

NO: 23-5842

IN THE SUPREME COURT OF THE UNITED STATES

In RE: Jessica N. Smith AN ADULT

Ellis Keyes, Plaintiff- Appellant,

Petition for certiorari to the

United States Court of Appeals for the Fifth Circuit

No. 23-60262

Appeal from the United States District Court for the

Southern District of Mississippi

USDC No. 1:23-CV-84

PETITION FOR REHEARING EN BANC

To the Honorable Justice Samuel Alito of the Fifth Circuit and the Associate Justices of the Supreme Court: Plaintiff, Ellis Keyes, Pro Per, hereby petitions for rehearing en banc to the Supreme Court of the United States from the ORDER entered in this action on January 8th, 2024 appended hereto at end.

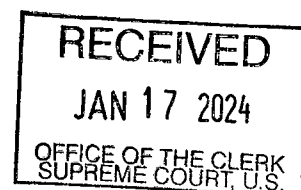
Respectfully submitted



ELLIS KEYES

P O BOX 1073, WHITESBURG, KENTUCKY 41858

elliskeyes@yahoo.com (606) 821-9815



Pursuant to Rule 44. Rehearing

The petition it is restricted to the grounds specified, is presented in good faith and not for delay upon **Intervening circumstances of a substantial or controlling effect** or to other substantial grounds not previously presented.

I have received from Nathan Farmer, Counsel for Marsha Delacroix the Mississippi court appointed temporary Guardian by mail to my home address. It is a revised version of what was sent December 4th. Because Marsha Delacroix is primarily concerned with the selling of the Ward's property and does not like or want to be Guardian she is therefore unfit to do such duty and is in dereliction of that duty and so disqualified from having such authority legitimately requiring that I be appointed immediately to Guardianship.

A Temporary Guardianship has been Ordered by the Mississippi Chancery Court pursuant to the Order dated August 2, 2023, appointing, MARSHA DELACROIX, in this Cause No. 23PR-00154-CS. At the hearing the Ward Jessica Smith was questioned and responded by Zoom Hearing video conference, when asked who she wanted to be her Guardian, she told us the person she wants to stay with when she is released from Hospital who she is

"my Dad" clearly her wish should be granted for good cause that the temporary Guardian does not want to take care of her and does not like her and is only interested in selling her estate and taking ownership of the house, in effect stealing Jessica's house and inheritance as a covetous sibling but the possibility not predicted by this oppressive relation is the simple fact that Jessica will recover from her traumatic suffering at the Hospital even enduring the torture treatment she has been subjected to and she will become competent to manage her own affairs by the benevolent advice and reasonable guidance of family structure as set forth in our Articles of Incorporation of Cook Keyes Land Inc. a Kentucky Family Corporation for the purpose of Land Management to protect and preserve these holding for future generations.

Marsha does not want to be Guardian has not talked to Jessica or received calls from Hospital social workers and keeps her telephone number private so cannot be bothered and has many personal problems impeding the duties of Guardianship, having had her husband pass away recently and buried and the burden of financial problems is too much to bear, even unable to maintain the property in her custody and control with all the responsibility involved and she has at least implied the belief that I am best qualified for the position of Guardian because her moving paper says she will transfer Guardianship

Ellis Keyes, has secured an Order of Guardianship and Conservatorship through the Court of Lecture County, Kentucky, at which time as permitted by This Court the funds be transferred to said Guardian/Consewator for the care of the ward, JESSICA N. SMITH.

...

2. Authorize the Petitioner to execute any and all documents necessary to transfer said funds from said sale be held in the Registry of the Court until such a time that, Ellis Keyes, has secured an Order of Guardianship and Conservatorship through the Court of Lecture County, Kentucky.
3. Award the Petitioner such other general and specific relief to which he may be entitled to in law, equity and good conscience.

Respectfully submitted,


MARSHA M. DELACROIX, PETITIONER

Is/ Nathan S. Farmer
NATHAN S. FARMER
BAR NO. 09353
P.O. BOX 1608

Conservatorship to me in Kentucky's Letcher County Jurisdiction. For this reason, I should be appointed as Guardian now to avoid delay.

Her attorney of record is who has mailed me these documents as follows:

NATHAN S. FARMER, P.A.
Attorney-At-Law

IN THE CHANCERY COURT OF PEARL RIVER COUNTY STATE OF
MISSISSIPPI

IN IN THE MATTER OF THE
AND CONSERVATORSHIP OF
JESSICA N. SMITH

Return

IN THE MATTER OF THE GUARDIANSHIP
AND CONSERVATORSHIP OF
JESSICA N. SMITH

00154-cs

MARSHA M. DELACROIX TITONER . . .

The Petitioner request that the funds from said sale be held in the Registry of the Court until such a time that,

PETITION FOR REHEARING EN BANC

PICAYUNE, MS 39466
PHONE: (601) 749-8745
FAX: (601) 749-7045

VERIFICATION

STATE OF MISSISSIPPI
COUNT OF PEARL RIVER

PERSONALLY APPEARED before me, a Notary Public in and for the above named jurisdiction, the above named and signed MARSHA M. DELACROIX, who, on oath before me, stated that he/she/they are the Petitioner in the foregoing Petition and that all matters and facts therein set forth and alleged are true and correct as therein stated.

Marsha M. Delacroix
MARSHA M. DELACROIX

Sworn to and subscribed before me on this,
his, the 4th day of December

Norma Broder the
A.D., 2023.



MY COMMISSION EXPIRES

NOTARY PUBLIC

APPOINTMENT OF A GUARDIAN/CONSERVATOR

PETITION FOR REHEARING EN BANC

The facts alleged and the remedies show that the cause of action is essentially for the tort of intentional infliction of emotional distress, therefore constituting a federal question within the exclusive federal question jurisdiction of the United States courts. *Davila v. Patel*, 415 F. Supp. 2d 528, 529 (E.D. Pa. 2005) The respondent's behavior is as majority of a disciples of a dangerous religious death cult whose worship of the torture murder abomination Antichrist subjects them to extreme delusions from the belief that Torture and Murder are equal to love and salvation such that this logical contradiction with reality renders them incapable of making a decision for the common good. Such criminal fantasy is based on a false belief logically impossible because Cause and Effect are one and the same so that illegal torture and murder cannot be the cause of salvation.

Petitioner demands his daughter be released from the sadistic tyranny respondents have created and return her to her family at once and to my custody and care as she has asked me to demand her release at once and without further delay. Respondents are so delusional and dishonest that they do not understand that there is nothing wrong with nature, it is reality and perfection, they believe in an original sin and set forth to destroy the brain of my daughter and it was completely unnecessary, they did not need to turn her

into a vegetative state incapable of even making a call to me and the respondents refuse to assist her to help her make a phone call.

CONCLUSION

I seek a preliminary injunction to remove torture from practices by AND for such other further relief as is just and proper

PETITIONER APPOINTMENT OF A GUARDIAN/CONSERVATOR

Please appoint me as Guardian, Stop the Electroshock lobotomy torture, Torture is illegal, should and must be abolished, an abomination. Please take the appropriate action to restrain them from crimes against humanity. Where one family member objects the institutions are required to stop the ECT. Let the court grant that the appropriate relief be had from these pleadings.

RESPECTFULLY



Ellis Keyes, Propria Persona

PO BOX 1073

WHITESBURG, KENTUCKY 41858 (606) 821 9815

PETITION FOR REHEARING EN BANC

Supreme Court of the United States
Office of the Clerk
Washington, DC 20543-0001

Scott S. Harris
Clerk of the Court
(202) 479-3011

January 8, 2024

Mr. Ellis Keyes
P.O. Box 1073
Whitesburg, KY 41858-1073

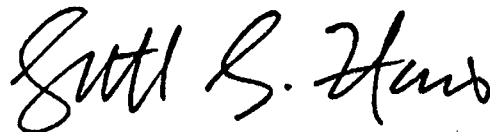
Re: Ellis Keyes
v. United States Court of Appeals for the Fifth Circuit
No. 23-5842

Dear Mr. Keyes:

The Court today entered the following order in the above-entitled case:

The motion of petitioner for leave to proceed *in forma pauperis* is denied, and the petition for a writ of certiorari is dismissed. See Rule 39.8.

Sincerely,



Scott S. Harris, Clerk