

23-6050

No. _____

FILED

JUN 05 2023

OFFICE OF THE CLERK
SUPREME COURT, U.S.

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

Khosrow Rahimi — PETITIONER
(Your Name)

vs.

City of Sheridan et al. — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

United States Court of Appeals for the Ninth Circuit
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Khosrow Rahimi
(Your Name)

3822 SE. Licyntra Ln.
(Address)

Milwaukie, OR. 97222
(City, State, Zip Code)

202-803-3103 or 503-804-6026
(Phone Number)

RECEIVED

SEP - 8 2023

OFFICE OF THE CLERK
SUPREME COURT, U.S.

QUESTION(S) PRESENTED

1. **Sole Reliance on Statute of Limitations:** Why did the defendants solely rely on the statute of limitations as their claim against me? It appears that the defendants have used the expiration of the statute of limitations as their primary argument to dismiss my case. I question the validity and fairness of this claim, considering that my attempts to seek assistance and compensation from the City and State were met with delays, failure to help, and misleading actions. I seek clarification on whether the defendants' heavy reliance on the statute of limitations adequately addresses the underlying issues of misconduct and violation of my rights.
2. **Violation of Civil, Constitutional, and Property Rights:** How were my civil rights, constitutional rights, and property rights violated in this case? I believe that the defendants' actions, including the re-designation of my land as wetland and later changing it back to light industrial, have infringed upon my fundamental rights. I seek clarification and redress for these violations.
3. **Lack of Environmental Justification:** Why did the defendants not provide any environmental justification for changing the land back to light industrial, favoring the new owner? I request an explanation for the sudden reversal of the land's designation, as it appears to have been detrimental to my interests while benefiting others. Understanding the reasons behind this decision is crucial to establishing the fairness and legitimacy of the actions taken.
4. **Absence of Assistance from City & State:** Why did the City and State fail to provide me, as a taxpayer seeking help, with the necessary support and guidance when I reached out to them after my land was taken from me? I entrusted them to address my concerns and provide assistance in navigating the situation. Their lack of intervention and misleading actions have exacerbated my predicament, and I seek an explanation for their failure to fulfill their responsibilities.
5. **Examination of the Case and Loss of Property:** Can we thoroughly examine the circumstances surrounding the loss of my land and investment? I request a comprehensive evaluation of the case to determine the factors that led to the adverse outcome. Understanding the reasons behind the loss of my property and investment is crucial in seeking justice and appropriate compensation for the damages incurred.
6. **Fairness and Impact on a Taxpaying Citizen:** Is it fair to subject a taxpaying citizen to such treatment, resulting in the loss of property and homelessness? I urge the court to consider the

QUESTION(S) PRESENTED

profound impact this case has had on my life, transforming me from a successful landowner to a homeless individual. Evaluating the fairness of these circumstances is essential in ensuring equal treatment under the law and protecting the rights of taxpayers.

7. Failure to Provide Compensation within the Statute of Limitations: Why did the City and State fail to provide the compensation I deserved when this situation unfolded, especially considering that we were still within the applicable statute of limitations? I seek an explanation for their inaction and the subsequent use of the statute of limitations as a basis to dismiss my case. Understanding the reasons behind their failure to fulfill their obligations is crucial to addressing the injustice I have faced.

Sincerely,

Khosrow Rahimi

202-803-3103

A handwritten signature in black ink, appearing to read 'K. Rahimi', followed by a date '12/11'.

LIST OF PARTIES

☐ All parties appear in the caption of the case on the cover page.

☒ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

- Rahimi v. State of Oregon, No. 3:20-CV-01607-AC, U.S. District Court of Appeals for the ninth circuit, Judgment entered 3/23/2023.
- Rahimi v. State of Oregon, No. 3:20-CV-01607-AC, U.S. District Court of the District of Oregon, Judgment entered 7/28/2021.

RELATED CASES

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www.casetext.com/case/rahimi-v-city-of-sheridan

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OTHER

IN THE
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

☒ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

☐ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was December 15, 2022.

☐ No petition for rehearing was timely filed in my case.

☒ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: March 20, 2023, and a copy of the order denying rehearing appears at Appendix A.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☐ For cases from **state courts**:

The date on which the highest state court decided my case was 7/28/2021.
A copy of that decision appears at Appendix B.

☐ A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

STATEMENT OF THE CASE

In this case, I, an individual without legal representation, assert that the City and State law firms engaged in misleading conduct, which ultimately resulted in the lower courts denying my claim due to the expiration of the statute of limitations. The crux of my complaint lies in the City and State's failure to compensate me adequately for my land. Prior to the City designating my land as wetland and rendering it unusable and unsellable, its value had appreciated to \$3,750,000. Subsequently, the zoning and designation were altered to Industrial, benefiting a new owner.

Considering my vulnerable situation as an elderly, sick, and homeless individual, I seek the court's recognition of my circumstances and request that my case be considered by the Supreme Court of the United States. I am of the belief that this case merits examination at the highest level due to the alleged misconduct and the significant *impact it has had on my life.*

Kindly assess all the evidence I have diligently presented in the lower courts. I urge you to critically evaluate the actions and decisions of both the State and City in relation to this matter. It is of utmost importance to scrutinize any potential wrongdoing and failures on their part that have contributed to the circumstances leading to this case. Your comprehensive analysis of these aspects will play a pivotal role in ensuring a just and equitable resolution.

Sincerely yours,

Khosrow Rahimi
202-803-3103

A handwritten signature in black ink, appearing to be 'K. Rahimi', written over a horizontal line.

REASONS FOR GRANTING THE PETITION

The whole thing is the Defendants damaged my investment/property and they have to pay for it. When they didn't pay for the damages before the statute of limitations was finished, they failed. Now they have to pay almost 40 million if not 40 billion dollars (as business grows). By punishment like this, they will not do this again to any other citizen. Looking forward to get justice served before this true story goes to the news/media outlets.

The Governor is responsible to force Constitutions!? My future depended on my land, my airport and home. I am an aircraft crash survivor (super powers saved me, this time hoping the Supreme Court saves me. I have been hurt mentally & physically. Causing damage to an immigrant/minority with a hard labor job that led to a big financial crash disaster.

They did to me exactly what their ancestors did to the Native Americans years ago, except not killed me. Pushed me to the edge to do something wrong but I am strong & controlled myself. Because this would be a shame for my family, friends and all Immigrants.

They took my land by tricking me. Before I sleep and before I wake up, I am fighting with authorities for my Constitutional rights. End of life is when you have rights but can't get it.

Please do not expect me to do more paperwork, I am sick, old, homeless and no access to the internet. I am old fashioned, not an attorney and only use plain language.

I need my compensation for damages done to my property (land/airport/home).

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

KHOSROW RATHI

Date: 6/5/2023