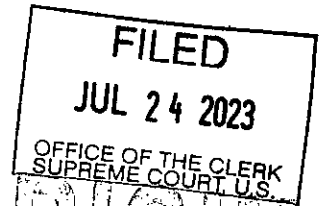


23-5361

No. 23



ORIGINAL

**SUPREME COURT OF THE UNITED STATES**

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ANDREW SLABON

*Petitioner,*

*v.*

ANGELO R. SANCHEZ Et.al.

*Respondent.*

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

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**PETITION FOR A WRIT OF CERTIORARI**

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# I. Question Presented

Whether the original intent of the founders of the United States Constitution allowed for the application of local rules, which were carefully crafted to apply specifically to individual states or districts, such as the state of Illinois, considered one of the most corrupt states in America, to infringe upon the fundamental right to a jury trial as secured by the seventh amendment of the United States Constitution and to deny the citizens the right to be secure in their homes, protecting them from unwarranted and unjustified seizures by the state and force medical procedures by state-run medical industries?

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A. TO AVOID DISMISSALS OF MERITORIOUS COMPLAINTS BASED ON MONETARY POLICIES AND/OR LOCAL RULES, THIS COURT SHOULD CLARIFY WHEN AND HOW LOCAL RULES SHOULD BE APPLIED AND REESTABLISH THE SEVENTH AMENDMENTS FUNDAMENTAL RIGHT TO A TRIAL BY JURY.

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## VII. Petition for Writ Of Certiorari

Andrew Slabon, Respectfully petitions this Court for a writ of certiorari to review the judgement of the United State Seventh Circuit court of appeals for Illinois as well as United States District Court for Illinois.

## VIII. Opinions Below

The decision by the seventh circuit court of appeals denying reversal of the districts court dismissal of petitioner valid complaint. The Seventh Circuit affirmed the district courts dismissal on June 13, 2023. The seventh circuit denied Petitioners request for rehearing enbanc. That order and the

## IX. Jurisdiction

Petitioners 1983 Complaint was dismissed on September 13, 2021, Petitioners Direct Appeal to the Seventh Circuit Court of Appeals was denied on June 13, 2023, Petitioners Timely request for rehearing En Banc was denied on May 15, 2023, Petitioner now invokes this Court's jurisdiction under 28 U.S.C § 1257, having timely filed this petition for a writ of certiorari within ninety days of the Seventh Circuit's final order.

## X. Constitutional Provisions Involved

### 1. United States Constitution, Amendment VII:

In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved, and no fact tried by a jury, shall be otherwise re-examined in any Court of the United States, than according to the rules of the common law.

### 2. United States Constitution, Amendment IV:

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

## XI. Statement of the Case:

The United States Department of Justice, in its meticulous gathering of data, reveals a disheartening truth: Chicago, a city steeped in history's tapestry, bears the ignoble crown of the most corrupt federal judicial district. Since the inception of data collection in 1976, a staggering total of 1,770 convictions have cast a harsh light on the extent of entrenched corruption within its boundaries consistently reaching the very top of Governances. With an average of 41 convictions per year, these numbers reveal the profound magnitude of malfeasance that permeates the district. Moreover, the state of Illinois, ranking as the third most corrupt state on a per capita basis, Notably, Illinois stands alone as the sole state in America to witness the consecutive imprisonment of two governors for acts of corruption, exemplified by the most recent federal indictment of Illinois' former "speaker of the house", presents a distressing truth regarding the pervasive misconduct that plagues our society.

This serves as a sobering testament to the urgent need for vigilant oversight and meticulous scrutiny of the United States Court for the Northern District of Illinois as well as the Seventh Circuit Court of appeals. It is worth noting that the specter of corruption persists to this day, as these deeply entrenched economic policies and systemic corruption have become so deeply woven into the fabric of the district that it is perceived as "business as usual."

In light of Chicago's weighty tally of 1,770 convictions and the enduring shadows cast over the state of Illinois, it is reasonable to surmise that these insidious economic forces and the specter of corruption have permeated the United States District Court for the Northern District of Illinois, serving as a poignant reminder of the imperative to uphold the cherished principles of dignity, integrity, and justice within our esteemed legal system.

The Seventh Amendment of the United States Constitution underscores the vital role of citizen participation in the legal system and safeguards against a judiciary-centric approach to civil case decisions or as in this case, a complete denial of any trial. It recognizes the significance of the collective wisdom and judgment of the community in ensuring a fair and just outcome. This fundamental role of citizen participation in the legal system, ensures that decisions in civil cases are not solely in the hands of any lone judge or state agent such as licens-

ed attorneys. However, it is essential to acknowledge the potential influence of financial interests on the decision-making process of any one judge and allowing such powers to any one individual without any safeguards defies logic and completely renders the entire judicial system worthless.

L.R 56.1 as applied in this case has compromised the true embodiment of the collective wisdom and judgment of the community, as well as the original legislative intent behind the creation of the United States Constitutions Seventh Amendment.

The Seventh Amendment of the United States Constitution was established on December 15, 1791, as part of the Bill of Rights. It guarantees the right to a jury trial in civil cases where the value in controversy exceeds twenty dollars. The amendment preserves the historical and fundamental right to have disputes resolved by a jury, ensuring that individuals have the opportunity to present their cases before an impartial group of citizens. It serves as a critical safeguard for the preservation of justice, fairness, and the protection of individual rights in civil litigation. The Seventh Amendment upholds the principles of due process and underscores the importance of citizen participation in the legal system, ensuring that the decisions made in civil cases are not solely in the hands of judges, but also guided by the collective wisdom and judgment of the community.

For over 232 years The Seventh amendment of the United States Constitution occupies a position of paramount importance within our legal system, representing the bedrock of our fundamental rights and liberties. It is crucial to acknowledge that local rules, while tailored to specific jurisdictions, are subordinate to the overarching principles enshrined in the Constitution. The Constitution stands as the ultimate authority, designed to protect individuals from encroachments by the government and preserve the sanctity of our constitutional rights. In contrast, local rules serve a distinct purpose in facilitating the efficient operation of the courts within their respective jurisdictions. However, it is imperative to remember that local rules must always be interpreted and applied in harmony with the constitutional framework, as the Constitution reigns supreme and its protections transcend any limitations imposed by local rules. The enduring significance of the Constitution and its role in safeguarding our liberties have clearly been compromised by the use and constraints of local rules.

While it is true that local rules such as 56.1 have been tailored to meet the specific needs and practices of the jurisdiction, in this case, the state of Illinois, it is essential to recognize the potential influence of the state's monetary policy in its implementation and enforcement.

The application of local rule 56.1 in this particular case contradicts the principles set forth in the Seventh Amendment of the United States Constitution.

L.R 56.1 as applied in this case has compromised the true embodiment of the collective wisdom and judgment of the community, as well as the original legislative intent behind the creation of the Constitution.

#### 1. Petitioners 1983 Complaint

On January 27, 2014, the petitioner discovered the unfortunate passing of his mother. With no other recourse, the petitioner dialed 911 to request assistance for the necessary arrangements for his mother's burial. However, upon the arrival of medical personnel and police officers, an alarming turn of events unfolded. The petitioner was immediately seized by the police inside his own home and forcefully placed into an ambulance, solely based on the medical opinion of a single Chicago police officer.

It is important to note that none of the medical personnel present at the scene deemed it necessary for the petitioner to receive any form of medical treatment, let alone emergency medical attention.

Despite this, all defendants involved in the incident conspired to file false reports justifying the seizure and falsely accuse the petitioner of committing an act of violence against a nurse at the hospital. This fabrication became the basis for the petitioner's wrongful conviction, resulting in a 25-month imprisonment for a crime he did not commit.

While in police custody, the petitioner endured a harrowing ordeal that defied all notions of medical ethics and basic human dignity. Hospital staff, granting unwarranted confidence to the police, allowed them to engage in invasive medical procedures. It was within this distorted realm that one of the officers, emboldened by the institution's misplaced trust, launched a violent attack upon the petitioner, who lay restrained and defenseless. With callous disregard, this officer mercilessly tugged and pulled on a catheter tube, purposefully inflicting unimaginable pain upon the petitioner's vulnerable body. Throughout this agonizing assault, the pet-



petitioner's desperate cries for help fell upon deaf ears, as the hospital staff callously turned a blind eye to his pleas.

In a gross abuse of power, the police illegally obtained the petitioner's keys to his home while he languished in custody. Seizing this illicit opportunity, the officers brazenly entered the petitioner's residence once again, absent any warrant that the law demands, and callously absconded with valuables such as cash and jewelry. These acts of theft were concealed, conveniently masked by the pretense of an ongoing "investigation." As a result of this despicable intrusion, the petitioner's home was left unattended, falling victim to the destructive grip of frozen water pipes. The home now stands as a testament to irreparable damage and loss, a casualty of the brazen actions of badge-wearing bandits who operate with impunity, bolstered by the district court's unwavering support of monetized policies that prop up the police and the callous machinery of the so-called "criminal justice" bond market.

In the depths of his ordeal, the petitioner found himself unjustly confined as a "pre-trial detainee," adrift in the turbulent seas of self-representation within the distorted confines of the Cook County bond market's warped "criminal justice system." In this desolate realm, corruption's insidious tendrils extend even into the realm of legal representation, where court-appointed "public defenders" bear the ignominious label of "public pretenders." Bereft of genuine advocacy, the petitioner stood as a casualty of the state's enslaving monetary policies, facing the relentless onslaught of false accusations with a solitary resolve, amidst a system that callously perpetuates its abhorrent deeds through corrupt financial maneuvers and an utter disregard for the sanctity of human dignity.

As a consequence of this fabricated reports, accusations and subsequent wrongful conviction, the petitioner was deprived of the opportunity to properly lay his mother to rest. In addition, neglect led to the complete destruction of the petitioner's home. These egregious acts have had a profound and devastating impact on the petitioner's life, leaving him to endure immeasurable suffering and injustice at the hands of "Justice".

The injustice inflicted upon the petitioner originated not only from the defendants but also from those who bear the responsibility of safeguarding justice, the United States District Court. The petitioner endured an additional tortuous eight-year ordeal, navigating the courts in pur-

suit of justice for all, only to be deprived of the opportunity to present their case to a jury. These proceedings, now revealed as pseudo-legal in nature, served to further punish the petitioner for their refusal to acquiesce to the corrupt policies of the state.

This court must acknowledge the petitioner's unjust suffering, inflicted not only by the defendants but also by those entrusted with upholding the pillars of justice—the United States District Court. Throughout an additional and torturous eight-year ordeal in attempts to justice, the petitioner tirelessly navigated the intricacies of the legal system, driven by a steadfast pursuit of justice for all. Yet, their quest was met with a denial of the fundamental right to present their case before a jury.

Petitioner was wrongfully sentenced to 25 months of imprisonment for a crime he did not commit.

The petitioner was denied the opportunity to properly bury their mother, and their home was left in a state of total destruction due to neglect. This series of events has led to the complete devastation of the petitioner's life, it is even more disconcerting to witness the unwavering focus of the United States District Court on meticulous adherence to filing formats and standards prescribed by local rule 56.1.

The fact that such injustice was inflicted not only by the defendants but also by those who are entrusted with upholding justice, the United States District Court has caused irreparable harm to petitioner that can not simply be rectified by monetary relief.

## 2. The Districts Courts Pro Se policy

The district courts have engaged in a concerning practice of systematically dismissing valid complaints brought by pro se litigants based on technicalities and a demand for a greater intelligence well outside the threshold of common man. One notable example is the deliberate recruitment of carefully selected state agents and/or licensed attorneys to represent litigants in cases against the states while simultaneously disregarding the inherent conflict of interest involved in such arrangements.

In yet another striking example of a policy biased against pro se litigants, the district court frequently denies qualified litigants the opportunity to proceed in forma pauperis. In the present

case, despite the petitioner's qualifying for in forma pauperis, the court attempted to revoke petitioner's qualifying for in forma pauperis, the court attempted to revoke petitioner in forma pauperis status during these proceedings despite being qualified and after being granted leave to proceed, during petitioner's incarceration, the district court initially granted permission for the petitioner to proceed in forma pauperis. However, upon the petitioner's release, the court, under the guise of Justice utilizing of this pro se policy, sought to reassess the petitioner's financial status and ultimately ruled against the petitioner, disallowing them to continue in forma pauperis.

During this assessment, the court scrutinized the petitioner's financial circumstances with great enthusiasm, seeking any justification to dismiss the valid complaint based on their newfound eligibility. Nevertheless, the petitioner, undeterred by the court's fervent efforts, filed a motion to reconsider. This motion included compelling evidence, notably the petitioner's \$10,000 debt in unpaid property taxes, directly stemming from the actions of the defendants. The presentation of these irrefutable facts reluctantly compelled the court to accept the petitioner's assertions as true and reluctantly allowed them to proceed in forma pauperis.

While incarcerated, the petitioner filed a motion alongside their complaint, requesting the recruitment of counsel. The court, seemingly eager to fulfill this request, the clerk then made several orchestrated attempts to recruit counsel. However, many of the carefully recruited attorneys failed to meet the necessary qualifications. Eventually, an attorney was selected or "recruited", but to the petitioner's dismay, it became readily apparent that this attorney had no intention of proceeding to trial on the petitioner's valid claims. Instead, they sought to pressure and coerce the petitioner into accepting a settlement and non-disclosure agreement. In response, the appellant swiftly filed a motion seeking to hold this attorney in contempt of court for failing to fulfill their obligations under the federal bar to provide legal representation to the petitioner. Regrettably, the court promptly dismissed this petition, while simultaneously ignoring the petitioner's concerns regarding the actions of this state-licensed agent and/or attorneys to represent them in a case against the state. The court deliberately disregarded the clear conflict of interest inherent in the recruitment of these attorneys to represent them in this particular case against the State, forcing petitioner to proceed "pro se."

In the present case, the dismissal was clearly based on the district court's strict refusal to interpret petitioners complaint liberally leading to an interpretation of the filing format in response to a 56.1 Motion for Summary Judgment as inadequate. The court concluded that the petitioner failed to meet the court's expectations in terms of the filing format, leading to the default belief that no response had been filed. However, it is important to highlight that the petitioner did submit a response in the manner they believed to be the best, thereby challenging the court's rationale in interpreting the situation.

Even more perplexing is the court's apparent disregard for the gravity of the allegations brought forth by the petitioner.

### 3. Direct Appeal

In the process of appeal, the Seventh Circuit Court of Appeals upheld the district court's determination that the petitioner did not meet the expected standards, with the suggestion that this lack of compliance was deliberate. In their decision, the Seventh Circuit cited *F.T.C. v. Bay Area Business Council, Inc.* as a relevant case.

However, *F.T.C.* is distinguishable from the present case due to the fact that the appellants in *F.T.C.*, who were trained attorneys, chose not to file a response and instead submitted affidavits. This particular case differs from the present one because the attorneys involved were knowledgeable about the filing requirements and consciously decided not to adhere to the local rules.

The courts assert, with regularity, that "local rules such as 56.1 exist precisely because the district court is not 'obliged . . . to scour the record looking for factual disputes.'" While it may be argued that the district court is not under a strict obligation to engage in such thorough scrutiny, it is, nevertheless, their inherent duty. Scouring the record and carefully examining the evidence is the very essence of the justice system. Furthermore, it should be noted that local rule 56.1 does not grant the authority to dismiss a valid complaint solely based on a single judge's perception of how a response should be drafted.

In the present case, upon a cursory examination of the record, it becomes apparent that the district court did in fact scour the record.

However, this review was conducted selectively, demonstrating a clear bias in favor of the defendants and with the apparent objective of dismissing the valid complaint. A notable manifestation of this bias is the district court's eager portrayal of the petitioner's behavior during his unlawful detention. The court meticulously combed through the record, highlighting alleged statements by the defendants asserting quotes made by the petitioner on the day of his ordeal, in an apparent attempt to assassinate his character and find justification for the dismissal. In doing so, the court inadvertently exposed its pretextual reasoning in its bias ruling, relying on unrelated factors and actions as a pretext to justify a decision that blatantly infringed upon the petitioner's rights to seek justice.

#### XII. Statement of Argument:

The dismissal of the Petitioner's valid complaint based on a minor technicality disregards the inherent significance of safeguarding an individual's right to access the courts and seek Justice, in addition, to be secure in their homes. The sanctity of the Fourth Amendment's protections against unwarranted seizures and unreasonable searches plays a vital role in upholding personal freedom, dignity, and the right to a jury trial as a safeguard against judicial corruption is precisely the reason jury trials exist. Dismissing such a complaint without due consideration of the public harm incurred erodes the bedrock of justice and undermines public trust in the legal system.

This case evokes profound concerns regarding the state's encroachment upon the sacred realm of the home and the violation of an individual's bodily integrity through the misguided trust bestowed upon the medical profession. Of particular alarm is the covert and readily accessible utilization of coerced medical practitioners, eagerly embracing pseudo-procedures under the façade of pseudoscientific practices masquerading as psychology, all in an attempt to justify these transgressions. Furthermore, the disconcerting collusion between law enforcement officers and medical professionals, and the ease with which these actions occur, bears testament to the entrenched and well established nature of this issue in plain view of the District Court, blurring the boundaries between their respective domains and sowing seeds of doubt regarding the integrity of all disciplines.

Given the gravity of the allegations, it is of utmost importance that the courts expeditiously address this matter and afford the Petitioner appropriate avenues for redress.

The dismissal of the petitioner's valid complaint based on a technicality not only promotes and condones the state's abuse of power but also violates the petitioner's Seventh Amendment right to access to courts and receive a fair trial. Furthermore, the dismissal of the petitioner's complaint without due consideration of the constitutional claims gives rise to legitimate concerns regarding the motivations of the courts. It is of utmost importance for this esteemed Court to not only ensure procedural fairness, but also to diligently scrutinize any potential underlying motives or biases that may have influenced the dismissal. The intervention of this Court is imperative in safeguarding the rights of the citizens, protecting them from the pervasive corruption of the states, in this case Illinois, and its illicit encroachments upon the sanctity of the home as well as the integrity and dignity of United State Justice system.

Moreover, it is crucial to uphold the fundamental principles of a jury trial over local rules, ensuring that corruption cannot prevail and justice is unequivocally served.

These actions of the District and Appellate Courts stand in direct contradiction to the original intent of the framers of the United States Constitution, who never foresaw a scenario where an individual Judge could wield such concentrated power to dictate the access to a trial by jury.

The district court, driven by carefully crafted state monetary policies and its subjective interpretation of an acceptable response, swiftly and unjustly dismissed a valid complaint, flagrantly violating the petitioner's fundamental right to a jury trial, thus inviting corruption to take root within the court's marbled corridors. The right to a jury trial, a cornerstone of our legal system enshrined in the sanctity of the Seventh Amendment, is now jeopardized. This dismissal, predicated upon the arbitrary perspective of a solitary judge regarding the precise manner of filing a response, serves as the catalyst for the petitioner's unjust loss.

The courts' demand for heightened intelligence loses its purpose when tainted by the embrace of corrupt policies, for in doing so, they erode the very essence of the United States Constitution, the bedrock upon which their authority rests. Without unwavering dedication to the Constitution's principles, our society devolves into a lawless jungle.

The Constitution, as the supreme law of the land, reigns supreme, and its provisions must always take precedence over any local rules or procedures. The Constitution's fundamental purpose is to safeguard and uphold the rights of individuals, and any endeavor to prioritize local rules or the discretionary powers of judges over constitutional rights would undermine the bed-rock principles upon which our legal system stands.

Instead of getting entangled in technicalities and local rules, the district court had a duty to prioritize a thorough evaluation of the evidence presented by the pro se litigant and the serious nature of the complaint. Instead, it should have taken decisive action, such as dismissing the defendants' frivolous Motion for Summary Judgment, considering not only their underlying motives for their filing but also the specific circumstances of this case in relation to past cases involving these defendants. By doing so, the court would have upheld the principles of justice and effectively addressed the recurring patterns of misconduct demonstrated by the defendants in previous cases.

In this case, it is evident that both the district court and the Seventh Circuit Court of Appeals have regrettably failed to uphold the fundamental principles enshrined within the United States Constitution, notably the right to a jury trial as guaranteed by the 7th Amendment in civil cases. Instead, their attention has been disproportionately fixated on technicalities, such as filing formats and stringent adherence to local rules, rules which are tailored to the specific jurisdiction, in this case, the State of Illinois, recognized by Department of Justice as a hotbed of corruption. This misguided focus not only undermines the constitutional rights of litigants but also perpetuates the reputation of Illinois as one of the most corrupt states in America.

In its decision, the Seventh Circuit relied on the precedent of *F.T.C. v. Bay Area Business Council, Inc.*, 423 F.3d 627, 634 (7th Cir. 2005), which states "[D]istrict judges are entitled to insist on strict compliance with local rules designed to promote the clarity of summary judgment filings." It is worth noting that this entitlement finds its origin in the foundation of our nation, the Bill of Rights, which safeguards our constitutional rights.

The prioritization of judicial convenience by the Seventh Circuit cannot supplant the fundamental right to a jury trial, especially considering the transformative technological advancements

that have revolutionized the courts' perception and interaction with information.

The district courts and the Seventh Circuit Court, through the misapplication of local rules, the lack of legal standing, and the absence of rational reasoning, have failed to substantiate their position and persuade discerning observers.

The advancements in technology are of paramount importance, comparable to the evolution of human speech, the courts refusal to utilize technology to "scour" the record should not diminish the significance of a jury trial, but rather be embraced to enhance comprehension and facilitate comprehensive analysis. Unfortunately, the courts have instead utilized this technological marvel for their own convenience in dismissing valid complaints. By embracing technology in a manner that reinforces the indispensability of the jury as a critical safeguard of justice, the courts could have upheld the integrity of our legal system. The Seventh Circuit's departure from this foundational principle undermines the essence of our legal system and erodes the trust and confidence placed upon it by the people.

It is incumbent upon this esteemed court to apprehend the profound import that the convenience of the bench shall not trample upon the hallowed and sacrosanct right to a jury trial, especially as we teeter on the edge of an epochal technological advancement that has the potential to supplant the very role of the bench, offering the courts the prospect of heightened comprehension and comprehensive exposition of cases. These technological marvels hold the promise to elevate the administration of justice by eliminating the tedious "scouring" process and must never be employed to undermine or dilute the sacred rights and liberties of the litigants or be used to enslave humanity.

While the archaic notion of entitlements may have carried weight in the bygone era of our founding fathers, in the year 2023, such assertions simply lack the heft to sway the people. The right to a jury trial stands resolute as an enduring pillar of our venerable legal system, enshrining the bedrock principles of equity, accountability, and transparency, as it summons forth a diverse ensemble to deftly balance the scales of truth and mete out justice with the collective wisdom of the community. In preserving and elevating this hallowed right, we not only exalt the very essence of fairness, rectitude, and the majesty of the law, but also fortify the bedrock upon which our society stands.



While local rule 56.1 may be perceived as affording judges the convenience of not engaging in an exhaustive examination of the record, it is precisely the *raison d'être* of the United States district courts, appellate courts, and the United States Supreme Court to prevent the perpetration of such abhorrent acts as delineated in petitioners 1983 complaint. The fact that such atrocities persist to this day serves as a stark reminder of the systemic failures within the United States Courts, a lamentable truth that cannot be ignored.

In the face of such circumstances, the petitioner finds themselves grappling with the weight of a system that is blantly indifferent to their plight. Petitioner stands as a testament to the inherent challenges faced by those who, lacking legal representation and untainted by monetary interests, strive to uphold their rights, the rights of others and seek justice.

Contrary to both the District courts as well as the seventh circuit, the court's assertions, the petitioner was not afforded any leniency or sufficient opportunities to rectify or improve their filings. (*res ipsa loquitur*) This petition is evidence in of itself speaks volumes, as the court's memorandums overlooks the glaring absence of meaningful opportunities provided to the petitioner to address any deficiencies in their submissions or any attempts by the courts to clarify any misunderstandings.

This Court has emphasized in *Grannis v. Ordean*, 234 U. S. 385, 234 U. S. 394 (1914). "The fundamental requisite of due process of law is the opportunity to be heard."

"The opportunity to be heard must be tailored to the capacities and circumstances of those who are to be heard." (*Goldberg v. Kelly*, 397 U.S. 254 (1970))

The petitioner asserts that the *Goldberg* Court bears relevance to the present case, as the petitioner, akin to the indigent litigant in *Goldberg*, finds themselves navigating the legal terrain without the aid of legal representation. In a parallel vein, the petitioner was tasked with submitting a written response to the defendant's Motions for Summary Judgment. However, when the court professed a lack of understanding regarding the petitioner's filing format, it neglected to engage in any meaningful inquiry or clarification such as a hearing, ultimately leading to the dismissal of the petitioner's complaint.

"It is not enough that a welfare recipient may present his position to the decisionmaker in writing or second-hand through his caseworker. Written submissions are an unrealistic option for

most recipients, who lack the educational attainment necessary to write effectively and who cannot obtain professional assistance.” (Goldberg v. Kelly, 397 U.S. 254 (1970))

“Moreover, written submissions do not afford the flexibility of oral presentations; they do not permit the recipient to mold his argument to the issues the decisionmaker appears to regard as important.” (Goldberg v. Kelly, 397 U.S. 254 (1970)).

“From its founding, the Nation's basic commitment has been to foster the dignity and wellbeing of all persons within its borders.” (Goldberg v. Kelly, 397 U.S. 254 (1970))

In this matter, it is evident that the Seventh Circuit Court of Appeals has seemingly overlooked crucial and material facts. Specifically, the Appellate Court appears to have disregarded the deficiencies in the District Court's explanation of the purported comprehensive instructions provided to the petitioner for preparing their response. The Court of Appeals, rather than independently scrutinizing the matter, seemingly deferred to the District Court's interpretation, which was based on local rules governed by the State of Illinois, asserting that the instructions were sufficient and adequately understood by the petitioner.

Moreover, the Court of Appeals failed to accord due significance to the petitioner's cogent argument in his appeal to remand. The petitioner emphasized the glaring absence of any indication in The District Court's memorandum and order that an in-person hearing was conducted to address any misunderstandings. Notwithstanding the petitioner's citation of Goldberg v. Kelly, an established precedent that underscores the importance of a hearing to ascertain or construe a petitioner's response, the Court of Appeals seemingly disregarded this persuasive authority. Goldberg v. Kelly unequivocally demonstrates that, under such circumstances, a hearing should have been conducted or at the very least, considered as the most prudent course of action before the dismissal of the petitioner's meritorious complaint.

These omissions by the Court of Appeals are gravely concerning, particularly considering the magnitude of the allegations leveled against the defendants, especially the “medical professionals” who occupy positions of utmost trust and responsibility within a civilized society. Such a failure to adequately address these matters impinges upon the core tenets of justice and the rule of law, warranting the utmost scrutiny and redress by this honorable Court.

In this particular instance, the district court erroneously assumed the truthfulness of facts presented

by the defendants in their motion for summary judgment, disregarding the potential falsity of such assertions, local rules can not allow such absurdity by technicalities to be had in the court of law.

The application of local rules granted the district court unchanged and excessive level of discretion on a level which defies the very basics of common sense, resulting in a flagrant abuse of power. It is worth noting that the court accepted the defendants' version of events as true, while simultaneously denying the petitioner the opportunity to present evidence establishing the credibility of all named defendants.

"Particularly where credibility and veracity are at issue, as they must be in many termination proceedings, written submissions are a wholly unsatisfactory basis for decision." (Goldberg v. Kelly, 397 U.S. 254 (1970)).

While there may be some understanding for the importance of adhering to local rules and considering certain facts as undisputed, it is fundamentally beyond the authority of such rules or the district court's discretion to undermine a well-founded complaint supported by evidence, or to deny the allegations presented therein. In other words, the purpose of local rules is not to empower the courts to wholly rewrite a complaint, especially in a manner that compels the petitioner to admit to facts they have consistently claimed to be false.

This policy, granting district court judges broad discretion to dismiss valid complaints based on technicalities, effectively empowers judges to assume the roles of both judge and jury if not worse, mankind. By enacting and applying local rules in a manner that circumvents the safeguards established by man through and by the United States Constitution, individuals are unjustly deprived of the opportunity to challenge monetary policies and present their claims to a jury by the discretion of one man. This abuse of discretion by the courts perpetuates the violation of citizens' rights by municipal corporations, as it allows any single judge to unilaterally determine whether a complaint should proceed to trial or not.

In the face of such circumstances, the petitioner finds themselves grappling with the weight of a system that seems indifferent to their plight. Petitioner stands as a testament to the inherent challenges faced by those who, lacking legal representation and untainted by monetary interests, strive to uphold their rights and seek justice.

### XIII. Statement For Granting The Writ

In the realm of jurisprudence, it is unassailable that no artful reasoning can validate the dismissal of a valid complaint anchored in the majesty of the United States Constitution. To accord primacy to local rules, even the deceptive semblance of filing format, over the hallowed principles enshrined within our Constitution is to betray the very essence of justice. For the Constitution, in its majestic authority, stands as the pinnacle of legal governance, an unyielding testament to the preservation and safeguarding of individual rights that must be upheld and protected with utmost diligence and fidelity.

Subjugating constitutional tenets to the caprice of local rules or the exercise of judicial discretion is to invite a discordant melody, one that dissonantly reverberates against the symphony of justice. The Constitution, in its ethereal wisdom, exists as the wellspring from which all other legal precepts flow, a radiant beacon guiding the path towards equity, fairness, and the inviolable rights of humanity.

The decision of the Court of Appeals is plainly incorrect, the dismissal of the petitioner's complaint, unequivocally exhibits a troubling acceptance, endorsement, and rationalization of warrantless intrusions into individuals' homes and unwarranted seizures, which serves as a punitive measure against those who lack the means to secure legal representation. This dismissal, meticulously crafted to target those who dare to challenge corruption and resist acquiescence to its policies, flagrantly undermines the vital protections enshrined within the Fourth and Seventh Amendments of the United States Constitution. Furthermore, it erodes the fundamental principle of ensuring the safety and security of citizens within the sanctity of their own homes while endorsing a corrupted medical industry.

The present case is a textbook example of the courts brazenly advocacy for an ingrained acceptance, a conspicuous endorsement, an unequivocal justification, and indeed, an audacious rationalization of unauthorized encroachments upon the sanctity of individuals' secure homes, shielded by the intricate corridors of subjective interpretations imposed by a single arbiter of local rules, thereby disregarding the foundational principles enshrined by man within the Seventh amendment of the United States Constitution. Moreover, it embraces unwarranted

seizures and, even more unsettlingly, provides succor to a morally corrupt medical industry that operates on fabricated diagnoses and pseudosciences, clandestinely conspiring with local authorities and governments to generate revenue, all driven by the pursuit of personal interest and monetary gain.

This disconcerting reality, cloaked in the veneer of legal authority, evokes prompt action which is the very essence of our esteemed court, reminding us that no solitary arbiter of local rules can adequately represent the collective wisdom and judgment of man .

The District Court's dismissal of the petitioner's complaint, despite the irrefutable evidence at hand, stands as a stark testament to the motives driving their imperviousness to accountability. This glaring discrepancy demands nothing short of a reversal of the lower court's decision, as it fervently underscores the imperative for justice to be served and for these defendants to face the consequences of their unbridled actions.

In light of these pivotal circumstances, it is incumbent upon this Court to reevaluate the district courts decision and judiciously assess the implications of Barrick's involvement in the petitioner's case. Such a scrupulous approach will substantially contribute to preserving the equitable administration of justice and upholding the sacred pursuit of truth in this momentous matter before this august tribunal.

In essence, local rules are a product of the right to a jury trial which is far from a mere procedural formality; the right to a jury trial stands as a vital cornerstone of our constitutional republic and must be safeguarded at all costs. Unlike Local rules, the right to a jury trial represents the embodiment of justice, fairness, and the collective will of the people.

A jury trial embodies the principles of impartiality, allowing individuals to have their cases heard and decided by a panel of their peers who bring diverse perspectives and life experiences to the deliberation process. It is a manifestation of the belief that justice should be determined by a collective conscience, rather than by the arbitrary decisions of a single individual or entity.

The significance of a jury trial extends beyond its legal implications. It serves as a powerful check on the potential abuse of power, ensuring that no one, including the government, is above the law. It instills trust and confidence in the legal system, reinforcing the belief that every

person, regardless of their background or circumstances, has an equal opportunity to present their case and seek justice.

A jury trial fosters transparency and accountability. It requires the presentation of evidence, the examination of witnesses, and the opportunity for both sides to make their case before an impartial jury. This process not only upholds the principles of due process and fairness, but also helps to uncover the truth and ensure that decisions are based on facts rather than speculation or bias.

The present case is a textbook example of the courts brazenly advocacy for an ingrained acceptance, a conspicuous endorsement, an unequivocal justification, and indeed, an audacious rationalization of unauthorized encroachments upon the sanctity of individuals' secure homes, shielded by the intricate corridors of subjective interpretations imposed by a single arbiter of local rules, thereby disregarding the foundational principles enshrined by man within the Seventh amendment of the United States Constitution. Moreover, it embraces unwarranted seizures and, even more unsettlingly, provides succor to a morally corrupt and financially bankrupt medical industry that operates on fabricated diagnoses and pseudosciences, clandestinely conspiring with local authorities and governments to generate revenue shielded by the public's inclination to trust the medical industry, all driven by the pursuit of personal interest and monetary gain.

This disconcerting reality, cloaked in the veneer of legal authority, evokes prompt action which is the very essence of our esteemed court, reminding us that no solitary arbiter of local rules can adequately represent the collective wisdom and judgment of man succor to a morally corrupt medical industry that operates on fabricated diagnoses, clandestinely conspiring with local authorities and governments to generate revenue, all driven by the pursuit of personal interest and monetary gain. This disconcerting reality, cloaked in the veneer of legal authority, evokes prompt action which is the very essence of this esteemed court, reminding us that no solitary arbiter of local rules can adequately represent the collective wisdom and judgment of man.

At this critical juncture of the petition, it is incumbent upon this esteemed Court to duly acknowledge the pivotal figure of the defendant, Kenneth R. Barrick, who holds himself out as a

"medical professional" licensed to "practice medicine" within the jurisdiction of Illinois. Allegations have been proffered against him, suggesting his involvement in a conspiracy with the police to justify the petitioner's alleged illegal seizure in his domicile. Remarkably, despite the gravity of these accusations, the District Court opted to expeditiously dismiss Barrick as a defendant.

Of significant import, Barrick's involvement extends beyond the present case. In a separate bankruptcy hearing before the United States District Court, styled as Fed. Deposit Ins. Corp. v. Barrick, Case No: 13 C 50221, (N.D. Ill. Oct. 22, 2014), the Federal Deposit Insurance Corporation (FDIC) brought forth grave allegations against him. The FDIC vehemently asserted that Barrick had fraudulently falsified crucial information on a loan application, thereby implicating him in acts of fraud and theft. Moreover, the FDIC ventured to launch a counterclaim against Barrick for larceny, earnestly questioning the veracity of his sworn testimony. Specifically, the FDIC expressed profound skepticism over Barrick's representation that a substantial portion of the loan he acquired was surreptitiously pilfered from his bank account without his knowledge.

Pertinently, the District Court in the bankruptcy case undertook the arduous task of scrutinizing Barrick's testimony, ultimately determining that it lacked the requisite credibility. In consequence, the District Court ruled in favor of the FDIC, concluding that the discharge of that particular loan in bankruptcy would be withheld. Nevertheless, the court did not sustain the larceny claim against Barrick, acknowledging his defense that he had signed the loan application without perusing its contents, asserting that a third party had prepared it.

Significantly, it merits emphasis that the said bankruptcy ruling transpired merely two months anterior to the petitioner's encounter with Barrick. Such temporal proximity raises legitimate queries regarding Barrick's integrity and the salient circumstances enveloping his involvement in the petitioner's case. Adding to the disquietude, Barrick has ostensibly eluded service in the present case, having absconded to another state, thereby imparting heightened significance and urgency to the matter.

Indubitably, these unfolding developments bear profound ramifications for the petitioner's claims and the sacrosanct pursuit of justice in this adjudication. The District Court's precipitous de-

cision to dismiss Barrick as a defendant, despite the gravamen of the bankruptcy case and the reservations expressed about Barrick's veracity, appears to veer from the moorings of the evidentiary record. Thus, such actions warrant assiduous scrutiny to ensure the equitable and judicious administration of justice, ensuring that all pertinent facts are meticulously weighed and measured.

This resounding and consequential additional fact relentlessly underscores the chasm of audacity prevailing within the actions of these defendants, as they operate with brazen impunity.

It is incumbent upon this honorable court to duly recognize the origins of the disquieting ease with which all the medical professionals entwined in this case conspired against the petitioner.

Unlike the targeted actions of state governments, directed with unjust intent towards marginalized communities, the medical community encompasses individuals from all walks of life, including the most vulnerable among us, including the innocence of children. When a police officer can manipulate a doctor into embracing a falsified diagnosis following the irrevocable anguish of a son mourning his mother's loss, it behooves the imagination to ponder the depths to which these medical professionals may descend when confronted with potent financial incentives to fabricate diagnoses. Such a sobering prospect gives rise to profound concerns regarding the sanctity and ethical tenets of the medical profession. In light of the petitioner's well-founded complaint, fortified by compelling evidence, a palpable threat looms, casting its dark shadow upon the wellbeing of every individual ensnared within the grasp of the medical community.

The strict enforcement of local rules, as observed in this case, seems to demand a level of expertise and intelligence that surpasses that of the average juror. It is widely acknowledged that local rules are tailored to the jurisdiction in which they operate and their enforcement should align with the policies of that state. In this case, the petitioner was denied access to a jury trial based on the pretext of lacking the necessary knowledge and intelligence, under the guise of local rules carefully crafted by the state of Illinois, a state notorious for its open and blatant corruption. The courts' demand for heightened intelligence loses its purpose when tainted by the embrace of corrupt policies, for in doing so, they erode the very essence of the United States Constitution, the bedrock upon which their dignity rests. Without unwavering dedica-



tion to the Constitution's principles, our society devolves into the natural laws of the jungle, lacking in dignity and order rendering such demands, at best disconcertingly paradoxical.

In the hallowed rooms of the District Courts, where the judiciary derives its power from the venerable United States Constitution, judges bask in a realm of comfort and security under the protective cloak of constitutional authority. Yet, amid this tranquil facade, a disquieting tableau unfolds, district court judges, while graced with the Constitution's blessings, orchestrate a somber symphony of mockery and disregard. They deftly manipulate the very foundation that grants them privilege, employing its noble tenets to thrive in comfort while casting shadows upon its sacred principles. A poignant dissonance echoes between their actions and the Constitution's ethos, beckoning this esteemed Court's discerning gaze to restore harmony, uphold justice, and rekindle the radiant spirit of the law.

In the realm of jurisprudence, the gravitas of a select few judges cannot be relegated to a mere wave of the hand. The artful manipulation of legal conclusions must not be wielded to transmute this noble authority into a tool of suppression. The cherished right to a jury trial, entrusted by the citizenry and mandated by the Constitution, must not be an ephemeral illusion, vanishing amid the intricacies of legal acrobatics.

Amidst this incongruity, this Court is summoned to bestow its wisdom and power, restoring the symmetry of justice. Let the constitutional right to a jury trial shine undiminished, preserving the sanctity of citizens' rights, and ensuring that justice, like a beacon of truth, prevails.

#### **XIV. CONCLUSION**

**In the annals of this Court's history, few matters bear greater import and urgency than the present case before it. The refusal to grant this writ of certiorari would not only fail to address the core issues but also jeopardize the safety and well-being of the American public, placing them at the mercy of an unchecked and brazenly corrupt medical industry controlled by an even more out of control corrupt state of Illinois. The repercussions of such a decision would extend far beyond this courtroom, implicating the very fabric of our constitutional order and entangling the United States of America in a web of secrecy and collusion, all in pursuit of financial gain.**

**In its role as the custodian of justice and the guardian of the Constitution, this esteemed Court bears the weighty duty and authority to act decisively. By granting the writ of certiorari sought, this Court can affirm its unwavering commitment to combat corruption and uphold the sacred principles enshrined within our Constitution. The nation looks to this Court, especially in the era of rapid technological advancements, as a beacon of justice and a vanguard of our democratic values.**

**In this monumental ruling, the Court restores the people's rightful authority, granting them unfettered access to the courts that have been commandeered by self-proclaimed elites and intellectuals. It reinforces the paramount of our democratic ideals, assuring not only present justice but a legacy of it for generations to come. As the nation's eyes are riveted upon this august Court, its decision will indubitably etch an enduring legacy on the trajectory of justice, preserving the people's unimpeded access to the courts and securing justice for our constitutional heritage, spanning generations yet to unfold.**

**To disregard the earnest pleas of the petitioner and shirk the responsibility to hear this case would be to turn a blind eye to the glaring dangers posed by an industry that treads upon the sacred rights enshrined within the Constitution. This Court holds a solemn duty to uphold justice and defend the interests of the American people. The evidence presented by the petitioner unequivocally highlights the alarming conduct of the medical industry directly controlled by the corrupt state of Illinois, conspiring to monetize the invasion of the home and to deprive citizens of their constitutional rights.**

The consequences of a misstep in this instance are staggering. The public safety lies in the balance, with the potential for widespread harm and devastation at the hands of a rogue medical establishment and an out of control Corrupt State. The ramifications of this Court's decision extend far beyond the confines of this case, reaching into the very heart of our democratic principles. To stand idly by and allow such corruption to fester would be tantamount to betraying the core values upon which this nation was founded.

Let it resound throughout history that the eyes of the ages now converge upon this distinguished Court at this seminal juncture. The burden falls upon each Justice to transcend the ordinary and assume the mantle of leadership, steadfastly upholding the cause of justice and preserving the sanctity of our homes, self autonomy and constitutional rights. By granting this writ of certiorari, this esteemed Court possesses the solemn power to deliver a resolute blow against the sinister specters of corruption that seek to undermine our venerable democracy and take refuge within the marbled precincts of justice.

In its role as the custodian of justice and the guardian of the Constitution, this esteemed Court bears the weighty duty and authority to act decisively. By granting the writ of certiorari sought, this Court can affirm its unwavering commitment to combat corruption and uphold the sacred principles enshrined within our Constitution and restore security within the home. The nation looks to this Court, especially in the era of rapid technological advancements, as a beacon of justice and a vanguard of our democratic values.

In this monumental ruling, the Court restores the people's rightful authority, granting them unfettered access to the courts that have been commandeered by self-proclaimed elites and intellects. It reinforces the paramount of our democratic ideals, assuring not only present justice but a legacy of it for generations to come. As the nation's eyes are riveted upon this august Court, its decision will indubitably etch an enduring legacy on the trajectory of justice, preserving the people's unimpeded access to the courts and securing justice for our constitutional heritage, spanning generations yet to unfold.


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The power of the nation are upon this Court, and history will render its verdict. Let it be one of courage, wisdom, and unwavering commitment to the sacred principles of our constitutional republic.

DATED this 20th day of July, 2023

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Andrew Slabon", written over a horizontal line.

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