a few ways in this case with serious political and criminal nature as Petitioner pointed out at the beginning of the Petition: **The Lawless Respondents Helped the Chinese Communists in Persecution against Petitioner for Ten Years but the Lower Courts All Refused to Apply Laws and Justice for This Case Filled with Federal Civil Rights Claims.** The despicable Respondents brought tremendous harm to Petitioner for a whole decade for their monetary gains. These monstrous Respondents are a group of white-collar outlaws with so much harm to an innocent man in the bogus criminal case.

II. The Rampant Violation of the U.S. Constitution

Respondents harmed Petitioner so much that they must be subjected to the serious liability to the innocent Petitioner for violation of Bill of Rights including **Amendment I** for freedom of choice in my plea, in **Amendment VI** for “the right to have a speedy and public trial”, in **Amendment VIII** prohibiting “cruel and unusual punishment” and in **Amendment XIV** for abridging “the privileges and immunities,” for depriving “life, liberty or property, without due process of law,” and for denying “the equal protection of the laws.” Throughout the case, Petitioner repeatedly mentioned that Defendants violated **42 U.S.C. § 1983** as they willfully, **under color of law, subjected Petitioner to deprivation of the civil rights guaranteed by U.S. constitution.** Petitioner also stated that they seriously violated **18 U.S. C. Chap. 79, Perjury** as they forced a mentally healthy man to act as a mental patient for ten years with a lot of torture to serve the interest of the Chinese communist regime.

III. The Widespread Corruption of the State Courts

In such a case filled with federal civil rights claim, the state courts in California all used lies and inapplicable state statutes to dismiss this case. They defied the federal laws as they loved to stand on the side of Respondents just because these are public officials. Petitioner repeatedly

pointed out that Petitioner met with a group of public employees who only love the money from the Chinese communists. They hold government positions paid by tax dollars to serve American public but they have worked loyally for the Chinese communists in persecution against a senior US citizen as well as a China democracy advocate for their own interest. Respondents committed intentional tort and fraud which aimed at making plaintiff suffer the long time in the different institutions including mental hospitals, county jail and state prison. But all the state courts shut their eyes as they only wanted to let these outlaws free of their strong legal liabilities by adopting lies and nonsensical state statutes.

IV. The Immense Cheating and Oppression by the Lawless Defendants and by the Corrupt State Courts

Respondents mainly adopted cheating for their sham defense as they used counterfeit court transcripts to cheat the civil court and to oppress Petitioner. Anything unfavorable to them in the transcripts was removed. Defendants added false statements that never happened in the criminal case so that they could escape from their strong legal liabilities. Defendants' illegal conduct got the approval of the state courts. Thus, in a case filled with federal civil rights violations, both the Los Angeles County Superior Court and the California Second District Court of Appeal are very corrupt as they all refused to follow **Amendment XIV** to provide "**equal protection of the law**" to a US citizen, Petitioner in this case. These courts all violated their mission as they refused to be fair and efficient in dealing with such a civil case with serious federal law violations. Such open and terrible judicial corruption is rare in this country.

V. California Supreme Court Illegally Ignores the Rampant Corruption by the Lower Courts

As the state highest court, the California State Supreme Court has the power and duty to review a case filled with so much federal civil right violations and the widespread judicial corruption in the lower courts in California. However, without a cause, this court refused to review this case with *En Banc* to scare Petitioner for reconsideration after Petitioner suffered the intense and long-term imprisonment inflicted by these outlaw public employees who acted like a pack of wolves before an innocent citizen. This State Supreme Court refused to take its duty to work for the law and justice for California. It totally ignores its supervisory duty to stop the immense and widespread corruption at the lower courts of California. It thus became a rubber stamp for the lawless public officials and the corrupt state courts to approve for their impudent conduct without any legal punishment. It is thus a very corrupt court in California.

VI. Defendants Cannot Deny Their Illegal Conduct Anymore

After Plaintiff filed the case to the California State Supreme Court, Defendants could not write a word to argue with Petitioner, which meant they admitted all their lawless conduct against innocent Petitioner. Defendants also admitted the lies that the state courts made for their nasty rulings. Under such a condition, the California State Supreme Court should make a fair ruling to Petitioner in this serious federal civil rights violation case but the Court only issued a notice to deny reviewing. This court thus does not work for federal laws. After Petitioner filed my Petition for Review at US Supreme Court, Respondents again did not give any response. It is illegal that Respondents even failed to file a Waiver while Respondents only kept silent at this case all the time. Such silence meant that Respondents admitted all their lawless conduct in this case. Under such circumstances, this Court should review it as it is a case filled with federal civil rights violations but this Court also refused to review it without a cause. Hence, for such a serious case of law violations without any rebuttals from the Respondents, where on earth can Petitioner find laws and justice when all the facts and violations are clearly stated? Why shouldn't this Court take action to work for laws and justice when the states are all corrupt?

VII. The Strong and Unusual Importance of This Case

This case not only exposed the lawless public officials, the terrible judicial corruption, but also contained issues of high and significant importance. On November 2, 2022, Petitioner filed a petition to the US Supreme Court about the vice of some public officials and private professionals in my bogus criminal case (BA391915). It was docketed as 22-6005 at the U.S. Supreme Court. In the Petition, Petitioner, after giving the facts about the lawless behaviors of Defendants in the section, **“Outlaws at Los Angeles County Public Defender Office (LACPDO) Forced Petitioner to Act as a Mental Patient”** (Petition, p. 28), Petitioner also stated the importance of reviewing this case by the US Supreme Court in the following sections for national significance. All the courts involved let the Chinese communist regime and their American accomplices take control of the criminal case to harm innocent Petitioner. Such an issue is related to the security of this country as the moral conduct of the public officials in this country is so mean that they only want money regardless of who the briber is for the criminal case. With money incentive, these public officials can provide all kinds of illegal service to anyone including the Chinese communists. The Chinese Communists offered bribery to take control my criminal case. Although Petitioner listed so many federal law violations with indisputable facts in the Petition, plus the serious judicial corruption of the state courts, but this

Court denied reviewing such a serious Petition. If outlaws are always free, it reveals the failure of the American democracy, for which this Court is responsible.

VIII. Where on Earth Can a Victim Find Laws and Justice?

This is a country established on democratic principles “with liberty and justice for all” as thus stated in the US constitution. Today, the state courts involved have all turned into fascist courts with cheating and oppression to an innocent man, Petitioner in the case. Can the US Supreme Court allow such fascist conduct at the lower courts in California? Petitioner already suffered for a whole decade due to the persecution of Respondents but the lower courts all refused to apply laws and justice. The state courts only want to protect the lawless Respondents regardless of their serious crime. Since the US Supreme Court refuses to review this case filled with federal civil rights claims, where on earth can Petitioner, a citizen of the United States, find law and justice in this so-called democratic country?

IX. Civil Rights Act of 1964 Prohibits Discrimination Based on Race, Color, Religion, Sex or National Origin

Let's suppose in this case, if Petitioner were the Respondents/Defendants, these Respondents were Petitioners/Plaintiffs, with the same law violations for the case, would these state courts stand on my side? Never! Impossible! Daydreaming! Why so?

Historically, Chinese nationals were strongly discriminated against in this country. There were many examples about such discrimination. Now, Petitioner must point out, these state courts have done such illegal judicial practice against Petitioner because they discriminated against my race and national origin. Although a US citizen for many years, Petitioner has kept the national origin of Chinese. Thus, After Respondents viciously persecuted Petitioner for ten years for their monetary gains, these state courts involved have all cheated and oppressed Petitioner to let them free of their strong legal liabilities. These judges defied the US constitution and certain federal laws as they only shut their eyes to rule in complete favor of the Defendants because Defendants are a group of white public officials while Petitioner is a man of Chinese origin with poor financial status and at senior age. Based on such difference, these courts are so lawless as they openly used Respondents' lies to rule this case when Respondents were already unable to use such lies anymore for their sham defense at the trial court and at the CA Appellate Court.

While the **42 U.S. C. § 1983** that passed in 19th century already **prohibits anyone to subject a man to civil rights deprivation and should be liable for the violation**, the federal Civil Rights

Act of 1964 further prohibits discrimination based on race, color, religion, sex, and national origin. However, these lower courts, due to their strong discrimination of my race and national origin, they thus committed serious violations of these two federal laws in ruling this case. Hence, if the US Supreme Court refuses to review this case, who can uphold the US constitution, **42 U.S. C. § 1983** and the **Civil Rights Act of 1964** in the United States? Why should Petitioner with Chinese origin be willfully cheated and oppressed in this country today after the passage of these federal laws for so many years? Since the state courts willfully cheated and oppressed innocent Petitioner based on their strong discrimination, if your Court denies reviewing this case, where on earth can Petitioner find law and justice?

President Theodore Roosevelt pointed out:

No man is above the law and no man is below it; nor do we ask any man's permission when we ask him to obey it. Obedience to the law is demanded as a right, not asked as a favor.

As a victim of severe persecution and a victim of judicial corruption till this date, Petitioner requests/demands that the US Supreme Court should grant review for this case to defend the US constitution and the other federal laws. These corrupt judges have abused the judicial power so much to let the nasty Respondents stay above the law while they have forced innocent Plaintiff to stay below the law like a subhuman. Such a ruthless fact goes directly against the above teaching.

Conclusion

With all the reasons stated above, the US Supreme Court has the undeniable duty to review such a case filled with federal civil rights violations and serious judicial power abuse. This Court should not let a pack of vicious wolves escape from the laws and justice. This Court should not let a pack of crook judges at the state courts willfully cheat and oppress Petitioner. Petitioner thus requests/demands that this Court should review this case as this Court must uphold the noble principle "with liberty and justice for all" in America!

Dated: this 27th day of November 2023



Petitioner, Jeff Baoliang Zhang, Ph.D., Pro se

No. 23 - 5165

IN THE
SUPREME COURT OF THE UNITED STATES

Jett B. Zhang, Ph.D. — PETITIONER
(Your Name)

VS.
Los Angeles County, et al. — RESPONDENT(S)

PROOF OF SERVICE

I, Jett B. Zhang, Ph.D., do swear or declare that on this date, November 27, 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. *Petition for Reconsideration*

The names and addresses of those served are as follows:

Laura Inlow, counsel for Defendants/Respondents
Collinson, Darhinkie, Inlow & Greco,
Hawthorne Blvd. Ste 800, Torrance, CA 90503-6517

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Nov. 27, 2023



(Signature)