

Original

No. **23 - 7282**

FILED

APR 16 2024

OFFICE OF THE CLERK  
SUPREME COURT, U.S.

---

**IN THE  
SUPREME COURT OF THE UNITED STATES**

---

*JEFF BAOLIANG ZHANG, PH.D.*

*Petitioner/Appellant,*

*v.*

*Los Angeles County/Twin Tower Correction Facility*

*Defendants/Respondents*

---

**On Petitioner for Review from the Ninth Circuit Court**

**(Case #23-55353)**

**April 15, 2024**

---

**PETITION FOR REVIEW**

---

JEFF BAOLIANG ZHANG, PH.D., *Pro se*

P.O. Box 41272

LOS ANGELES, CA 90041

Telephone: 213-436-9390

Email: [zjeff8811@gmail.com](mailto:zjeff8811@gmail.com)

## **QUESTIONS PRESENTED**

- (A) Respondents/Defendants willfully refused to help a seriously wounded man at county jail, but the US District Court for the Central District of California and the Ninth Circuit all took such violations as frivolous. Why do these federal court judges behave so inhumanly as to take horrible human rights violations as nothing?
- (B) Respondents/Defendants did not allow Petitioner to have a different attorney for the criminal case and blocked all my communication at county jail throughout my detention time. These federal courts also took such violations as frivolous. What kind of bizarre laws do they practice at the federal courts?
- (C) Why can the Central District Court of California and the Ninth Circuit openly violate the Bill of Rights in the US constitution and the Civil Rights Act of 1964 to use double standards in ruling a case based on race, national origin, political belief, social-economic status, and age? Who allowed them so inhumanly to deal with the less advantaged class?

## **PARTIES TO THE PROCEEDING**

Jeff Baoliang Zhang, Ph.D., Petitioner on review, was the Plaintiff-Appellant below.

Los Angeles County/Twin Tower Correctional Facility was the Defendant-Appellee below.

## **RELATED PROCEEDINGS**

The following proceedings are directly related to this petition:

- Jeff Baoliang Zhang, Ph.D. v. County of Los Angeles, et al.

No. 2:22-cv-08365 (U.S. District Court for Central California, Los Angeles )

- Jeff Baoliang Zhang, Ph.D. v. County of Los Angeles, et al.

No. 23-55353 (U.S. Court of Appeals for the Ninth Circuit)

## TABLE OF CONTENTS

<b>QUESTIONS PRESENTED .....</b>	<b>ii</b>
<b>PARTIES TO THE PROCEEDINGS .....</b>	<b>ii</b>
<b>RELATED PROCEEDINGS .....</b>	<b>ii</b>
<b>TABLE OF CONTENTS .....</b>	<b>iii</b>
<b>TABLER OF AUTHORITIES .....</b>	<b>vii</b>
<b>STATEMENT OF THE CASE .....</b>	<b>1</b>

**The Key Issue: The Lawless Respondents Helped the Chinese Communists in Persecution against Petitioner, a China Democracy Advocate, but the U.S. District Court and the Nineth Circuit Willfully Took Such Serious Civil Rights Violations as Frivolous**

<b>NECESSITY FOR REVIEW .....</b>	<b>1</b>
<b>OPINIONS BELOW .....</b>	<b>2</b>
<b>JURISDICTION .....</b>	<b>2</b>
<b>STATUTORY PROVISIONS INVOLVED .....</b>	<b>2</b>

### **United States Constitution**

Amendment I, VIII & XIV

### **Federal Statutes**

42 U.S.C. § 1983 – Civil action for deprivation of rights

<b>FACTUAL STATEMENT .....</b>	<b>2</b>
--------------------------------	----------

#### **A. The US District Court for the Central District of California**

**Cheated and Oppressed Petitioner while**

**Respondents/Defendants Cannot Use Their Lies Anymore**

<b>B. Corrupt George Wu and Pedro Castillo at District Court Refused to Disqualify Themselves Despite My Repeated Demands .....</b>	<b>8</b>
<b>C. The Double Standards in Ruling Petitioner’s Case .....</b>	<b>11</b>
<b>D. Reason for Granting Appellant’s Appeal .....</b>	<b>12</b>
<b>Conclusion .....</b>	<b>13</b>
<b>CERTIFICATE OF WORD COUNT .....</b>	<b>14</b>
<b>PROOF OF SERVICE .....</b>	<b>15</b>

## **APPENDIXES**

<b>A. Corrupt George Wu’s Order at US District Court for the Central District of California .....</b>	<b>app. 1-2</b>
<b>B. Judgment, US District Court for the Central District of California .....</b>	<b>app. 3</b>
<b>C. Ninth Circuit Order .....</b>	<b>app. 4-5</b>

## TABLE OF AUTHORITIES

### ***United States Constitution***

Amendment I .....	5
Amendment VIII .....	passim
Amendment XIV .....	passim

### ***Federal Statutes***

42 U.S.C. § 1983 – <b>Civil action for deprivation of rights</b> .....	passim
--	--------

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, (R.S. §1979; Pub. L. 96-170, §1, Dec. 29, 1979, 93 Stat. 1284; Pub. L. 104-317, title III, §309 (c), Oct. 19, 1996, 110 Stat. 3853.)

Federal Law <b>Rule 2.3: Bias, Prejudice, and Harassment</b> .....	9
--	---

(B) A Judge shall not, in the performance of judicial duties, by words or conduct manifest bias or prejudice, or engage in harassment, including but not limited to bias, prejudice, or harassment based upon race, sex, gender, religion, national origin, ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation, ...

<b>28 U.S.C. § 455 – Disqualified of Justice, Judge</b> .....	10
---	----

Any Justice, judge, or magistrate judge of the United States shall disqualify himself in any proceeding in which his impartiality might be reasonably questioned ...

<b>President Theodore Roosevelt .....</b>	<b>12</b>
---	-----------

**No man is above the law and no man is below it; nor do we ask any man’s permission when we ask him to obey it. Obedience to the law is demanded as a right, not asked as a favor.**

### ***California Rules of Regulations***

<b>... misuse of the power of the court; it is an act done in the name of the court and under its authority for the purpose of perpetrating an injustice. [Citation] (S. A. Madison 2014) 229 Cal. App. 4<sup>th</sup> 27, 41.) .....</b>	<b>10</b>
---	-----------

<b>The Honorable Diego Garcia-Sayan, United Nations <u>Special Rapporteur on the Independence of Judges and Lawyers</u> stated in his writing, “Corruption, Human Rights, and Judicial Independence” .....</b>	<b>11</b>
--	-----------

### **Corruption in the Judicial System**

**Corruption undermines the core of the administration of justice, generating a substantial obstacle to the right to an impartial trial, and severely undermining the population’s trust in judiciary.**

**Illicit interferences with justice can also be violent, particularly when perpetrated directly by members of organized crime. These forays are intended to secure specific objectives, such as the closing of a particular case, or the acquittal of a given individual.**

*(United Nations, A/72/140.35 July 2017.)*

### **Cases**

<b>S. A. Madison 2014) 229 Cal. App. 4<sup>th</sup> 27, 41. ....</b>	<b>10</b>
--	-----------

## **NECESSITY FOR REVIEW**

Review is necessary to protect human life for the authority of the United States Constitution and certain Federal Laws, to legally punish the terrible persecution against a US citizen by a pack of sheriffs in a county jail who assisted the Chinese communists in the criminal case for their monetary gains, and to stop the horrible cheating and oppression to a citizen by the public employees. The US Supreme Court should stop the immense corruption in the US District Court and at the Ninth Circuit. Laws and justice should be applied in this case filled with federal civil rights claims. Both the Defendants and these corrupt judges have turned California into a fascist state to serve the interest of a foreign dictatorial regime and for their own benefit.

## **OPINIONS BELOW**

The Ninth Circuit for Appeals (Case No. 23-55353) made its order to deny my forma Pauperis status for being frivolous on February 23, 2024 (see **Appendix A.**)

The US District Court for Central District of California made its order to deny my Complaint on the ground for “not taken in good faith and revoked appellant’s in forma pauperis status” on March 27, 2023 (Case No. 2:22-cv-08365-GW-PVC) (see **Appendix B.**)

## **JURISDICTION**

The Ninth Circuit denied my appeal for being frivolous on Feb. 23, 2024, denying the Petition for Review. Petitioner invokes this Court’s jurisdiction under 28 U.S.C. § 1254(1).

## **STATUTORY PROVISION INVOLVED**

### **United States Constitution:**

Amendment I, VIII, XIV

### **Federal Statutes:**

42 U.S.C. § 1983 – Civil action for deprivation of rights

## **FACTUAL STATEMENT**

### **A. The US District Court for the Central District of California**

#### **Cheated and Oppressed Petitioner while**

#### **Respondents/Defendants Cannot Use Their Lies Anymore**

In my **COMPLAINT** dated November 16, 2022, to the US District Court for the Central District of California, Petitioner stated that Defendants violated Amendments I, VIII and XIV of the US

# Petition for Review

To: THE HONORABLE CHIEF JUSTICE AND TO THE HONORABLE ASSOCIATE JUSTICES OF THE  
**UNITED STATES SUPREME COURT:**

Petitioner, JEFF BAOLIANG ZHANG, PH.D. petitions this Court for a review to the decision filed on February 23, 2024 at Ninth Circuit Court, denying review of Petitioner's appeal for the reversal of the unlawful decision at US District Court for the Central California on the following ground:

The denial decision from the Central District Court of California is bogus as it willfully ignored the serious federal law violations by the Respondents by taking such violations as frivolous due to the corruption at Central District Court and then approved by the Ninth Circuit.

## STATEMENT OF THE CASE

**The Key Issue: The Lawless Respondents/Defendants Helped the Chinese Communists in Persecution against Petitioner, a China democracy advocate, without any human sense during my detention at the county jail for a bogus criminal case but the Central District Court of California deceived and oppressed Plaintiff as the Court declared all such violations are frivolous. Such a ridiculous verdict is also approved by the Ninth Circuit.**

In my **COMPLAINT** dated November 16, 2022, to the Central District Court, Petitioner stated that Defendants violated Amendments I, VIII and XIV of the US constitution and 42 U.S.C. § 1983 – deprivation of civil rights as Appellant listed four causes of actions about civil rights violations. This is a case about how a pack of sheriffs in Los Angeles County jail, Twin Tower Correctional Facility, abused their police power to willfully harm an innocent man to serve the interest of the Chinese communist regime, the real opponents in my criminal case BA391915 at Los Angeles County Superior Court, Criminal Justice Center. During the time when I was locked up in the county jail from Dec. 2011 to Oct. 2015, Petitioner was tortured with premeditated murder plots and other lawless conduct. In March 2013, after Petitioner was seriously assaulted by a rogue inmate, the jail sheriff refused to take care of me. There were other willful maltreatments to deprive the Petitioner of constitutional rights. However, Judge George Wu and Magistrate Pedro Castillo at the US District Court declared all such lawless conduct for being frivolous so they denied my Complaint on March 27, 2023. Petitioner appealed at the Ninth Circuit. However, Fernandez, Nguyen and Owens approved such a lawless and bogus judgment. Clearly, they used double standards in dealing with the Petitioner's case. They placed the lawless sheriff above the law and forced Petitioner to stay below it. There is no law and justice for the case at the two federal courts. In fact, George Wu and Pedro Castillo are only swindlers in judicial uniforms to oppress an innocent victim, Petitioner for this case. Then, oddly enough, the three judges at the Ninth Circuit would approve such unconstitutional decisions at the Central District Court for California.



constitution and 42 U.S.C. § 1983 – deprivation of civil rights as Petitioner listed four causes of actions with some detailed information as follows:

### **FIRST CAUSE OF ACTION - 42 U.S.C. CIVIL RIGHTS VIOLATIONS**

#### **A Premeditated Vicious Attack - Intentional Tort and Willful Negligence**

For such a severe head injury from a premeditated violent attack, Appellant suffered a lot of pain, complained about the rogue inmate, and wanted to see the doctor. But there was no medical assistance. Defendants DOES at the Facility did not let a doctor see Appellant and they did not send Appellant to the outside hospital for emergency care. It was a violation of Amendment VIII, which prohibits “**cruel and unusual punishment**” to Appellant at the time when Appellant needed medical treatment for the severe pain. It was also **elder abuse** as Appellant was 69 years old when I received such a vicious attack without medical treatment.

Appellant continued to suffer and complained about the head injury but Appellant waited for 50 days before a neurologist had a look and found the serious numbness on Appellant’s head. Such a longtime neglect of checkup or treatment revealed the intentional tort and willful negligence by the Defendants’ Sheriff DOES at the Facility towards an injured senior citizen, the Appellant. It was a continuation of **violation of Amendment VIII**. It was also **elder abuse**.

After the neurologist found serious numbness in my head, Defendants’ Sheriff DOES would not take care of Appellant anymore. Defendants’ staff at the Facility would not let Appellant see the doctor for a second time to check the nerve injury or the serious numbness problem. Appellant requested for further checkups and treatment many times but Defendants’ clinic at the Facility always ignored Appellant while Appellant suffered continuously.

After Appellant was sent to the state prison in late October 2015, due to the continuous numbness, Appellant filed many CDCR Healthcare 7362 and CDCR Healthcare 602. There were some examples as Appellant filed many more. Appellant lists them for the Exhibit to tell that Appellant not only suffered immensely at the Defendants’ jail but afterwards continued to suffer in the state prison for the head injury. CDCR did not want to let a neurologist check it. They also refused to take care of it for a purpose.

From such a horrible experience, Appellant could see at that time that such a violent attack was premeditated by some evils working for the Chinese communists. An inmate told Appellant that such kind of violent attack at a man’s temple could kill the victim. Such a sudden and vicious attack aimed at killing Appellant or making Appellant disabled mentally for life. If there was a more serious injury inside the head, Defendants’ DOES such willful neglect for medical treatment would make Appellant die that day in Defendants’ jail. It was intentional tort with deadly means against the Appellant.

Afterwards, Defendants' DOES continued to ignore Appellant's serious sufferings before Appellant left the county jail in Oct. 2015.

Such a vicious assault was premeditated as it was also based on the timing. At that time, Appellant returned to county jail and was scheduled to get released from the Defendants' jail. To stop the release, such a horrible incident thus suddenly happened to Appellant.

Besides, Appellant was denied medical treatment in Defendants' jail. Further, the vicious attacker was never charged with the crime and he was safe all the time. Therefore, Defendants' Sheriff DOES seriously violated **Amendment VIII** with cruel and unusual treatment. Defendants violated **Amendment XIV** regarding my life and liberty. It was not until May 2020 when Appellant saw a neurologist at Atascadero State Hospital (ASH) for the second time checkup and came to know that it would still take time to cure the numbness problem.

### **SECOND CAUSE OF ACTION - 42 U.S.C. CIVIL RIGHTS VIOLATIONS**

#### **Illegal Blocking the Appellant's New Attorney - Deprivation of My Choice for an Attorney**

As set forth above, Defendants' staff at the Facility prevented Appellant's new attorney from coming to see Appellant. Such an illegal and brutal act violated the basic human rights of an inmate. Appellant lost the chance of hiring a reasonable attorney. As a result, Appellant was unable to get back freedom due to the lack of fair representation. Defendants' DOES at the Facility violated **Amendment One** for my freedom in choosing a different attorney in my criminal case, and in **Amendment XIV** which prohibits abridging the privilege of a citizen in having a desired attorney for legal assistance.

### **THIRD CAUSE OF ACTION - 42 U.S.C. CIVIL RIGHTS VIOLATIONS**

#### **The Willful Blockage of Appellant's Communication - Deprivation of My Freedom for Communication**

Although there was no court restriction order for Appellant's communication, Appellant could not have phone calls and mails in Defendants' jail Facility. Such a blockage of communication seriously violated Appellant's civil rights. It lasted all the time when Appellant was locked up at Defendants' jail with other torture to Appellant. Such willful conduct violated **Amendment One** for personal freedom and **Amendment XIV** for the privilege of my personal communication.

### **FOURTH CAUSE OF ACTION - 42 U.S.C. CIVIL RIGHTS VIOLATIONS**

#### **Elder Abuse – Torture and Maltreatment at Appellant's Senior Age**

All these intentional hardships happened at Appellant's senior age. Appellant was 67 years when I began to be locked up in Defendants' County jail in 2011. Appellant got extra and immense sufferings. Appellant almost lost hope for life in the face of such continuous torture and maltreatment. It was by luck that Appellant was alive to leave the county jail in Oct. 2015 and then finally got of the mental hospital ASH in July 2020 alive. (Complaint to US District Court, pp. 9-12.)

After Petitioner made these Causes of Action for this lawsuit, Petitioner continued to give **Summary for Violation of the US Constitution and Other Federal Laws** as follows:

From the time when Appellant got viciously assaulted, Defendants refused to let me see a medical doctor. Appellant waited for 50 days with immense sufferings and then only got one chance to see the neurologist to check the serious head injury. Such lack of necessary medical treatment was a wanton violation of **Amendment VIII** as Defendants' DOES brought "**cruel and unusual punishment**" to Appellant all those years at Defendants' jail. It was also a serious violation of **Amendment XIV** regarding my life and safety in Defendants' County jail.

Defendants' Sheriff DOES prevented my new attorney from seeing me. Defendants' Sheriff DOES made serious violation of **Amendment One about my freedom of choice** for a different attorney. It was also a serious violation of **Amendment XIV about my life and liberty**.

Defendants' Sheriff DOES blocked my communication all the time. Appellant was isolated and thus could not get effective assistance from the outside world. It was a serious violation of **Amendment One about my freedom in communication**. It was also a denial of my privilege in **Amendment XIV**.

With such cruelty and immense harm to Appellant made by Defendants' Sheriff DOES at TTCF, Defendants' staff have seriously violated **Amendment I for abridging the freedom of speech as Defendant did not allow Appellant for free communication, and for a different attorney**. Defendant DOES at TTCF violated **Amendment VIII** as they enforced "**cruel and unusual punishment**" on Appellant with such vicious attack and lack of medical treatment, which "**abridge the privilege or immunities**" of Appellant, a citizen of the United States.

Defendants' Sheriff DOES deprived Appellant of "**life, liberty, or property without due process of law.**" Defendants' Sheriff DOES denied to Appellant "**within its jurisdiction the equal protection of the laws**" in a law-enforcement agency, namely TTCF. Such conduct was prohibited in **Amendment XIV**.

All these serious violations by Defendants' Sheriff DOES at TTCF have filled this civil case and they brought immense harm to Appellant. Such persecutions made Appellant suffer

all the time in Defendants' County jail and have brought serious harm and trauma on Appellant both mentally and physically to this day.

Defendants' Sheriff DOES have treated Appellant, a China democracy advocate as a violent felon for **"America Most Wanted"** in their county jail in these five years from Dec. 2011 to Oct. 2015. For their big monetary reward from the Chinese communists, Defendants committed many serious federal civil rights violations prohibited in US constitution as thus set forth throughout this case. (See pp. 12-15.)

Right after these statements, Petitioner mentioned that Respondents/Defendants **Seriously Violated 42 U.S.C. §1983 – Civil action for deprivation of rights** and mentioned the elder abuse. Petitioner cited 42 U.S.C § 1983 to remind Respondents of their serious violation of the law,

**Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, ... (R.S. §1979; Pub. L. 96-170, §1, Dec. 29, 1979, 93 Stat. 1284; Pub. L. 104-317, title III, §309 (c), Oct. 19, 1996, 110 Stat. 3853.)**

Respondents/Defendants willfully subjected Petitioner/Appellant **within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws,"** therefore, Defendants **"shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress."** Such facts are stated clearly in my Complaint but Magistrate Castillo willfully ignored them all as he did not want to apply federal laws in any of my cases. Petitioner stated such facts with the four Causes of Actions, but both Castillo and Wu acted as if they were blind people to ignore them all. The Report and Recommendation (R&R) by Castillo was filled with Defendants' nonsense, but it "became the final order of the Court." From my judicial experiences, Petitioner must say that Castillo is too corrupt, so he only made much nonsense in R&R. George Wu is very corrupt, so he quickly approved such an R&R. That is the cause why there is no law and justice for this civil case till this date. Both the magistrate Castillo and the judge Wu at this Central District Court of California are duet pranksters as they only want to please the lawless Defendants, they take this civil case as a game play. They enjoy their corruption and they follow the wings of power while they cheat and oppress Appellant at their will. They should all be impeached at a federal court.

Petitioner stated in the Complaint,

Defendants' Sheriff DOES willfully brought tremendous harm to Appellant at my elder age, Defendants' Sheriff DOES created the serious harm to Appellant in the county jail and then forced Appellant to get so many years' head sufferings without treatment.

Defendants' DOES illegally detained Appellant's new attorney when Appellant wanted very much to get his help for a fair trial. Defendant blocked my communication. Defendant Sheriff DOES made power abuse to an innocent elder citizen. All were serious violation of **42 U.S.C. §1983** at the time when Appellant was helpless in Defendants' Facility when my wife in China was blocked by the Chinese communists from coming to see me.

Defendants' Sheriff DOES stayed above the United States constitution to bring deadly harm to Appellant, an innocent senior citizen who was heatedly after by the vicious Chinese communist agent bandits for life. As mentioned, all facts revealed that it was a premeditated attack with the attempt to kill or to disable Appellant due to the criminal case created by the Chinese communist agents. Such nerve injury seriously harmed Appellant's daily life for quite a few years. The prevention of my new attorney created a big problem for the Appellant in the criminal case as Appellant could not seek laws and justice. Appellant did not get back my freedom until after August 2021. The prevention of my communication made Appellant lose precious chances of seeking some effective legal assistance. Without legal assistance, Appellant was willfully cheated and oppressed by the evils in my criminal case.

All these violations brought immense miseries and have left a serious trauma to Appellant as the suffering and hardship often came to my mind and may continue. Appellant could not understand these public employees who all have a mission statement to work for US constitution and for American public but they have loved to work for the Chinese communists. Defendants' Sheriff DOES at TTCF brought tremendous sufferings to Appellant in all those years. "Money makes mare go." These evils persecuted Appellant in exchange for their financial gains. Appellant could not find another cause for their vicious persecution against me.

In these parts, Petitioner stated that Respondents worked for the Chinese communists to persecute a China democracy advocate and a senior US citizen to get the monetary reward from the Chinese communists. Respondents brought serious and immense harm to innocent Petitioner and they seriously violated the US constitution and certain federal laws in Petitioner's criminal case. Therefore, there is nothing frivolous in such a civil case filled with federal civil rights claims.

However, both Judge George Wu and the Magistrate Judge Pedro Castillo at the US District Court who once took charge of my criminal case before are now again very corrupt in this civil case. (At start, this case was assigned to another judge when Petitioner filed the Complaint at the Central District Court. These two corrupt judges grabbed the case from the other judges to sabotage this case. It seems that this District Court has such a mechanism as to designate George Wu and Pedro Castillo who are specialized in ruining a particular case such as mine. Later when Petitioner filed another case at the District Court, these two corrupt judges immediately took hold of it and denied it quickly with the same alibi for this case. After Pedro

Castillo wrote a bogus R&R to defend the lawless Defendants, George Wu quickly issued order to deny my Complaint on the ground for “not taken in good faith and revoked appellant’s in forma pauperis status” on March 27, 2023. Petitioner knew well about their corrupt conduct; thus, Petitioner wrote a few Affidavits demanding they should get away from my case, but they only wanted to mess up and revoke this case to help the lawless Defendants. Therefore, in my Opening Brief to the Ninth Circuit, Appellant stated such a serious problem in Part **D. The Terrible Corruption at the District Court**. But the Ninth Circuit approved such corruption at the Central District Court of California. American democracy means cheating and oppression to the innocent, less advantaged class in these federal courts.

## **B. Corrupt George Wu and Pedro Castillo at District Court Refused to Disqualify Themselves Despite My Repeated Demands**

These two judges at the District Court have a very negative record for corruption in the past. In the document that Petitioner filed **PLAINTIFF’S AFFIDAVIT: REQUEST/DEMAND TO HAVE A DIFFERENT JUDGE AND A DIFFERENT MAGISTRATE JUDGE FOR THIS CASE**” dated 11-30-2022 at the District Court, Petitioner mentioned the unreasonable acts at the state courts for the criminal case, Petitioner then stated,

When it came to appeal at this court in Oct. 2018, Judge George Wu took charge of the case. In early 2020, Pedro Castillo was assigned as the magistrate judge. However, these judges only wanted to follow the wings of power. They refused to apply laws and justice for this case filled with civil rights violation. ...

... Until April 2021, by chance, Plaintiff learned that the case was already denied by Judge George Wu on 1/11/21. The Judge denied my case on the ground that it was frivolous. Plaintiff was persecuted against by a group of evils working for the Chinese communists for the two counts of violent felony that Plaintiff did not commit. This federal district court judge was absurd to deny the case in such a lawless way. Later he changed to accept Report and Recommendation (R&R) but the R&R was a void and nonsensical report that had no legal ground. It only helped the lawless group backed up by the Chinese communists.

What’s more, after George Wu made the verdict, Magistrate Pedro Castillo played a game as he did not send the ruling decision to my correct address although it was stated in the case record on 1/5/2021. In such a way, he willfully made Plaintiff lose the time for appeal. Afterwards, both George Wu and Pedro Castillo did not assist Plaintiff for the certificate of appealability to appeal at the higher court. George Wu even opposed my *forma pauperis* status for the appeal to the 9<sup>th</sup> Circuit when Plaintiff was poor and helpless. ...

Petitioner repeatedly pointed out their corruption at this federal court,

In the document of **PLAINTIFF'S AFFIDAVIT**, Appellant cited laws to demand the disqualification of these two Judges. Since they ignored my legal demand, later, Appellant continued with such a demand in a few documents but these corrupt Judges are impudent as they would not leave this case. They continued to cheat and to oppress Appellant again and again. As before, they have strong prejudice and discrimination because Appellant is a senior citizen as well as a China democracy advocate with Asian origin but without money and power.

Thus, shortly after these judges made an unlawful ruling to deny all my motions for the civil case, Petitioner filed **"PLAINTIFF'S STRONG OPPOSITION TO THE TWO JUDGES' WILLFUL ORDERS FOR THE CASE"** on January 20, 2023. Petitioner pointed out,

As a victim of judicial corruption, Plaintiff wished there should be some fair judges working for the case. But the reality is the reverse. These corrupt judges are not welcome to rule for this case because they let Defendants stay above the law of the United States. Besides, they also stay above the laws themselves as they not only committed corruption but also refused to leave this case when they are demanded to quit. Plaintiff gave ample facts about their misconduct in the past and that they should stay away from this civil case, but as a federal district court judge and as a magistrate judge, they do not want to obey the federal laws to disqualify themselves. They only want to continue with their corruption in this case. After they denied the three Motions, as before, Wu will approve all the distorted facts and nonsense in Defendants' documents, while he will deny everything from Plaintiff' rebuttals. (See pp. 6-7.)

Appellant strongly opposed their past and present conduct for the case but they continued to oppress Appellant. After Plaintiff filed that document, the R&R indicated to Appellant that Pedro Castillo still loves to cheat and to oppress Plaintiff. Castillo thus gave a lot of trouble to Appellant for this civil case. His R&R serves as another ugly example for his wanton cheating. He shut his eyes at all the indisputable facts in my Complaint while he adopted all the nonsense in Defendants' Motion to dismiss. Then, like duet pranksters, George Wu soon approved it. His Order and Judgment are all unlawful (See Exhibits A & B attached to Brief.)

Thus, after Castillo willfully made excuses with different inapplicable citations to support Defendants' distorted facts, George Wu fully approved all the nonsense in the R&R. Such a bogus R&R, and lawless Judgment can only serve as new evidence of their serious violation of **Amendment XIV of United States Constitution** at a federal district court.

#### **Federal Law Rule 2.3: Bias, Prejudice, and Harassment**

**(B) A Judge shall not, in the performance of judicial duties, by words or conduct manifest bias or prejudice, or engage in harassment, including but not limited to bias, prejudice, or harassment based upon race, sex, gender, religion, national origin,**

**ethnicity, disability, age, sexual orientation, marital status, socioeconomic status, or political affiliation, ...**

These corrupt judges dared to cheat and to oppress me because of my race, national origin, ethnicity, age socioeconomic status, and political affiliation. They insisted on their corruption and they are in fact a pack of swindlers and pranksters at the federal courts. They are devils to the less advantaged class in this country including Petitioner for this case.

**28 U.S.C. § 455 – Disqualified of Justice, Judge stated,**

**Any Justice, judge, or magistrate judge of the United States shall disqualify himself in any proceeding in which his impartiality might be reasonably questioned ...**

These two federal judges shut their eyes at my repeated quote for this federal law in my documents which demands that they should get out of this civil case. They have been hostile and shameless before Petitioner with their lawless conduct. Their prejudice is that because Defendants are public employees who are represented by powerful County Clerk, these two so-called judges thus defied laws to assist them with all their might against the pro se litigant in forma pauperis. Their willful ruling about this case must be condemned because it is “... **misuse of the power of the court; it is an act done in the name of the court and under its authority for the purpose of perpetrating an injustice.** [Citation]” (*S. A. Madison* 2014) 229 Cal. App. 4<sup>th</sup> 27, 41.)

For conclusion of this part, Petitioner pointed out,

As a victim of judicial corruption for this case till this date, Plaintiff wishes to have some fair judges at 9<sup>th</sup> Circuit working for this case. These corrupt judges let Defendants stay above the law of the United States. Meanwhile, they have abused the judicial power to force Plaintiff to stay below the law as a subhuman, the same treatment that Plaintiff received while I was locked up in TTCF for a bogus criminal case.

Such corrupt judges stay above the laws as the overlords themselves as they not only abused the judicial power to make absurd rulings but also refused to leave this case when they are strongly disqualified and demanded to quit. They refused to stay away from this civil case because they want to bring more harm to Appellant. Castillo thus cut my time short for opposing his nonsensical R&R. Wu was eager to dismiss the case. He even did not wait 14 days for Defendants to make a response to my Strong Opposition as he knew well that Defendants could not say anything lawful. In fact, my Complaint and other three documents mentioned above are enough to oppose his nonsensical R&R, and to expose George Wu’s strong prejudice and discrimination against Appellant. Their such lawless acts well revealed that as judges at a US district court, they refused to provide “**equal protection of the laws**” to the underprivileged class in California such as Jeff B. Zhang, Ph.D., a senior citizen as well as a China democracy advocate. Like the corrupt judges at the state courts, they love the Chinese communists and the lawless



Defendants who have money and power. This is the basic cause for why this case cannot get laws and justice till this date.

(See pp. 32-37 in Appellant's Opening Brief to Ninth Circuit.)

For the Part E. **Defendants Have Admitted All Their Illegal Conduct in the Criminal Case**, Appellant stated such an indisputable fact for my criminal case,

In early November 2022, Appellant filed my Petition to the US Supreme Court for the criminal case BA391915 about the illegal detention and about the terrible misconduct by the government agencies including Defendants. Appellant also condemned the terrible judicial corruption including these two judges at the US District Court. As a requirement, all the defendants in my Petition must give their response to the US Supreme Court. However, on Nov. 9, 2022, California Attorney General Office, representing all the defendants filed WAIVER (see Exhibit B) as response to my Petition to the US Supreme Court.

**California Department of Justice did not use the excuses such as being "frivolous" from George Wu and the other alibis by Defendants as the basis to argue or to deny my Petition.** Therefore, it is illegal that Castillo and Wu still made the nonsensical R&R and Judgment to deny this civil case, which was filed based on the criminal case. Such a judgment goes totally not only against the Bill of Rights but also against the WAIVER issued by the California Department of Justice representing the will of Attorney General. It is thus invalid and illegal for this civil case. ... (See p. 37.)

### **C. The Double Standards in Ruling Petitioner's Case**

The Cause for unable to get laws and justice at the US District Court for the Central District of California and at the Ninth Circuit lies in such a fact: these court Judges all adopted double standards in ruling my case.

Plaintiff is of Asian origin, born in China, a senior citizen, a China democracy advocate, and a *pro se* litigant due to financial constraint, so without an attorney. But Plaintiff holds a doctoral degree, so I know their dirty tricks. While the Respondents are a pack of lawless and inhuman cops, now backed up by County of Los Angeles, and hired sly attorneys who know how to play tricks. Such differences made these judges at the District Court and at the Ninth Circuit do not want to work for laws for this civil case. They thus used double standards in ruling this case which is a serious violation of the Federal Civil Rights Act of 1964 as it forbids discrimination based on race, national origin, political belief, age, and other factors. Such corruption at these two federal courts goes directly against the many rulings of the US Supreme Court.

The Honorable Diego Garcia-Sayan, United Nations Special Rapporteur on the Independence of Judges and Lawyers stated in his writing, "Corruption, Human Rights, and Judicial Independence":

## **Corruption in the Judicial System**

**Corruption undermines the core of the administration of justice, generating a substantial obstacle to the right to an impartial trial, and severely undermining the population's trust in judiciary.**

**Illicit interferences with justice can also be violent, particularly when perpetrated directly by members of organized crime. These forays are intended to secure specific objectives, such as the closing of a particular case, or the acquittal of a given individual.**

*(United Nations, A/72/140.35 July 2017.)*

Such immense corruption at a US District Court is a strong shame to the US court system. These judges willfully violated the federal laws to impose injustice on any case. They love to work for powerful officials so they illegally gave extra privileges to these people in a different class.

In face of such impudent and wanton pseudo judges at a federal district court, Plaintiff pointed out in the documents to the US District Court in February 2023:

**Hey, corrupt judges, you can do whatever you want to this case. As a doctor in a life science, Plaintiff has no interest to play with your corruption. You can deny everything from Plaintiff for the case now. But you are forever on the shameful monument for your impudence, deception, and corruption in the American judicial system.**

This paragraph gives the expression from the bottom of my heart. But they are still impudent as they refused to disqualify themselves. They thus issued a bogus order to deny the case. Petitioner appealed to the Ninth Circuit for law and justice but the three-judge panel at Ninth Circuit illegally approved the lawless order to support corruption at the District Court.

## **D. Reason for Granting This Petition**

**President Theodore Roosevelt pointed out,**

**No man is above the law and no man is below it; nor do we ask any man's permission when we ask him to obey it. Obedience to the law is demanded as a right, not asked as a favor.**

These corrupt judges let the lawless Respondents/Defendants stay above the law of the United States. They abused the judicial power to force Plaintiff to stay below the law as a subhuman. It was the continuation of the inhuman treatment that Plaintiff received while I was locked up in TTCF for a bogus criminal case.

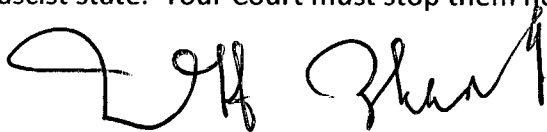
Respondents can't deny their wrong conduct anymore as they made no response to my Strong Opposition to R&R at the Central District Court. But George Wu and Pedro Castillo loved

to help such lawless cops. Besides, given the WAIVER of California Department of Justice to my Petition for the criminal case BA391915 to the US Supreme Court, Defendants in fact already admitted all their lawless conducts against Petitioner. However, the so-called magistrate judge and the corrupt district court judge at Central District Court of California still refused to apply laws for this civil case. The Federal Appeal Court for the Ninth Circuit also refused to grant the appeal to stop the immense corruption against the United States Constitution with a bogus alibi of being frivolous. Why are such federal court judges so corrupt in this country?

Your Court can see from above statements, Petitioner gave sufficient facts in the four Causes of Action and quoted applicable federal laws in the Complaint at the District Court and then filed the Opening Brief to the Ninth Circuit with facts and laws, this case should get a lawful treatment as this is the mission of the federal court to deter the lawless conduct by the Respondents/Defendants. But the corrupt judges at the US District Court for the Central District of California willfully only shut their eyes for such serious violations of the civil rights to a citizen who was inhumanly treated at such a government institution. The Ninth Circuit also willfully ignored such violations. These corrupt judges acted as agents of the Chinese communists and their American accomplices including the lawless Defendants in the persecution against a China democracy advocate and a senior US citizen to this date. They have the duty to protect federal laws and to make "liberty and justice for all." However, while George Wu and Pedro Castillo are very corrupt at the federal District Court, the three Judges Fernandez, Nguyen and Owens at Ninth Circuit Court followed their suit. They should be condemned for their swindling roles in their federal courts. Such corrupt judges at the district court and at the Ninth Circuit made this case lawless and ridiculous. They continued their lawless conduct to help the Respondents to act as a pack of wolves before the innocent Petitioner who is a victim not only of the brutality committed by the sheriffs in Los Angeles County, but also of the immense judicial corruption at the federal courts. Petitioner must declare that it is illegal for the District Court and for the Ninth Circuit to deny this case. It is illegal and unconstitutional to deny a case filled with federal civil rights claims.

**Conclusion:** Given the reasons stated in this Petition, Petitioner respectfully requests the US Supreme Court to reverse the lawless verdict made by these corrupt judges at the US District Court for the Central District of California and by the three pseudo judges at the Court of Appeal for the Ninth Circuit. Your Court should stop the immense corruption at the federal courts and make liberty and justice for all as this case accuses the government employees, a pack of rascals of their cruelty to an innocent citizen, and about the terrible corruption at the federal courts as these so-called judges love to follow the wings of power for their own interest. All these rascals are turning California into a fascist state. Your Court must stop them now!

DATED this 15<sup>th</sup> day of April 2024



---

Petitioner, Jeff B. Zhang, Ph.D., Pro se