

No. 23-7618

IN THE
SUPREME COURT OF THE UNITED STATES

JESSE A. REYNOLDS — PETITIONER

vs.

TITUS COUNTY ET AL., — RESPONDENT(S)

PETITION FOR REHEARING

Jesse A. Reynolds

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Fourteenth Amendment, Section 1: *All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.*

Amdt14.S1.5.4.4 Opportunity for Meaningful Hearing

As a general matter, procedural due process requires an opportunity for a meaningful hearing to review a deprivation of a protected interest.¹

1. *Mullane v. Cent. Hanover Bank & Trust Co.*, 339 U.S. 306, 313 (1950)

The Court has held that it is a violation of due process for a state to enforce a judgment against a party to a proceeding without having given him an opportunity to be heard sometime before final judgment is entered.⁵

5. *Postal Telegraph Cable Co. v. Newport*, 247 U.S. 464, 476 (1918); *Baker v. Baker, Eccles & Co.*, 242 U.S. 394, 403 (1917); *Louisville & Nashville R.R. v. Schmidt*, 177 U.S. 230, 236 (1900)

A party must be given an opportunity not only to present evidence, but also to know the claims of the opposing party and to respond to them.¹⁸

<https://constitution.congress.gov/browse/essay/amdt14-S1-5-4->

4/ALDE_00013753/#ALDF_00028836

Amdt14.S1.5.4.5 Impartial Decision Maker

The Due Process Clause requires that the decision to deprive a person of a protected interest be entrusted to an impartial decision maker. This rule applies to both criminal and civil cases.¹ The Supreme Court has explained that the neutrality requirement helps to guarantee that life, liberty, or property will not be taken on the basis of an erroneous or distorted conception of the facts or the law and preserves both the appearance and reality of fairness . . . by ensuring that no person will be deprived of his interests in the absence of a proceeding in which he may present his case with assurance that the arbiter is not predisposed to find against him.²

1. *Tumey v. Ohio*, 273 U.S. 510 (1927); *In re Murchison*, 349 U.S. 133 (1955); *Goldberg v. Kelly*, 397 U.S. 254, 271 (1970). See also Amdt14.S1.5.5.2 Impartial Judge and Jury.
2. *Marshall v. Jerrico*, 446 U.S. 238, 242 (1980); *Schweiker v. McClure*, 456 U.S. 188, 195 (1982)

https://constitution.congress.gov/browse/essay/amdt14-S1-5-4-5/ALDE_00013754/

Amdt14.S1.5.4.6 Additional Requirements of Procedural Due Process

Beyond the requirements of notice and a hearing before an impartial decision maker,¹ due process may also require other procedural protections such as an opportunity for confrontation and cross-examination of witnesses, discovery, “a decision based on the record”, or the opportunity to be represented by counsel.

1. See Amdt14.S1.5.4.3 Notice of Charge and Due Process; Amdt14.S1.5.4.4 Opportunity for Meaningful Hearing; Amdt14.S1.5.4.5 Impartial Decision Maker

The Supreme Court has also held that due process requires decisions to be based on the record before the decision maker. Although this issue arises principally in the area of administrative law, it applies generally.⁸ The Court has explained that a decision maker's conclusion must rest solely on the legal rules and evidence adduced at the hearing.

https://constitution.congress.gov/browse/essay/amdt14-S1-5-4-6/ALDE_00013755/#ALDF_0002

The United States District Judge in the Eastern Division of Texas is ignoring the petitioner's right to due process secured by the fifth and fourteenth amendments, the petitioner's right to a meaningful hearing secured by the fourteenth amendment, the right to an impartial decision maker secured by the fourteenth amendment; and the right to a decision based on the record secured by the fourteenth amendment.

The United States District Judge made a mistake or committed fraud in court by dismissing the complaint without regards to the law or evidence of fraud by county officials; sent with the motion for Summary Judgment, document number 8 (p. 46) of the court record.

“MOTION for Summary Judgment by Jesse A Reynolds.
(Attachments: # 1 (p.4) Exhibit A-B, # 2 (p.17) Exhibit C, # 3 (p.23) Exhibit D-E, # 4 (p.24) Exhibit F-H, # 5 (p.27) Envelope
(Entered: 10/12/2023)”

CONCLUSION

The petitioner states that a portion of the requested compensation for damages will be accepted if the court grants this petition. The petitioner states that he is willing to accept \$1,752,000.00. A number based on .01 of the request for damages.

Also, the amendment listing the state as defendant would be removed from the record at the request of the petitioner.

This petition for rehearing should be granted if the rights of the people of the United States are secure; and if the members of the Supreme Court of the United States of America respect history or service to this country.

Respectfully submitted,



J. Reynolds

Date: 10/23/2024

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CERTIFICATION OF COUNSEL

The petitioner states that this petition is restricted to grounds that are limited to intervening circumstances of a substantial or controlling effect or to other substantial grounds not previously presented and that it is presented in good faith and not for delay; Rule 44.2.



(Signature)

