24-146

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

ARTHUR LOPEZ – PETITIONER

vs.

Paul R. Figueroa (AKA Pablo R. Figueroa) –

RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

California Supreme Court

PETITION FOR WRIT OF CERTIORARI

ARTHUR LOPEZ

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QUESTIONS PRESENTED

Should Male, Catholic Christian, Father of four children be afforded Restraining Order, Equal Protection and Due Process under law as guaranteed by the United States Constitution and as provided to female mothers on matters of Civil Restraining Orders despite Respondent's Brother-In-Law Christopher Covarrubias (Supreme Court Case #23A810) being a U.S. Air Force affiliate and both involved in prostitution sponsoring – Sex Trafficking with a third brother-in-law – Robert Valdez (CA Supreme Court Case #S284646) and Female, mother of Petitioner's children, in accord with California Family Code, Fam Code 6320 (a)(b)(c), 3020, 7602 and CA Code of Civil Procedure CCP 527.6?

LIST OF PARTIES

[x] All parties appear in the caption of the case on the cover page

[ ] All parties do not appear in the caption of the case on the cover page. All parties to the proceeding in the court whose judgment is the subject petition is as follows:

RELATED CASES

- Arthur Lopez v. Paul Figueroa U.S. Supreme Court Case #23A812

- Arthur Lopez v. Robert Valdez CA Supreme Court Case #S28465

- Arthur Lopez v. Cheryl Lopez Superior Court of CA, County of Orange #16D001283

- Arthur Lopez v. Actualidad Media Group, LLC, Florida Court of Appeal, 3rd District, Case #3D2024-0032

- Arthur Lopez v. Christopher Covarrubias, California Supreme Court #S281348, S283085, #23A810

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(Case # S281353, October 25, 2023, Case # S283090, February 14, 2024)

Appendix B

CA Court of Appeals, 2nd Appellate District Case

#B328530)

The Supreme Court of the United States

July 27, 2023

Appendix / Exhibit C

Los Angeles County Sheriff's Department report related to criminal assault by suspect – Respondent Christopher Covarrubias upon female victim on November 17, 2018 had been delayed for several weeks and became available May 26, 2023. Moreover, the second Sheriff correspondence with additional fragmented facts pertaining to the same and dated May 12, 2023 also serves to support petitioner's requested restraining order and the merit to these appeal cases proceeding since dismissal of the trial court cases unjustifiably took place before the presiding judge even provided a determination to the application's VL-110 which were received by the Whittier court – Trial Court but then forwarded to Stanley Mosk Courthouse. The Trial Court was always aware of the abusive

conduct of respondent as it was provided in the initial narrative and as purpose for seeking restraining order (the victim of assault – Dominique Valdez – sister of Robert Valdez who is also an associate of Cheryl Lopez, # B324256).

Appendix / Exhibit D

Respondent Sex Trade assault Cheryl Lopez video clip

Screenshot (06/21/2022)

Crash landing of red air #203 – Miami International Airport returning from prostitution assignment, prostitution haven Dominican Republic

Appendix D

Screenshot from video clip (39 seconds) (06/21/2022)

https: // x.com/aviationbrk/status/1539401507031891968

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Table of Authorities

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2) In Re N.R. Los Angeles County D.C.F.S. v. Cumber R. et al #B268705 (10/17/2016) "Prostitute Mother Not in Best Interest of Children"

3) In Re R.K. – Los Angeles County Department of Children and Family Services v. R.M., Defendant – Case No #B308256 CA Court of Appeal, 2nd District (May 10, 2021)

"Prostitution Not in Best Interest of Child"

4) Luckett v. Panos (2008) 161 Cal. App 4th 77, 90 California Court of Appeals, Fourth District, Division Three Holding: [prefiling order or order denying / declining to dissolve a prefiling order under Code of Civil Procedure section 391.7 is appealable as an injunction or order denying a motion to dissolve an injunction]"

5) PBA, LLC v. KPOD, Ltd, 112 Cal. App 4th, 96 California Court of Appeal, Second District, Division 7, October 22, 2003

Holding: "although section 391.7 does not absolutely exclude the proper litigant from the courts, we believe 'fundamental fairness' requires the vexatious litigant brand be

erasable in appropriate circumstances (et. al p. 976, original intakes)"

6) Shalant v. Girardi, 51 Cal. 4th 1161 (June 23, 2011)

Holding: "Continuing in Propria Persona (Pro-Per) after Counsel withdrew did not violate Vexatious Litigant prefiling order disproving Forrest v. Dept. of Corporations, So Cal App. 4th 183" "Term Litigation as defined in vex. Lt. statute does not include any motion or special proceeding (CCP 391(a))."

7) Garcia v. Lacey, 231 Cal. App 4th 402 (November 12, 2014) "Cases involving Denials of Inmate's applications to proceed in forma paus peris (LFP) did not constitute

litigation within meaning of the Vexatious Litigant Law"

8) Wolfgram v. Wells Fargo Bank, 53 Cal App 4th 43 (February 27, 1997) "Vexatious Litigant Statute did not chill Plaintiff's right to Petition Government for Redress of Grievances."

9) In re: Natural Gas Antitrust Cases I, II, III + IV, 137 Cal. App 4th 387 March 6, 2006 1.) Attorney's conduct in filing objections to settlements and 2.) His liking to reinstate dismissed appeals was not Vexatious Litigation.

10) In re: Bittaker, 55 Cal. App 4th 1004, June 12, 1997

"Hablas Corpus petitioner was not subject to Vexatious Litigant Procedures."

11) Mahdavi v. Superior Court, 166 Cal App 4th 32 August 20, 2008 "A court may not require defendant to seek leave before filing appeal."

12) John v. Superior Court, 63 Cal 4th 91 "Vexatious Litigant prefiling requirement does not apply to an appeal as a defendant."

13) In re: Marriage of Shalondon and Eddie Goodwin Case No. B284416 (January 23, 2019) – CA Court of Appeals, 2nd District, Division 5. "Goodwin must be given proper notice and an opportunity to be heard. [Moreover] Nothing we have said, however, expresses a view on whether Goodwin may be declared a Vexatious Litigant if proper procedures are followed" Order reversed. Also, please note Notice of Motion – Hearing – Motion must be upon notice and supported

by a showing establishing its grounds.", see Bravo v. Ismaj (2002) 99 Cal App 4th, 220-221 (2002).

14) Wilson v. Bittick, 63 Cal. 2d 30, June 24, 1965 Supreme Court of California "The Court held that the facts did not support the contention that the action was harassing and Vexatious Litigation." The Court reversed and remanded the decision of the lower court.

15) Cannon v. University of Chicago, 441 U.S. 677 Supreme Court of the United States "The burden of expensive, vexatious upon institutions have resources often are severely limited may well compel an emphasis on objectively measured academic qualifications at the expense of more flexible admissions

criteria that bring richness and diversity to academic life..." Reversed and remanded.

16) General Atomic Co. v. Felter, 434 U.S. 12 (October 31, 1977)

17) Donovan v. Dallas, 377 U.S. 408 "It is not within the Power of State Courts to bar litigant from filing and prosecuting in person am actions in the federal court(s)."

18) Slack v. McDaniel, 529 U.S. 473 (April 26, 2000)

The Supreme Court holding:

"The Court reversed the decision because Petitioner's subsequent federal labels petition was not a second or successive petition since the initial petition was dismissed without an adjudication on the merits..."

19) Flores v. Georgeson, 191 Cal. App 4th, 881 (January 10, 2011) "The Court concluded that the trial court erred in dismissing the action, pursuant to 391.7 subd. (a), on the ground Plaintiff failed to obtain pretrial approval of the litigation.

OPINIONS BELOW

For cases from state courts:

The opinion of the highest state court to review the merits appears at Appendix A to the petition and is

[x] unpublished.

The opinion of the California Court of Appeal, 2nd District court appears at Appendix B to the petition and is

[x] is unpublished.

JURISDICTION

For cases from state courts:

The date on which the highest state court decided my case was December 15, 2023. A copy of that decision appears at Appendix A.

[x] An extension of time to file the petition for a writ of certiorari was granted to and including May 13, 2024 (date) on March 7, 2024 (date) in Application No. 23A812.

The jurisdiction of this Court is invoked under 28 U.S.C. 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

United States Constitution, First Amendment

United States Constitution, Fourteenth Amendment

California Family Code, Fam 6320(a)(b)(c)(d) 3020, 7602

California Code of Civil Procedure 527.06

STATEMENT OF THE CASE

Honorable Supreme Court of the United States Justices, this case derives from the Superior Court of California, County of Los Angeles failure to grant Equal Protection and Due Process under law by denying a Civil Restraining order / and TRO (23WHRO00472) on 03/07/2023 and the Court of Appeal, Second District Dismissal (#B328532) of appeal subsequently ordered on July 27, 2023 following their denial of a pre-filing order and finally the California Supreme Court's (#S282446) Denial of Prefiling order" / Leave to File Writ of Mandate Petition) on December 15, 2023, (and Denial of Petition for Review on 10/25/2023 under case #S281353).

Moreover, the initial petition for restraining order against Paul Figueroa, (Christopher Covarrubias,

U.S. Air Force agent), Brother-in-Law was and continues to be necessary to stop the relentless barrage of harassment from the Respondent and his criminal associates and to stop the stalking from those who sponsor prostitution and Sex Trade Trafficking. The Restraining Order sought is to not only protect Petitioner but also his four children, two of which remain minors (17 and 12 yrs. of age) and also the two other children this restraining order aims to protect are ages 19 and 21 and are unmarried college females. In addition, the protective restraining order has been requested against the two prostitution associates, Respondent's brother-in-laws (while married to Maria Valdez, 1.) Robert Valdez (CA Court of Appeal, Case #B324256, CA Supreme Court Case #S284646), and (through marriage to Dominique

Jessica Valdez) 2.) Christopher Covarrubias (Court of Appeal Case #B328530, U.S. Supreme Court Case #23A810) all of which are notoriously involved in the sponsoring of prostitution sex trade with female sex trade worker Cheryl Lopez (AKA Cheryl Queen). These criminal schemes have been carried out by them while married to Celina Figueroa. Respondent Paul Figueroa's brother-in-law Christopher Covarrubias remained wed to Jessica Valdez through 2018-19 or abouts and remains providing financial allotments following his felony assault of his, then, wife, after being caught in prostitution acts @ their home on November 17, 2018 (located @ 1863 E 69th Street, Los Angeles, CA 90001) and subsequent arrest by Los Angeles County Sheriff (Case #0180-16722-2171-146), see Exhibit/appendix C.

In addition, to these recently discovered facts Respondent Paul Figueroa and Covarrubias have stalked Petitioner for many years to the point of even quoting "Cheryl's" reason for having marital problems with Petitioner, as she stated to Newport Beach Police Department in 2015 following her assault upon Petitioner, ("marriage" struggles were due to Petitioner taking care of their four minor children) not having a paying job. Just the same Respondent Paul Figueroa's brother-in-law Christopher Covarrubias (Appendix C) – states the exact same pretext for divorcing his wife (financial struggles – blaming), Dominique Jessica Valdez who, while pursuing an education, did not have a source of steady income and as such was not able to remain married or faithful to, just before their dissolution of marriage and which Covarrubias

recited a short time after Petitioner's false imprisonment, due to the false accusations by sex trade worker Cheryl Lopez (Case #16HM10451) for which the motivation to this false imprisonment of 37 days in 2016 was the prolonging of the alienation of Petition's four minor children (going on 9 years now). Needless to say, these premeditated schemes to harm Petitioner by Paul Figueroa and his criminal associates in an attempt to extort money and alienate him and his children are cause for enormous emotional distress, deprivation of Parental Rights and have allowed these to carry out sex crimes and sex trafficking. Please note Respondent Paul Figueroa through his brother-in-law Covarrubias have had access to enormous stalking resources through the active service of brother-in-law in the U.S. Air Force and

U.S. Air Force roles subsequent to his discharge as part of the U.S. Dept. of Defense job / affiliation while Figueroa used his Spanish / Puerto Rican roots and multinational plastics distribution platform to cross borders with these prostitution sponsoring schemes.

In addition, the sex trafficking of Prostitution – Sex Trade Worker "Cheryl Lopez" who was caught on video on June 21, 2022 after the Crash Landing of Flight 203 from Red Air @ Miami International Airport as she returned from a Prostitution Engagement in the Prostitution Haven Dominican Republic (video is still posted on Twitter / X handle – x.com/aviationbrk/status/1539401507031891968) for which video is still posted on Twitter "X", clip capturing Cheryl Lopez (mother of Petitioner's children) isolated on tarmac in the last 3 seconds

further confirms the critical need for this requested restraining order. Furthermore, brother-in-law Robert Valdez enraged by the revelation – disclosure of his criminal enterprises while married threatened to "Ram his dick up petitioner Arthur Lopez's ass" in May of 2022 and in July of 2022 after he was personally served with subpoena to appear at a court hearing on June 13, 2022; moreover, in July of 2022, sixteen (16) Bicycle Club Casino Hotel Registry Invoices (Bell Gardens, California) were uncovered through a subpoena reflecting his signature on each, which is located just three miles from his home in Maywood despite his testimony on June 13, 2022 that he had never been a guest at such local hotel / casino / motel within three miles of his home without his wife. In fact, Cheryl Lopez's neighbor acknowledges a

brothel exists nearby to Cheryl's residence (Michelle Allen who personally served her @ her residence with court documents in May 2022), and moreover another nearby neighbor Tina Chaffin on May 23, 2022 at approximately 9pm befriended petitioner Arthur Lopez and agreeing to provide personal service of court document upon "Cheryl Lopez" the same morning of "Robb Elementary" massacre May 24, 2022, by the son of drug addict unmarried female. This is most significant since Tina Chaffin showed up @ a laundromat on May 23, 2022 blocks away from residence circa 9pm and then agreed to meet petitioner the following morning @ the time the tragedy was carried out in Texas. Also, please note Paul Figueroa's brother-in-law Covarrubias is a former U.S. Air Force enlisted associate with anger issues, striking his wife upon

the face and neck for being caught @ his residence in prostitution engagement, these characters are a menace to society consumed with their criminality to the point of converting the Covarrubias home into a Brothel disguised as an Airbnb. While self-professed "Court officer" Robert Valdez who threatened to rape Petitioner and acts as a slumlord to the apt. ghetto where he's resided in for over forty years and even had cocaine shipment stored of approx. 100 kilos, confiscated from a storage container in front of his kitchen window that he and his mother Elvira Valdez had the key for. This roach motel has no landlord # listed and the city of Maywood Civic Center where the F.B.I. conducted a raid and arrested several corrupt council members has no information in the property they can release to the public they claim.

Then, you have the third leg of this trio Paul Figueroa who has his enslaved wife Celina forced to eat the Prostitution activity so she can prop up a façade. This group of filth must be kept away from Petitioner and his children and since associate Cheryl Lopez (Queen) pretends to not understand the danger these activities bring on to Petitioner's children this court is asked to issue Writ overturning the complacency of the lower courts having denied the pre-filing order requested to permit the Civil Restraining Order cases and Issuance to proceed and overcome all the obstructions the criminal element has in place in the lower courts is also requested. Also requested, moreover, is the reinstatement of U.S. Constitutional Civil Rights, Americans with Disabilities Act of 1990, Rights of the Disabled and

Parental Rights must be permitted, and abuse of discretion overcome – reversed. Plaintiff / Petitioner fears for his and his children's safety for the criminal schemes of Respondent Paul Figueroa and his associates / cohorts are continuous overwhelming even for authorities, as such this court is asked to grant Petition for Writ of Certiorari.

Also, in support, please see Correspondences from the Los Angeles County Sheriff's Department, app. C, relating to (Paul Figueroa's brother-in-law) Respondent Sex Crimes Covarrubias's – wife abuse, sex trafficking - upon victim (see #B328530) Female – Dominique Valdez on November 17, 2018 just a few miles (3.8 miles) from Brother-In-Law Robert's apartment complex – residence (where he has lived for more than forty years – rent free as

landlord). The wife abuse / assault occurred @ 1863 East 69th Street, Los Angeles, CA 90001 during a prostitution event discovered by the spouse (while still married to assailant) – Covarrubias striking her in the face and neck. He was arrested and charged.

In fact, brother-in-law Covarrubias's residence was/is converted into a "Brothel" disguised as an "Airbnb" next to Superior (and houser) Foods and numerous Market Warehouses with Long Haul Big Rig – Semi Trucks ever present. Please note this criminal is/has been associated with U.S. Air Force and other rogue participants. In addition to, and sheriff's correspondences, these relevant facts in support of Writ, please note the Bicycle Hotel Casino which produced 16 Registry Invoices for Roberto Valdez who signed Robert Valdez

(Respondent AKA also Roberto Valdez is located @ 888 Bicycle Casino Drive, Bell Gardens, CA 90201, only 3 miles drive from Respondent's Brother-in-Law Robert's apartment complex. These facts are part of the initial Civil Harassment Restraining Order Petition following threats of rape and bodily harm and also the crash landing of Red Air Flight 203 @ Miami International Airport on June 21, 2022 originating from prostitution haven Santo Domingo, Dominican Republic during which time Robert Valdez was out of country evading service of the Restraining Order Notice to appear by the Los Angeles Sheriff (22STRO03598) + 22STRO0546 filed June 15, 2022) and moreover, female sex trade worker Cheryl Lopez, (16D001283), following a travel ban hearing on June 13, 2022 (with Robert Valdez testifying and committing perjury), appears

to be fleeing the burning plane on the tarmac in a 39-second video posted by Actualidad Radio LLC (From Miami, Florida) and reposted by Russian Television – RT News from "@aviationbrk" (x.com/aviationbrk/status/1539401507031891968). Now if these sex crimes + criminal activities are not enough then you also have this other associate who is complicit in the sex trafficking, Respondent Paul R. Figueroa (See B328532 and Case #23A812 U.S. Supreme Court) who is not only married to Robert Valdez's sister Celina Figueroa who has covered up these sex crimes for years (at least 15 years) but is also directly connected to Covarrubias and Cheryl Lopez. Furthermore, Cheryl Lopez who is employed by an international (South Korean based) company (as is Paul Figueroa who is employed @ LAIRD Plastics, a plastics company operating across into

Mexico and whom is of Puerto Rican descent) colluded with Erika Tsimbalov (@zenbunny_soundhealing), Ukrainian heritage who false accuse Plaintiff / petitioner Arthur Lopez of wrongdoing leading to a (09/12/2016) 37 day false imprisonment before a judge was compelled to dismiss all charges and closing case without a trial after finding absolutely no evidence of any wrong – 100% exonerated (Case #16HM10451) but having to endure captivity – sleep deprivation and abuse from O.C. Sheriff. In fact, the motive and scheme by Cheryl Lopez – Christopher Covarrubias – Paul Figueroa – Robert Valdez – Erika Tsimbalov throughout this false imprisonment was also to compromise a custody hearing for modification of Plaintiff's minor children protective order, which was supported instantly by bias judge Stephanie

George, who was herself arrested on a child endangerment charge November 9, 2016 (7pm). In addition, "Public Defender" failed to file appeal on the adverse custody matter ruling while Petitioner was in custody (coincidentally – or not – 37 days just beyond the 30-day appeal period), further harming Petitioner and his children.

Moreover, the Los Angeles County Sheriff's Department delayed the release of these two correspondences dated May 12th and May 26th (Appendix C) of 2023 needlessly for over a month and under false pretense while under color of law since the, (albeit fragmented), released facts pertaining to this criminal assault are very much in the Public Interest to be released and not subject to exemption as they have ultimately acknowledged. Moreover, more facts and evidence is subject to

release especially since the Los Angeles Sheriff's Department and Sheriff Robert Luna have been repeatedly served with a Civil Subpoena (duces tecum) as of April 13, 2023. Furthermore, the Restraining Orders sought are to also protect Petitioner's children (2 of which are minors, and the two females are 19 and 20 years old) very much vulnerable.

Unfortunately, this respondent Paul Figueroa, and his brother-in-law Christopher Covarrubias (#23A810) and his brother-in-law Robert Valdez, and also sex trade worker Cheryl Lopez (Queen) have conspired to alienate Petitioner's children for over eight years to facilitate the sponsoring of prostitution and sex trafficking and extort money from Petitioner to the benefit of Cheryl Lopez, her mother, and family. He has used his and his

brother-in-laws' s affiliations to who are staffed @ Superior and Appellate Courts as administrative staff to hamper custody matters in Family Law Court in Orange and also derail cases in Civil Unlimited Litigation where Petitioner's a plaintiff. In fact, a first cousin of Figueroa's brother-in-law Robert Valdez is employed @ Fresno County Superior Court (Soledad Echeagaray). In addition, two Family Law Court staff members are also subjects of Civil Restraining Orders Petitioner has petitioned under Superior Court of California, County of Orange Case #30-2022-01260365 and #30-2022-01260360 (Perla Elias and Kristal Gorospe respectively). Furthermore, Petitioner has been targeted by other U.S. Military associates of brother-in-law Covarrubias in a hit and run and physical assault on October 7,2023 which was

reported to local police – Costa Mesa Police Department Case #6-23-014764 and 23-014765 (Hit + Run and physical assault reports respectively), the driver's name James Stanfield while the passenger, who committed the assault, remains unnamed by James Stanfield and the Costa Mesa Police Department officers/detectives. Moreover, Petitioner continues to be harassed and obstructed by way of cell/data signal remote interference to stifle ongoing litigation and impede meeting court-imposed deadlines for filings. In fact, the physical assault on October 7, 2023, involved extensive damage to cell phone Petitioner was holding in his right hand before assailant's strike to Petitioner's hand / wrist / arm. Additionally, on August 24, 2023, Petitioner was targeted in another hit and run incident involving a U.S. Post Office white

truck on the same day an opening brief was due to the Court of Appeals on the matter against this Respondent Figueroa's brother-in-law Robert Valdez. The incident was reported to Santa Ana Police – Case #2023-9348.

Writ of Certiorari Relief Sought

1) The immediate reversal of the California Court of Appeals, Second District, aired by denying the pre-filing order for the filing of the appeal case known as Case #B3285320, and, moreover, the immediate writ issuance for a Civil Restraining Order against Respondent Christopher Covarrubias for 5 years, CCP 527.06 protecting petitioner / plaintiff Arthur Lopez and his children – minors Luke Jesus Lopez and Noah Abraham Lopez and 21 yr. old Tatiana Kayla Lopez and 18 yr. old Thalia Kaitlyn Lopez for a minimum of five years or longer as permitted by the laws of the State of California, CA Family Code 6320 (a)(b)(c), 7602, 3020, CCP 527.6

2) Furthermore, a writ to be issued to restrain all of the Respondent's cohorts and family from harassing, stalking or harming Petitioner and his children listed above in any fashion. This restraining order is to include a stay away order for a distance permitted by CCP 527.6, Family Code 6320, California law and to include stay away from parties' residences, places of worship, schools, automobiles, cell phone tracking and even monitoring of Petitioner's court cases. Furthermore, cohorts are to include associates of all sorts including the U.S. Air Force, Prostitution Rings, Sex Traffickers, Prostitutes, Drug Trafficking, U.S. Military, Local, State and Federal Law Enforcement since conspiracy to deprive U.S.

Constitutional Civil Rights is actionable under State and Federal Law - United States Title 18 U.S. Code Section 241 and 242.

3) In addition, Protection is to encompass Cohorts of Respondent in and outside of the State of California. This is to say appellant / petitioner Arthur Lopez and his children are not to be harassed, tracked, stalked or obstructed in any way by those also outside of U.S. states or territories the likes of Puerto Rico, Dominican Republic, Vietnam, the Philippines, China, Haiti, the Caribbean, Israel, Ukraine, India, Iran, Saudi Arabia, etc. No prostitution associates of any sort is to come anywhere near appellant / petitioner nor his children as we are all residents of the state of California.

Errors by the Court

1) Trial Court (Whittier Courthouse) and California Court of Appeals for the Second District errored in the Denial of Pre-filing order to allow Civil Restraining Order Case 23WHRO00472 and B328532 respectively to continue and in turn dismissing these cases in violation of Plaintiff / appellant U.S. Constitutional Civil Rights including 14th amendment – Due Process and Equal Protection Under Law and CCP 527.6
2) Trial Court and California Court of Appeals of Los Angeles County erred / abused its discretion depriving Plaintiff / appellant of his civil rights 14th Amendment.
3) Trial Court and California Court of Appeals conspired to attempt to deprive appellant /

plaintiff of his U.S. Constitutional Civil Rights to Freedom of Speech and conspired to cover up prostitution – Sex Trafficking criminal activity – schemes involving Respondent in collusion with court staff of Whitter Courthouse Stanley Mosk, County of Orange Lamoreaux Justice Center, Santa Ana Central Courthouse and Newport Beach – Harbor Justice Center, and Miami-Dade Courthouse in Miami, Florida – all banning to deprive appellant and his children protection under law and to bar the disclosure of the ongoing sex trade from California to Florida and beyond internationally of which respondent is intimately and actively involved. Preventing a filing of case docs / appeal

4) The trial court and appellate court erred in refusing court services to appellant despite reasonable Americans with Disabilities Act accommodation requests by phone and in-person due to his disabilities. Plainly stated appellant's disabilities and disabled status was not a consideration of any sort by the self-help division just as with the Federal Americans with Disabilities Act itself – not a consideration by the court and as such accommodation(s) requests ignored.

5) Trial court erred by permitting court staff to badger – harass and abuse appellant – petitioner – including court security Los Angeles County Sheriff (Nelly and others). Whittier Court and Stanley Mosk court staff and security L.A. Sheriff Deputies and

administrative staff operate like a mob – belligerent – hostile – incompetent and as such inflict emotional distress and cultivate a very dangerous condition environment so as to attempt to intimidate Plaintiff into submission and silence a furtherance of U.S. Constitution Civil Rights Deprivation under Color of Law. 14th Amendment.

6) Trial court (and Appellate Court) erred in refusing the filing and receiving of court documents during business hours (March 7, 2023 and on other occasions as well) even when attached to pre-filing order, VL-110 applications (or in the appellate court refusal of filings when not accompanied by a proof of service – even receiving of court documents).

7) Trial court and appellate court erred in not granting of pre-filing order despite clear evidence of the existence of criminal harassment and unlawful conduct by respondent justifying a restraining order in favor and protection of petitioner and his children. The criminal / unlawful conduct of respondent including sex trafficking – prostitution and Petitioner's daughters of the ages of 18 and 21. Denial of the pre-filing order, VL-110 application despite serious criminality amongst several respondent associates is an abuse of discretion which has evolved in the Massacre of 21 innocent students / staff @ Robb Elementary in Uvalde, Texas and more recently the murder of Superior Court Judge spouse named

Cheryl just as Respondent's sex trafficking associate Cheryl Lopez.

8) Trial court and appellate court erred / failed to recognize their own court staff's involvement with criminal enterprises / syndicates all of which sponsor prostitution – sex trade - in collusion with Respondent and in partnership with court security L.A. County Sheriff Deputies under color of law and as such further confirming the necessity for the petitioned restraining order.

9) Trial court and appellate court erred in failing to accept the Crash Landing of Red Air #203 on June 21, 2022 @ Miami International Airport originating from Prostitution Haven Dominican Republic with video capturing Respondent's Sex Trade

associate Cheryl Lopez (Cheryl Queen – maiden name) on tarmac fleeing burning plane as sufficient threat to Petitioner and his children to issue granting of pre-filing order, VL-110 application and the due process to issue a restraining order.

10) Trial court erred along with the appellate court in failing to accept Paul Figueroa's grooming of Cheryl Lopez and subsequent sex trafficking / prostitution along with brother-in-law Robert Valdez and threat to rape Petitioner as cause to grant the pre-filing order, VL-110 application so as to allow Due Process for the issuance of the requested Restraining Order

11) Trial court erred in refusing to grant Temporary Restraining Order, Pending

Hearing on Permanent Restraining Order Issuance

12) Trial Court and appellate court abuses its authority by sponsoring sex trade – prostitution

13) Trial court and appellate court systematically deprive Civil Rights and rights provided for the disabled under the ADA.

14) Trial court erred by abusing discretion in failing to recognize that mother's prostitution – sex trade work – is "Not in the Children's Best Interest" see the herein attached Points of Authority in support, Family Code 3020 as such sufficient cause to grant pre-filing order since pandering and conspiring to promote sex trafficking is

unlawful all of which is not in the child's best interest and this restraining order needs to be issued, Family code 3020, 6320, CCP 527.6.

REASONS FOR GRANTING THE PETITION

This petition should be granted to issue Civil Restraining Order against Respondent Paul Figueroa, for protection and to restore Due Process Civil Rights under Law as guaranteed by the United States Constitution, 14th amendment in favor of Male Father of four children on matters related to Civil Restraining Orders pursuant to California Statutes, including Family Code 6320.(a)(b)(c) and CA Code of Civil procedure 527.6 especially as it pertains to the protection of children (minor children) of Petitioner, Fam. Code 3020 and 7602. In doing so, granting of this petition will also serve to curtail the enormous female gender bias on matters of parental and custody rights that has become common, custom practice in California Family Law Superior Court whereby

80% of custody cases are granted in favor of female mothers, depriving male fathers petitioner parental rights / 14th amendment rights as well and for which this restraining order is also essential to prevent further deprivation of rights and cease harm to Plaintiff and his children.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Arthur Lopez

May 12, 2024