

To: The Clerk, US Supreme Court, 1 First St. N.E.
Washington, D.C. 20543.

From: Irina Collier, Prose, IFP Petitioner,
Petition for rehearing case 23-7011
Collier v. Newsom

3729 S.W. 65th.

Gainesville, FL. 32608

650-695-9000

imbusy742outlook.com and Collier@berkeley.ca

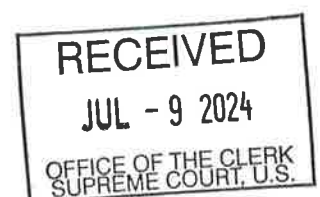
in re:

Support / latest information, that was
not available at the time of
original filing in case 23-7011

Dear Clerk,

Please file and docket additional
compelling grounds for rehearing case
23-7011, enclosed herein.

Respectfully, IC 7.3.24



MOTION TO DISMISS

Sworn statement by Prose defendant Irina Collier, case 2024-MM-1056 COMES NOW the Defendant, pursuant to Rule 3.190, Fla.R., Crim. P., and files this Motion to Dismiss (“Motion”), respectfully moving this Honorable Court to dismiss indictment, filed in the above-styled cause, and in support thereof, states as follows:

MEMORANDUM OF LAW

A.(c) (4) Law— Generally

This Motion is filed pursuant to provisions of Rule 3.190(c)(4), Fla.R.Crim. P., which provides that a motion to dismiss may be filed on the grounds that—

There are no material disputed facts and the undisputed facts do not establish a prima facie case of guilt against the defendant.

The facts, based on the eye witnesses sworn testimony, and the clear and simple reading of the trespass warning, are undisputed, and the application of the law to the undisputed facts shows that the State has not, and cannot, meet its factual, or legal, burden as to the charge. Accordingly, dismissal of the charge is appropriate.

“Rule 3.190(d) states and State v. Kalogeropoulos 758 So.2d 110,112 (Fla.2000), holds that rule 3.190(d) requires the State to specifically deny factual allegations and if necessary, add additional material facts that meet the minimal requirements of a prima facie case”. Galston v. State, 943 So. 2d 968,971 (Fla. 5th DCA 2006). Specific denials of fact are required and where the “denial was not specific,[it is] therefore...not sufficient to dispute [defendant]’s factual allegations”. Id. A trial court should grant a motion to dismiss where the State fails “to specifically deny his allegation” in traverse. Id.

“To establish a prima facie case, ‘the State must show only that a reasonable jury could find the defendant guilty of the charged crime under the most favorable construction of the evidence”. State v. Benjamin, 187 So.3d 352, 354 (Fla. 4th DCA 2016) citing State v. Yarn, 63 So. 3d 82, 85 (Fla. 2d DCA 2011).

B. Analysis of ASO’ Trespass Warning

Aside from the jurisdictional defects addressed in C below, the plain reading of trespass warning confirms the Defendant did not violate it by coming home to own residence. ASO Lieutenant Lalonde on 3.22.24. took husband’s word that he has no contact order against wife, when indeed it is the wife only who has injunction against the husband. Lieutenant also, without any research, concluded, agreeing with husband’s fabrication of the “sole ownership” of the marital-communal property under the law of Ca. where divorce is pending for more than six years, and where in rem jurisdiction, in as far as dissolution of marriage matters, is located under law. Lieutenant arrested wife for coming to her own home on the word of a domestic violence offender, which constitutes Fundamental error in the indictment, and at best a lack of following simple investigative procedure. The wife did due diligence presentation of her right to enter own house, she showed valid drivers license, stated to a Lieutenant case number of her injunction against the husband and Lieutenant disregarded her marital property and protective order— granted in Ca. and valid in every jurisdiction(Fl. s. 741.315)—rights.

FIBRS Incident Report by Lieutenant on 3.22.24. states:”I responded to an initial call of domestic dispute involving Charles Collier and his wife, Irina Collier. The complainant(C.Collier) had called dispatch to advise his estranged wife, Irina, was on the scene and had a no contact order in place”. In fact, the no contact order was issued next day, in jail, pursuant the Lieutenant’s charge of Irina with Felony Burglary at the scene of her house —3.22.24. FIBRS Incident Report— and not ever

before. Lieutenant's failure to do due diligence fact checking on the scene led to all subsequent dominos of the Due Process fall in disarray, obstructing the optics of prosecution, who in turn also failed to conduct investigation in Pima Facie case of arresting the wrong person at the scene of the crime on 3.22.24. Up until today, through all of the steps of the Fl. Due Process no-one pursued the investigation into Domestic Violence Restraining Order violation, the one with the valid no contact order against Charles Collier, who the only offender under the Fl. s. 741.315.— which renders any and all ASO action as failure to properly identify offender in Domestic Violence case 18DV000161 with active injunction from Family Court in place on 3.22.24.

C. Failure of the State to specifically deny the defendants factual allegations of her right to the property, thus rendering prosecution's information ludicrous at best and most likely malicious, [given her husband's prominent position in the city and the very fact that judges involved in this case and the prosecutors and the public defender offered by the court to the defendant — are all her husband's former law students, he is a UF law professor] is best stated in one of the Honorable Judges own words during a hearing in this case on 5.14.24., when the State suggested charge of Felony trespass and Felony Burglary [implying an owner of the house can indeed trespass and burglarize herself] then voluntarily withdrew felonies, but still insisted on keeping the case in criminal court against bewildered comments of the Judge below:

"Technically, she owns the property. Legally she owns the property"... "The[family court] judge hasn't transferred ownership to the husband, so she still owns the property that she's being trespassed on"... "I would anticipate a motion to dismiss being filed in the criminal case."

Reasonable mind of an average jury at this point would inquire as to what is really going on in court and whether they are witnesses to unambiguous case of Brady Violation and Prosecutorial Vindictiveness, seeing the case of trespass brought against the rightful owner of the property. A discerning jury is aware that the defendant has the right to bring a suit for damages against just this kind of prosecutor, if after a night in jail at 64y.o., on clearly wrong charges, defendant is still waiting for someone in Court to simply look at records in this case - contained on the docket- with Court Order from 01-2020-DR-1656- Honorable Judge Ferrero, denying all claims by Charles Collier, that he is trying to assert in fraudulent action, under Judge Ferrero's own court case number, as if it magically transformed into an "exclusive possession of property", thus turning Charles into a landlord and his wife Irina into a tenant, open to being trespassed in her home that according to Charles turned into his own castle after the married couple with a child lived in that house for 20

Years. There simply is no such law in Fl. Irina has legal right to the property, which was stated above in Judges words on record, and is confirmed in documents, docketed in this very case from the start of the injunction and dissolution of marriage case back in 2018 case : 18000161; that Lieutenant Lalonde, the State and all who chose to ignore documentation in the Clerk's office of the Alachua County Criminal and Civil Courts, are free to inspect and witness for themselves. Court Orders, transcripts of hearings, statements from Charles Collier in 2018 about communal nature of the house he claims as his own now, statements from Judge Kramer, terms of Irina Collier's protective order against her husband, and volumes of additional hard evidence attesting to Irina's unerring innocence.

D. Lack of jurisdiction.

Defence argument regarding jurisdictional defect couldn't be presented better than in the words of the same Circuit 8 Honorable Judge - expert in criminal and civil jurisprudence, when on 5.14.24. he repeated his summary of prosecutions intent to transfer from felony court to County court thusly:

"I'm not sure that they can prove the trespass against you. The charges have never been filed against you and you were arrested back in March 22nd"... "I think the State's going to have a difficult time proceeding on a criminal charge"... "I just know— as a Circuit Judge, I do rotations,

and so I've done family law for four of five years in the past. And normally this would not be a criminal case. This would be a contempt of court in front of the judge in the family law division". At this point it is prudent to note that while the Judge did not explicitly referred to what kind of contempt he referenced, it is obvious that only one spouse involved in this misdemeanor charge has a valid injunction against the other suppose— it is the wife who has a long term Domestic Violence Restraining Order [violation of this injunction is instant felony] against her husband. Husband is clearly trying to get out of facing prosecution for his injunction violation by setting up his wife with ridiculous on its face attempt to convict her for trespassing in her own house.

The Judge continued:"But I've never seen a criminal charge come out of this yet unless I transferred actual ownership to the individual"... "I just know that this appears to be a difficult criminal case to prove for the prosecution... That's just my initial reaction". " That being said, at this point[5.14.24.] you haven't been charged, and there is a possibility they never charge you, that they may dismiss the charges against you. Okay?"

In short, no prosecution lies, under this criminal statute- misdemeanor trespass.

WHEREFORE, it is respectfully requested that this Motion to Dismiss be granted.

Irina Collier, Prose Defendant in case 2024-MM-1056A

6.24.24.

2.16.24. deputy Smith "forgot"to issue trespass slip. No service ever, no case. Prizzia. County Commission. Ashley Moody 2020 Victim's Compensation documents filled out by both victims- mom and child-approved for compensation that never arrived; USHHS under Trump . DOJ- Barr. DHS. State Department March 2020. Morgans professor's students. Collier-Garbers. Who is the judge in this case married to,

///

List of all related cases

renewal of 18DV000161 Restraining Order

Good Cause: kidnapping, false imprisonments and imminent Prima Facie threats to Domestic Violence survivors in this case present necessary and sufficient grounds for requesting indefinite renewal of injunction against the violent offender of record Charles Collier.

DIRECTLY RELATED MATTERS from 2018 to 2024 IN THIS CASE ARE AS FOLLOWS:

18DV000161 Collier v. Collier, San Jose Ca. Superior Court.
 21-7285 Collier v. UC Berkeley, US Supreme.
 22-7357 Collier v. President of Stanford University, US Supreme Court.
 23-2420 Collier v. Trump, Federal Circuit Court of Appeals.
 23-2052 Collier v. USA real party of interest D. Trump, Federal Circuit Court of Appeals.
 M287263 State of Ca. v. Collier, San Diego Superior Court(2023)
 01-2020-DR-1656 Collier v. Collier (6.25.2020)
 23-167 Collier v. Trump, US District Court Fl. Northern.
 24-22 Collier v. Sabraws Et. Al., US District Court Ca. Southern.
 S282929 Collier v. Newsom, Ca. Supreme Court(2024).
 SC2024-0247 Collier v. Collier, Fl. Supreme Court.
 24-7018 Collier v. Trump, US Court of Appeals D.C. Circuit.
 24-90 Collier v. Collier, US District Fl. Northern.
 24-85 Collier v. Fl. Governor Et.Al., US District Northern.
 2024-MM-1056A State of Fl. v. Collier, Gainesville, Fl. Alachua County Court, Circuit 8.
 2024-CA-1998 Collier v. Collier, Gainesville, Fl. Circuit 8 Family Court.

All matters above have the names of two principal litigants central in them: Irina Collier v. Charles Collier. Having started in 2018 as domestic violence dissolution of marriage with a minor, it reached the phase of domestic violence child support arrearages interstate violation in Fl. 2024.

It is also directly related to a petition for rehearing pending review in the US Supreme Court on September 30, 2024: Collier v. Newsom.



Emergency Application to the Fl. Supreme Court

In re:

**The Jurisdictional Question having
Surfaced in case 24-0939 upon the US
Supreme Court's Immunity Question
Ruling July1,2024.**

**Crucial jurisdictional questions in this
case:**

- 1. Are perjury and fraud by Fl.
Government officials defined as
immune actions under the Fl.
Constitution today?**
- 2. Did professor Collier violate terms of
his injunction in chambers of Judge
DeTomasio on July 28, 2020 according
to Fl. S. 741. 315?**
- 3. Are humanists protected from
religious prosecution under the Fl.
Constitution' First Amendment freedom
of religion clause, and, is prosecution of
a humanist child by white nationalist
christian vigilantes a hate crime in Fl.?**



**Good cause for invoking
Emergency Application to the Fl.
Supreme Court, seeking answer to the
constitutional question of immunity:**

**Background in case 24-0939 zigzags
from Fl. to Ca., to Washington D.C. and
back to Fl.**

**Ca. Superior Court 2023 Judge Church
(experienced US attorney in Chief
Judge Sabraw's Ca. Southern US
District Court) presided over perjury
and fraud in chambers case. When case
was challenged as whistleblower
retaliation from Newsom, that started in
2018 and never ended, Judge Church
wrote: There may be immunity.**

**Judge Church knew and actively
participated in US Attorneys' cover up
of the Title 9 criminal violation by
professor Collier on UF campus.**

**Professor masterminded religious
involuntary reformatory re-education of**



involuntary reformatory re-education of his minor child humanist, that started in 2017 Stanford extension school, continued through UCOP: 6 years in Berkeley, moved to San Francisco, then San Diego, and now is still commanded from professor's base in Gainesville, Fl. under the Americorps umbrella. Still involuntary. City and County Commissioners know and do nothing about Anna Prizzia's role in 2020 fraud and perjury in Fl., documented in Circuit 8 on July 28, when Judge DeTomasio knowingly, willingly and in violation of Fl. Statute 741.315 ordered survivors of domestic violence-religious hate crime to get out of their own home. Trump covered everyone's action in 2020 with broad promise of complete immunity.

Case 24-mm-1056 State of Fl. v. Irina Collier [directly related to all Collier v. Collier cases in Ca. and Fl., and to the:



State of Ca. v. Irina Collier trespass cases, and to a trespass issued by University of Florida (president) to Irina Collier] is still open in Alachua County-Prizzia' territory. Anna Prizzia is a county commissioner of the zone in Gainesville Fl. where Irina and her son reside. Irina and son were unlawfully kicked out of there home in 2020. Now, the same government officials in Fl. and Ca. are getting away with Contempt of Court, classified by all clerks of all courts for 6 years straight as civil matters, while the violation of long term DV injunction is instant felony.

Judge Jones presiding over decision whether to grant Motion for Dismissal is not in any hurry to rule in clear case of perjury and fraud by the government officials in judicial chambers. She cares less about Justice , about bringing captive humanist child home, then she is secure in dragging the travesty in her



captive humanist child home, then she is secure in dragging the travesty in her own chambers as long as it takes to please professor Collier and commissioner Prizzia, or until higher Court's order in this case. No sooner, in spite of the Circuit 8 powers bestowed on her judicial robes to rule in the interests of law and Justice



From 2018 to 2024 Ca. Supreme Court stood by Trump's and Newsom's order to sweep all crimes against humanist child on territory of Ca. State and private universities, and in State and US Courts of Ca. under the carpet.

All Courts refused to answer a simple question in this case: Do the government officials, who cover-up of rapes and involuntary servitude of Court Protected humanist child have immunity for criminal acts?

Those courts have brought the case back to the home of survivors in FL.

The case poses urgent questions to the Honorable Supreme Court of FL., today, after the US Supreme Court ruled that criminal acts in any office are indeed unconstitutional. Even if committed during the official service in the office by unlawfully interspersing private criminal acts- cover up of child rape, or selling government nuclear secrets to foreign adversary for personal gain types of things, within their official duties. The black and white nature of high crimes is the concept preserved within the ruling of the High Court on 7.1.24.

Are the actions of government officials like Anna Prizzia who impersonated a Judge in Ca. considered to be official in FL., or are they criminal under FL law?, Does practicing law in a different state without a law license by a government official of FL. qualify as an immune act in FL.? FL. Constitution is not ambivalent, statutes are clear. So why are the Clerks of all Courts in FL.- State and US District failing to cure want of jurisdiction at the original tribunal level, where criminal law is turned into a civil with the inside out- upside down -twist the law on its head -maneuvering set of lies and misinformation? What Chief Judge allows it in FL? Under what constitution?

Without answers to questions of immunity this case can not be solved in FL.

Would the Honorable Court answer in the interests of Law and Justice? The original tribunal of Circuit 8 stands firmly on the side of imprisoning survivors-whistleblowers and affording the status of victim to a violent offender of record; victim and offender are simply reversed in a twist the law like a pretzel move. Motion for dismissal of the case based on perjury and fraud in chambers of circuit 8 is ignored by Magistrate Judge Jones- also a former student of the violent offender professor



Judge Jones- also a former student of the violent offender professor Collier- in 24-mm-1056A, directly related to 24-0939.

The District 1 Honorable Court': 24-0939 would inevitably be directed by this Honorable Court's answer and/or lack thereof in the above questions, affecting the lower tribunal's ability to apply the Fl. Law in case 24-0939.

Internments/Relevant history(unedited notes):

San Diego jail, Public Defender by the name Americorpsikova. Sounded odd, now makes sense in familiar mockery, she went further totally sure I'll never get out, and her cover is as solid as it gets- Sabraws in Ca, and way higher in Fl. What is higher than Chief judge of federal court and a judge in Ca.

Supreme? There isn't much room to go higher, a leap over two circuit court of appeals judges, three with one In federal circuit Washington , then just nine steps up, which step is in play here is obvious, one from Disney territory. Two Disney parks in the country. Iniminimomimoe. It was a fun game for ms.



Americorpsikova to play in jail, total immunity and impunity, absolute control over a powerless human. She didn't hide enjoyment, teased me about not knowing legal terms, assured me I'll be convicted unless plead guilty to trespassing in own rental apartment, chastised me for not listening or talking to her. A girl who could be my grandchild. She works under Nicaraguan (missionary church Garber Collier Ga., Ca. Fl.,TN.) identified rapist professor who took a plea for raping a student at Santa Cruz university- Title 9 case.

She admired "Judge Davis", fully knowing it is Prizzia : " Judge is good, plead guilty, then we'll get you out of jail".

You couldn't make a movie script like that, people will say:" it can never happen to innocent , not this way, it just is not realistic. And her son is a slave of



professor- father? Get real. And son is Mensa? Get out! And she has a Ph.D? Right! In Ca!... Berkeley, Stanford and Trump in it too? Are you nuts? Listen to ms. Americorpsikova, plead guilty and shut up".

Next I'm slammed against the wall after being tripped first by an angry deputy for refusing to enter a tiny room with a microphone. I was chained up : ankles, waist, hands, you can't walk normally, still he wanted to trip me .slam was so hard I yielded a scream before realizing what happened. Davis-Prizzia gave him orders to bring me into that room whatever it took, she was feet away, heard me scream, knew what she is doing, then ordered same entertainment again and again 3 more times always insisted I be dressed in chains up to my ears. Last order she gave to deputies was: get her out to be brought into that room even if she says she is too weak to make a very long walk in chains(wheelchairs are on every floor of confinement per regulations), Prizzia said " get her out by full extraction from a cell if she can't make a walk. Drag her out". Deputes do extractions in case of threat to their own safety in gear in team with weapons dragoutway. I asked for a book on procedures on the ward. It forbids extractions except in emergencies. Still deputies said: judge orders it we can't disobey. So I went every time, knowing Judge is most likely not there. In four months she appeared twice, while I had to get dressed in chains for her three more times for nothing- it's called dry run in jail- stay in chains in a cold waiting cell for no reason but inflict suffering. Nothing is fun in jail, more so in solitary, even more dressed in chains in holding cell from 5a.m. to at least 5p.m. unless a trip back to solitary is delayed . After the first two strip searches, Prizzia-Davis, my husband, his Morgan law Defence army Chad White, Perla, Sabraws, and all others wanted me to be strip searched after every dry run too. I made a gallows humor statement, when deputies said ~~that's what is normally done~~ . I answered if it was



searched after every dry run too. I made a gallows humor statement, when deputies said that's what is normally done, I answered if it was normal every time in every detention we'd see people's naked butts at every traffic stop and arrest on the streets too. That joke saved me from their intent. That time. Was my child saved from it in his holds? His father knows.

Chad White- the person who kidnapped my son was my victim according to Prizzia -Davis actress. He is criminal Defence attorney, his role was playing administrator in my sons and my apartment. He trespassed me in our rented apartment, said he is afraid I have a gun, didn't elaborate, just wrote a sentence in his complaint and I was thrown in jail. Prizzia' bud Chad White - Defence of my husband in case that was pending in high court - Chad said "your son is all grown up doesn't need court order protection" when I told him we are in safe@home program for survivors of DV, showed him child's safe@home card from Ca. Secretary of State. In Florida 2024 sheriffs deputies show up with Meridian staff to tell me they called Ca. to do wellness check on my son, "he is not kidnapped, he is fine"- "Chad White told us". "and you can't go to your husbands house, go to StFransis house homeless shelter or get out of the city"- February 24. Chad White is a prosecutor- moonlighting as criminal Defence, district attorney's staff in Ca., with close FI ties. Out in the open, collaborating with Kramer through court services program for placing whistleblowers in conservatorship against their will for "incompetence".

Everyone knows what Charles did to own child, that father kicked him out, that father is standing between child and mom like Hamas between Jewish families with deadly intent. No one can stop him from running own family in the ground. Why? Who protects Charles from a slap on the wrist, protects his trust fund, his undivided marital assets as if his alone, why?

The reason I refused to enter tiny room with microphone was for all the lies deputies and PDs were telling. They said: "PD is not in chambers we know you are prose, judge wants to speak to you alone, go." I went, first person I saw was PD, ~~one of the team that didn't~~ let me say: Not



person I saw was PD,— one of the team that didn't let me say: Not Guilty. I kept refusing PD under 6th amendment, they kept coming back. Lies were in chambers , in jail, it was internment and no one denied that, all else was lies. Passport carrying American in jail under misused Patriot Act— internment. No due process one.

Tortures . Unmarked ambulance run, blood pressure situation , being left alone with floridly psychotic inmate first days in jail, no deputies around only me and psycho, deputies leave their station, they are supposed to keep presence on that station.

Where to start, mattress plastic ,dirty ,thin thing torn in the middle, plastic' sharp edges jabbing in your flesh. Either that or sleep on bare metal. Smell of mattress was sensory "treatment." If you ask for access to anything all other inmates have like law library or calling court , deputies just laugh, if you ask what is my charge why am I here - the same nonsense answers with the same : "talk to PD only", all were ordered to give nonsense answers, or none: "You have domestic violence charge." I'd ask against whom, they answer Chad White. He is not my husband and domestic violence is family court, I'm not married to Chad, never had family law injunction. I'm protected with one. And that continued every week when classification made rounds. They had answers but only smiled when I asked .

Most deputies didn't torture, all it takes is one, there were more than one who did, with a smile or smirk, if they knew wrists hurt already bruised from handcuffs put chains and cuffs even tighter, all knew I'm in constant pain , arthritis aggravated by conditions. Some made is so unbearable my limp came back, walking was harder and harder. But there were others too, they loosened chains and sent my letters to courts. Courts took time to answer past deadlines or ignored me. Nothing was worse than knowing child has it the same, different scenario but captive, has to survive, knowing mom may not.

Order-Order.pdf

Open in Acrobat



Done



DISTRICT COURT OF APPEAL, FIRST DISTRICT
2000 Drayton Drive,
Tallahassee, Florida 32399-0950
Telephone No. (850) 488-6151

July 3, 2024

Irina Collier,
Appellant(s)

Case 1D2024-0417
L.T. No.: 01-2024-DR-533

v.

Charles Collier,
Appellee(s).

BY ORDER OF THE COURT:

Appellee has failed to timely serve an answer brief. Appellee shall serve an answer brief within ten days from the date of this order. If Appellee fails to serve an answer brief within the ten days, this case will be presented to the Court for consideration without an answer brief.

I HEREBY CERTIFY that the foregoing is a true copy of the original court order.

Served:
Charles Collier
Irina Collier

DS

~~1D2024-0417~~ July 3, 2024
Kristina Samuels, Clerk
1D2024-0417 July 3, 2024



**Additional material
from this filing is
available in the
Clerk's Office.**