No. 23-6163

IN THE

Supreme Court of the United States

VIDALA AARONOFF,

Petitioner,

v.

CURTIS OLSON.

Respondent.

On Petition for Writ of Certiorari to
The Court of Appeal of the State of California
Second Appellate District

PETITION FOR REHEARING

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Petitioner in pro se

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CERTIFICATION

I, Vidala Aaronoff, Petitioner do hereby certify that the attached Petition for Rehearing of the Certiorari Petition is restricted to other grounds that were not previously presented in the Petition for a Writ of Certiorari. I also certify that this Petition is presented in good faith and not for purposes of delay.

Vidala Aaronoff

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PETITION FOR REHEARING

Petitioner Vidala Aaronoff submits this petition for rehearing of this Court's February 20, 2024 Order denying her petition for a writ of certiorari.

REASON FOR REHEARING

This Court's Rule 44.2 authorizes a petition for rehearing based on "other substantial grounds not previously presented." The substantial grounds not previously presented are the requirements of Fourteenth Amendment due process, which require access to courts. The California appellate courts have overturned and eliminated the trial court's equitable "ability to pay" time honored doctrine effectively chilling indigent victims like Petitioner Aaronoff's access to the court's protection against sexual assault, intimidation and stalking. The appellate court has given billionaire Respondent Olson the green light to imposed millions of dollars in off-set attorney's fees against Aaronoff even though she is an equally prevailing party via a loophole for the super-rich. The appellate court's ruling insulates wealthy predators from accountability and simultaneously chills victims' access to redress their grievances in the courts in violation of the Fourteenth Amendment due process requirements.

Petitioner Aaronoff respectfully requests this Court review the imposition of millions in attorney's fees against her in this case because the exorbitant financial penalty represents an insurmountable barrier to access to the courts in violation of the Fourteenth Amendment due process requirements. "[T]he historical practice of equity, which for centuries has provided courts with the power "to protect all rights and do justice to all concerned." *Rubber Co.* v. *Goodyear*, 76 U.S. 9 Wall. 805, 807 (1869); *Acheson Hotels, LLC v. Laufer.* No. 22-429, 601 U.S. 1, 144 S. Ct. 18 (2023).

I. Factual Background

Petitioner Aaronoff was an applicant for a Civil Harassment Restraining Order (CHRO) against Respondent Curtis Olson, billionaire owner of Nexus, a real estate development company. Olson purchased a rent-controlled apartment building, where Petitioner Aaronoff resided as a renter and employed her as the onsite property manager. (165a, 215a, 216a)[1] Although Olson lived in another town with his wife and children, he immediately kicked out a renter and moved into an apartment unit near to Aaronoff's unit. During her employment, Olson made inappropriate and unwelcome sexual advances towards Aaronoff, and retaliated by terminating her employment when she rejected those advances. (216a) Subsequently, Olson transferred title of Aaronoff's residential rental property to his co-investor, Max Wilcox. (218a) Petitioner Aaronoff continued working for Wilcox as a property manager and trustee. (215a, 198a-201a)

In 2015, Olson sexually assaulted and physically restrained Aaronoff, after he had lured her into his apartment unit under false pretenses. (222a) She only narrowly escaped being raped during this incident. (162a) Petitioner Aaronoff was deeply traumatized by this incident and sought protection from further sexual violence by obtaining from the CHRO court a three-year protective order "Stay Away" agreement on December 10, 2015. (161a-162a)

After a disabling injury, Aaronoff became indigent. (166a, 222a) In 2017, just two years into Aaronoff's 2015 three year protective order, Olson violated it. Thus, Aaronoff sought enforcement of her protective order to prevent further sexual violence and stalking by Olson. Aaronoff filed her enforcement restraining order in pro per because she could not afford to pay counsel.

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[1] References herein are to the Petitioner's Appendix

In retaliation for Aaronoff's attempts to protect herself from Olson, he immediately filed a meritless cross-restraining order application based on the protected activity of process of service. Olson claimed that he needed a restraining order against Aaronoff because her process server purportedly "frightened him." (185a) Olson had the financial means to afford expensive "Big Law" counsel throughout his CHRO litigation. The two restraining order applications were combined. (248a)

Subsequently, Aaronoff obtained an attorney, Benjamin Kanani, on contingency, who believed he could win her case and receive attorney's fees as the prevailing party to pay his fees. Of course, Olson's restraining order was denied but Aaronoff's good faith restraining order was also denied. (16a, 186a) Aaronoff's attorney had to end his representation after he failed to obtain a restraining order, leaving Aaronoff to battle the attorney's fees portion and post-trial matters alone, in pro per.

Neither party prevailed in chief to obtain a restraining order. However, the trial court determined that both parties were prevailing parties in defense because each party prevented the other party from obtaining a restraining order. (166a)

"In the interests of justice" the trial court next determined each party's "ability to pay" attorney's fees in accordance with the court's equitable doctrine. (63a-66a) Petitioner Aaronoff submitted her court-granted fee waiver with other evidence proving indigency. (18a, 248a) However, Olson submitted a declaration containing false statements and hearsay, purporting that Aaronoff owned the property in which she rented. Olson provided no deed or other document to substantiate his false claim as required per the clear and convincing standard in California Evidence Code § 662 and the Statute of Frauds, Cal. Civ. Code § 1624.

After Olson falsely asserted that Aaronoff was the owner of real property, he

falsely claimed that Aaronoff transferred the property to a trust. Actually, the true owner of the property, Max Wilcox, transferred the property to a trust. Olson implied that there existed a deed with Aaronoff's name on it, but he could never produce such a deed, because it did not exist. (79a, 84a-86a, 200a, 249a) Further, Olson inflated the property's value to more than double the actual estimated value, by manipulating property value algorithms. Using this fraud on the court as his factual basis, Olson then falsely stated to the court that, "Petitioner is worth seven figures!" (165a, 248a).

Because the trial court improperly credited Olson's misrepresentations about Aaronoff's ownership of the property, the trial court incorrectly believed Aaronoff, an indigent pro per litigant, had the ability to pay. Of course, billionaire Olson's attorney's fees and costs were significantly higher because he had the means to afford expensive counsel throughout, compared to Aaronoff's use of a short-term sole practitioner attorney. The trial court awarded Olson about $120,000 and Aaronoff about $40,000 for their respective attorney's fees, which resulted in an offset award to only Olson. The trial court imposed this offset attorney's fees award in Olson's favor against Aaronoff totaling an outrageous $80,000. (39a, 251a) The $80,000 offset award for Olson makes it appear as if he was the sole and only prevailing party, when in fact Aaronoff equally prevailed in defense too. Just because of Aaronoff's indigency, she is punished with a crushing attorney's fee debt, which Olson can significantly increase by charging his collection effort attorney's fees against Aaronoff too, serving the added purpose to undermine her legal action to seek damages against his sexual assault and harassment.

Subsequently, in Petitioner Aaronoff's appeal of the attorney's fees, the appellate court improperly overruled the trial court's equitable considerations of "ability to pay" when determining an award of $80,000 attorney's fees in Olson's favor by just eliminating "ability to

pay" effectively side-stepping the issue of property ownership. *Aaronoff v. Olson, et al.,* No. B295388. (22a, 27a). This is all the more egregious as not only did the trial court state that "fees would be determined in the interests of justice" upon each party's ability to pay, but restraining order trial courts are non-jury courts of equity, which require them to consider each party's financial ability to pay. If trial courts do not do this, they become instruments of the rich to crush the poor into debt slavery.

Aaronoff *and her family* have been financially ruined by this judgment. With the elimination of ability to pay determinations Olson has racked up over three million dollars ($3,000,000) in attorney's fees because the courts have allowed him to add his new and evolving collection efforts (i.e., attorney's fees and costs) to the original $80,000 fee award. Olson's collection efforts include derivative lawsuits against Aaronoff's mother, brother, minor nephew and her former employer, among others, and fees for sending attorneys and process-servers to different states and even to Munich, Germany, where her brother and his son live, in search of that nonexistent $80,000. Olson also influenced the CHRO court to strip the owner's property title of the rental property where Aaronoff resides so he could purchase it. Then in post-trial collections Olson influenced the courts to award him attorney's fees and costs for the purchase of that property (the same property he claimed that Aaronoff owned). Of course, Olson is now evicting Aaronoff from her rental home. (16a-18a, 23a, 84a-86a)

Why would a billionaire spend over $3 million to recover an $80,000 dollar judgment against a woman on food stamps?

II. California Provides Widely Divergent Standards for Different Types of Restraining Orders.

California law recognizes two different types of restraining orders—Civil Harassment

Restraining Orders (CHROs) and Domestic Violence Restraining Orders (DVROs). Cal. Code Civ. Proc. § 527.6 (s); Cal. Fam. Code, § 6344(b). Because Petitioner Aaronoff's harasser was not an intimate partner or family member, but a neighbor, she was not eligible to apply for a DVRO. Under California law, the two types of restraining orders are treated very differently. There are much greater protections which apply to applicants for a DVRO, but which do not apply to applicants for a CHRO.

The greater protections given to a DVRO applicant regarding access to courts is two-fold. First, the statute explicitly provides for attorney's fees to the prevailing party *only* "if the respondent establishes by a preponderance of the evidence that the petition or request is frivolous or solely intended to abuse, intimidate, or cause unnecessary delay." Cal. Fam. Code, § 6344(b). Thus, in the ordinary case in which the restraining order is sought in good faith, the court cannot grant attorney's fees to the prevailing party who prevented a restraining order.

The rights of domestic violence victims are further safeguarded by a provision that explicitly requires the court to determine "that the party ordered to pay has, or is reasonably likely to have, the ability to pay." Cal. Fam. Code, § 6344(c).

However, these protections are non-existent for victims who *do not* have a consensual intimate or domestic relationship with the perpetrator, even if they are stalked, threatened, and even sexually assaulted. Thus, while a woman harassed by her husband is able to invoke enhanced protections under the law when seeking a restraining order, a woman who is raped by her neighbor lacks access to such protections.

The legal provisions for a CHRO provide that, "[t]he prevailing party in an action brought pursuant to this section may be awarded court costs and attorney's fees, if any." Cal. Code Civ. Proc. § 527.6(s). There is no requirement that the court determine whether the

restraining order action was brought in bad faith or that the court take into account the applicant's ability to pay, when determining whether to grant attorney's fees to the prevailing party. However, under overarching California case law, there are equitable provisions for ability to pay determinations that should be applied to every case where the Code of Civil Procedure lacks such protections, so indigent litigants may also access the courts. *See e.g.*, *Garcia v. Santana*, 174 Cal.App. 4th 464 (2009). In *Garcia*, the court ruled that:

> Using fee awards as an instrument to deny access to the courts is neither the policy of the State of California, nor the purpose of the statute in question. Indeed, California Rules of Court, rule 10.960, subdivision (b), adopted effective July 1, 2008 states: "Providing access to justice for self-represented litigants is a priority for California courts."

174 Cal.App. at 467.

III. Fourteenth Amendment Due Process Prohibits Financial Barriers to Access to Courts

Access to justice is a fundamental right, universally recognized in Anglo-American jurisprudence since long before America was a country. *See Baltayan v. Estate of Getemyan*, 90 Cal.App.4th 1427, 1436-39 (2001)(Johnson, J., concurring). Rights guaranteed by the Constitution can only be protected when victims are able to vindicate them through the legal system. As the Federal Circuit has ruled,

> "It is a fundamental principle of our jurisprudence that access to the courts to secure and establish important rights should be made available to all citizens at all times. This is particularly true where the complaining parties are asserting claims under the Constitution...."

Atkins v. United States, 556 F.2d 1028, 1040 (Fed. Cir. 1977).

Multiple federal courts have ruled that Fourteenth Amendment Due process protects the right of access to courts. *Snyder v. Nolen*, 380 F.3d 279, 291 (7th Cir. 2004) ("The right of individuals to pursue legal redress for claims that have a reasonable basis in law or fact is

protected by…the Fourteenth Amendment right to substantive due process. "); *see also Lane v. Tennessee,* 315 F.3d 680, 682 (6th Cir. 2003)("Among the rights protected by the Due Process Clause of the Fourteenth Amendment is the right of access to the courts."); *Bayou Fleet, Inc. v. Alexander*, 234 F.3d 852, 857 (5th Cir. 2000) ("Access to the courts is a constitutionally protected fundamental right and one of the privileges and immunities awarded citizens under…the Fourteenth Amendment.").

Financial penalties are one of the most common and most damaging types of barriers preventing access to the courts. Financial penalties which prevent access to the courts violate Fourteenth Amendment requirements of due process. This is a well-established constitutional principle which has been recognized by this Court for decades. *Boddie v. Connecticut*, 401 U.S. 371, 380-81 (1969) (ruling that a cost requirement which prevented a litigant from obtaining a divorce was a violation of 14th Amendment due process.)

In this case, the exorbitant award of attorney's fees imposed on Petitioner Aaronoff would be an insurmountable barrier for any indigent litigant who needed a restraining order because of physical abuse, stalking, intimidation or sexual assault. There is no policy reason to treat applicants for the two types of restraining orders so differently. Thus, the failure of the appellate court to consider income in awarding attorney's fees in CHRO cases violates the Due Process clause of the Fourteenth Amendment.

This oversight allows the courts to infringe on the rights of indigent applicants for CHROs to life, liberty and property. It has infringed on the rights of Petitioner Aaronoff in the following ways:

First, The right to life is infringed, because Respondent Olson's abusive behavior is so severe and traumatizing that Petitioner Aaronoff feels extremely unsafe in her own home. Over

a period of nearly eight years, Aaronoff has been stalked, harassed and threatened by Olson, as well as covertly photographed, followed, and threatened by persons she knows or reasonably believes have ties to Olson. When Aaronoff turned to the court for protection and relief, the court denied her protection. Moreover, the court imposed on Aaronoff an oppressive and unbearable financial burden.

Second, The right to liberty is infringed, in that the harassment she has suffered has restricted her freedom and sense of security in her own home. She has had her house guests harassed, interrogated and covertly photographed, even in her bathroom while undressed. Her witnesses have been threatened—one even with a gun—and she believes that Olson, attempted to harm her, when her process server had a poisoned reaction to food and a drink intended for Aaronoff by Olson's agents. (163a) Aaronoff has been threatened with bodily harm by Olson's attorney. The courts failed to remedy this infringement, and indeed added to it.

Third, the right to property has been infringed because the court has saddled Aaronoff with astronomical attorney's fees for seeking to extend the restraining order to protect herself from the never-ending, egregious harassment she was suffering. (37a-39a) Aaronoff's right to property in her rental home has been infringed because the trial court, in violation of the automatic stay, improperly voided and nullified the owner's property rights, thus permitting Olson to unlawfully obtain title of the property to oust Aaronoff from her rental home. (18a, 23a, 84a-86a) Although the appellate court reversed those trial court orders as void because the trial court did not have any jurisdiction, they failed to remand the matter to the trial court to correct the void orders. (16a 28a-32a) Thus, the innocent trust property owner, who lost its property, and Aaronoff, their renter, is facing homelessness, just for attempting to seek an expanded restraining order to her three year protective order granted in 2015. (16a-18a, 23a)

Petitioner Aaronoff is being deprived of all these rights "under color of law"—i.e., by the judicial system of the State of California, which is enabling Olson's unconscionable behavior. The pretext for this unconstitutional deprivation is an inexplicable loophole in the statutory protection for litigants seeking civil harassment restraining orders -- a loophole which must be closed in the interests of justice.

As the last few years and the Me-Too movement has graphically demonstrated, no group suffers more from the lack of access to justice than poor women who are targeted by wealthy and powerful sexual predators. In the past few years, a rash of horrifying examples of such men targeting of vulnerable women have been exposed. In most of these cases, the predators do not have a romantic or domestic relationship with their victims. Thus, if these victims live in California, they are unable to avail themselves of the greater protection afforded to domestic violence victims under California law. Instead, they bear the risk of having substantial legal fees imposed on them pursuant to the civil harassment restraining order statute.

The abuse of these poor and vulnerable female victims is further exacerbated when the legal system colludes with the wealthy and powerful predator. In Jeffrey Epstein's case, in 2008, prior to his most recent prosecution, he struck a secret plea deal with a Florida prosecutor, under which he "pleaded guilty to state charges in Florida of soliciting and procuring a minor for prostitution. That allowed him to avert a possible life sentence, instead serving 13 months in a work-release program."[2] This "sweetheart deal" allowed him to escape most of the consequences of his crimes for another ten years. This clearly demonstrates that powerful men are emboldened in their wrongdoing when they are not held accountable by the legal system. Jeffrey Epstein is a

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[2] https://globalnews.ca/news/5484171/jeffrey-epstein-plea-deal-impact/#:~:text=Under%20a%202008%20non-prosecution%20agreement%2C%20Epstein%20pleaded%20guilty,to%20victims%20and%20register%20as%20a%20sex%20 (last accessed 01/04/2024)

sickening example of such a brutal and vicious predator. It is conservatively estimated that Jeffrey Epstein targeted between 80 and 100 teenaged girls for sexual abuse and exploitation.[3] The actual numbers may be much higher. According to news reports, Ghislaine Maxwell, Epstein's accomplice, boasted that she "[drove] into the trailer parks in West Palm Beach," and "look[ed] for [girls whom she knew were] Jeffrey's type" and brought them home for him to sexually abuse.[4] These girls were targeted for their poverty and vulnerability[5] similar to Aaronoff

In another egregious case, Harvey Weinstein allegedly engaged in nonconsensual sexual behavior with 87 women, ranging from requests for massages, to intimidating sexual advances, to rape.[6] None of these women could have availed themselves of the domestic violence restraining order in California, either, because they also were not in an intimate relationship with Mr. Weinstein.

The attempt to obtain a CHRO in California with its higher clear and convincing burden of proof is fraught with potentially insurmountable barriers, particularly for indigent Plaintiffs/Petitioners. These barriers are significantly more burdensome than those required for a DVRO, where the burdern of proof is the lower preponderance of evidence.

This greater burden represents a strange oversight by the California legislature—one that is demonstrably contrary to clearly-articulated California public policy.

There is no legitimate policy reason for treating CHROs so differently from DVROs. In many cases involving non-intimates, such as this one, the harasser is almost as close to home and the threats are at least as severe and life-altering as a domestic violence situation. A victim of

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[3] https://www.thecut.com/2019/07/how-many-jeffrey-epstein-victims-are-there.html.

[4] https://nypost.com/2020/05/22/ghislaine-maxwell-searched-trailer-parks-for-epsteins-girls/ (last accessed 01/04/2024)

[5] https://www.usatoday.com/story/news/nation/2019/07/09/how-jeffrey-epstein-allegedly-chose-his-sex-trafficking-victims/1683420001/ (Last accessed 01/04/2024)

[6] https://www.usatoday.com/story/life/people/2017/10/27/weinstein-scandal-complete-list-accusers/804663001/. (last accessed 12/27/2024)

harassment, who lives in the same small building, shares the same indoor and outdoor common areas, and has suffered intrusions into her private space by the harasser, is in fundamentally the same predicament as a domestic violence victim. The danger to the victim is significantly exacerbated when the harassment is sexual and violent in nature, as in this case. And yet, merely because the harasser and the victim were never involved in an intimate relationship, Petitioner was subjected to the much greater burden of proving a CHRO case.

These greater burdens for obtaining a CHRO effectively stifle the ability of indigent applicants to assert their rights to protection from harassment, stalking and sexual assault by strangers, employers, acquaintances and neighbors. Before applying for a CHRO, any rational victim of harassment would have to consider very carefully whether the risk posed by the harasser outweighs the substantial risk of being charged crushing attorney's fees, if the victim is unable to present sufficient evidence to overcome the high "clear and convincing evidence" hurdle. Moreover, the risk of losing the case due to legal error, and thus being liable for attorney's fees, is substantially increased when an indigent victim is unable to pay for an attorney and is forced to proceed *pro se*. Thus, an indigent victim seeking a CHRO is subjected to a twin risk of financial liability, which would deter any victim from attempting to obtain the protection of the law.

IV. California Law and Public Policy Require Considering Ability to Pay.

California law and public policy also recognize that due process of law is denied when a litigant is penalized with exorbitant legal fees for asserting a legitimate, good-faith claim in court, and when the court disregards the litigants' inability to pay. Since the very inception of its statehood, California has adopted legal principles, in effect in English common law as early as

the reign of Henry VII, which prevent any litigant being denied access to justice because of poverty. *See Baltayan* , 90 Cal.App.4th at 1436-39.

This policy has been articulated by California courts in multiple different contexts. It has been affirmed in the context of the requirement to post a bond before being allowed to file a personal injury action. *Baltayan*, 90 Cal. App. at 1429-31. It has also been affirmed in the context of not requiring an indigent plaintiff to prepay jury fees in order to prosecute a civil action. *Isrin v. Superior Court*, 63 Cal. 2d 153, 154-155 (1965). It was articulated by a California court as early as 1917 in the context of prepayment of legal fees. *Martin v. Superior Court*, 176 Cal. 289 (1917)

Thus, in multiple contexts, California law and public policy explicitly recognizes that lack of financial resources is often an insurmountable obstacle to access to justice, and provides remedies. *See Baltayan,* 90 Cal.App.4th at 1427 (Cal. Ct. App. 2001); *Garcia,* 174 Cal.App.4th at 464;; *Isrin,* 63 Cal 2 d at 165; *Martin,*176 Cal. at 289.

The one area in which the California legislature and the courts seem to have deviated from the State of California's long-settled and well-articulated public policy of judicial access for indigent litigants, is the failure of the law to mandate consideration of ability to pay for CHRO applicants.

V. CONCLUSION

This is an appropriate case for rehearing. This case represents a shocking miscarriage of justice in direct conflict with Due Process under the Fourteenth Amendment, which requires that indigent applicants for restraining orders in non-intimate relationships be given a fair chance to prove their need for protection without their access to justice chilled by the fear of having astronomical attorney's fees imposed upon them if they are unable to demonstrate that they meet

the CHRO clear and convincing burden of proof.

Petitioner Aaronoff has been embroiled in litigation for almost nine years, and with this Court's denial of her petition, she now faces a crippling financial penalty in the form of Respondent Olson's claim for attorney fees, fees on appeal and enforcement fees of over three million dollars ($3,000,000). All this because she attempted to protect herself from sexual assault, threats and intimidation by a rich and well-connected sexual predator.

These issues impact not only Petitioner Aaronoff's financial welfare, health and personal safety, but have a chilling effect on countless victims of sexual abuse, stalking, sexual assault and intimidation by neighbors, co-workers, acquaintances and strangers with whom they do not have intimate relationships.

In light of the above, Petitioner Aaronoff respectfully requests this Court look to "[T]he historical practice of equity, which for centuries has provided courts with the power "to protect all rights and do justice to all concerned." *Rubber Co.* v. *Goodyear*, 76 U.S. 9 Wall. 805, 807 (1869).

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AFFIDAVIT OR DECLARATION OF SERVICE

I, Norma Alcala, certify that, on this date, March 18, 2024, pursuant to Supreme Court Rule 29, I have served the enclosed Petition for Rehearing and Certificate, upon all parties required to be served by said rule, by depositing an envelope containing said documents with Federal Express with the postage pre-paid, addressed to the following person or persons:

Buchalter P. C.
Robert Little
Eric Kennedy
18400 Von Karman Ave # 800,
Irvine, CA 92612
Counsel for Respondent Curtis Olson

I declare (or certify, verify, or state) under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 18, 2024, at Sacramento, California

Norma Alcala

M. Romanishin, notary public

See attached for seal

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California
County of Sacramento

Subscribed and sworn to (or affirmed) before me on this 18 day of March, 2024, by Norma Alcala, proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.

M. ROMANISHIN
COMM. # 2328008
NOTARY PUBLIC • CALIFORNIA
SACRAMENTO COUNTY
Comm. Exp. MAY 11, 2024

(Seal)

Signature