

Case no. 23-759

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IN THE  
Supreme Court of the United States

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GARY EUGENE MADDOX JR

v

Petitioner

THE PAROLE COMMISSION OF MARYLAND  
AND ITS AGENTS' CHAIRMAN DAVID R  
BLUMBERG COMMISSIONER JASON KECKLER  
COMMISSIONER JOHN SMACK AGENT  
DE'ANGELO PATTERSON AGENT ROBIN D  
HALL AGENT TIMOTHY MOXLEY

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Respondents

ON PETITION FOR WRIT OF CERTIORARI TO  
THE UNITED STATES SUPREME COURT FOR  
WASHINGTON DC

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PETITION FOR REHEARING

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Gary Eugene Maddox Jr  
Cinemaddox Productions  
43 Lancashire St  
Providence Rhode Island 02908  
Telephone. 401-301-3919  
[Cinemaddoxstudios@icloud.com](mailto:Cinemaddoxstudios@icloud.com)

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### **Eighth Amendment**

Excessive bail shall not be required, nor excessive  
fines imposed, nor cruel and unusual punishments  
inflicted.

### **Extrinsic fraud**

Extrinsic fraud is an act of deception or  
misrepresentation outside the event itself which  
deprives the victim of material information or  
participation.

## PETITION FOR REHEARING

Petitioner Gary Eugene Maddox Jr petitions  
for rehearing of this Court's February 22, 2024,  
Order denying the petition for a writ of certiorari.

## REASONS FOR GRANTING REHEARING

The evidence to support Mr. Maddox's claims was not available when the writ of certiorari was filed, but maddox has managed to recover a copy of the evidences and is entering them with this document.

Also, throughout the entirety of the case there was never a hearing or any dispute resolution, or curative instruction of any kind to fix the initializing issue of the charges on the NCIC so that Maddox could productively begin to work.

Maddox began this endeavor with a cease-and-desist letter, and two separate judicial reviews and then a writ of Mandamus, which was not a civil suit until the first warrant was issued.

Maddox's concerns are that if the judicial review had gone to the administrative law judges and through it's correct procedural avenue in the very beginning of this case in Baltimore city circuit court.

the issue of the NCIC and any dispute could have been resolved by the ALJ but because of the extrinsic fraud produced by civil Judge, John s Nugent who dismissed the judicial reviews and district attorney Brian Frosh colluding together to impede the judicial

The Forged falsified documents from the parole commission that are dated 01/22/2023 see. App. 8-14

Coupled with the impedance of the judicial process on both judicial reviews see App 21-34 with both warrants and the false felony charges on Maddox's record see. App 15

Also, with the immediate ordering of the fourth circuit courts reversal of the parole commissions last ditched attempt at trying to force Maddox in to registering as a sex offender.

Proves that Maddox was maliciously and consistently pursued by the defendants without probable cause which is ethically unusual.

without a rehearing, from this court  
It would allow the defendants to succeed in the detriment that they set out to cause for Mr. Maddox from the beginning which has made it impossible for Maddox to gain employment or housing. Completely publicly ostracizing Maddox from everywhere he may try to live or work.

Which is cruel and unusual punishment in a disturbing manner and has become exceedingly detrimental to maddox's livelihood and living standards.

After Maddox received the falsified /forged documents from the states attorney's office back in May of 2023. Maddox immediately entered the documents into the fourth circuit court case to show that he was still maliciously being sort after by the defendants. the forged documents are a direct

Attempt at portraying Maddox's conviction as a federal man act and pandering conviction which intern, is creating a paper trail of falsified statements about Maddox to further the oppressive nature that has been inflicted on Maddox Ab initio.

This is an appropriate case for rehearing.

Maddox has continuously been embroiled in litigation for almost four years, and with no curative intervention from any court So that Maddox could become productive in society.

With this Court's denial of his petition, maddox now faces a crippling financial and housing, ostracization from lack of any judicial resolution to remedy the wrongful charges placed on Mr. Maddox's record.

Being that this case is unique in many constitutional ways this court's justices have jurisdiction and the power to correct such a critical issue.  
without intervention from the justices of this court.  
Maddox will be permanently ostracized from any American living standard comprising of NCI or BCI which intern is a violation of Maddox's life and liberty as a US citizen

### CONCLUSION

For the foregoing reasons, and those stated in the petition for a writ of certiorari, the Court should grant rehearing, grant the petition for writ of certiorari, and reverse the judgment of the United States District court of Maryland and also add curative measure to remove the false charges from Maddox's record.

Respectfully Submitted  
Gary Eugene Maddox Jr  
43 Lancashire st Providence RI 02908  
[Cinemaddoxstudios@iCloud.com](mailto:Cinemaddoxstudios@iCloud.com)  
Telephone# 401-301-3919  
/s/



### CERTIFICATE OF PRO SE LITIGANT

As the petitioner, I hereby certify that this petition for rehearing is presented in good faith and not for delay and is restricted to the grounds specified in rule, 44.2.

*Gary L. Mottley Jr*