3/7/2024

No. 24-42

In The Supreme Court of the United States

Scott Meide, on behalf of himself
Petitioner

v.

Pulse Evolution Corporation et al
Defendants

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

I

Has F.R.Civ. P. I been abrogated by judicial fiat?

II

Should the Rules Concerning Unpublished Opinions Be Rewritten and/or Modified?

III

Do We Have a Government Of Laws And Not Of Men (or Women)?

IV

May A Corporation Assign Its Interest In A Lawsuit to a Non-Lawyer?

V

Did the District Court Subject Petitioner To A Piecemeal Appeal?

VI

Should Plaintiff Have Been Granted Discovery?

VII

Were The Sanctions Imposed Unreasonable?

VIII

Was Petitioner Entitled To An Unbiased Judge?

LIST OF PARTIES

Scott Meide
Plaintiff
Pulse Evolution Corporation
John Textor
Gregory Centineo
Julie Natale
Dana Tejeda
Agnes King
John King
Evolution AI Corporation
Jordan Fiksenbaum
Laura Anthony
Frank Patterson
Facebank Group, Inc.
Defendants

CORPORATE DISCLOSURE STATEMENT

Petitioner Scott Meide was defendant in the district court and appellant in the court of appeals. Pursuant to Supreme Court Rule 29.6, Petitioner discloses the following: Petitioner has no parent company, and no publicly held company owns 10% or more of Petitioner's stock.

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[1] Associate city attorney of Duluth, 1897-1898, mayor of Nome 1903-1904, U.S. district attorney 1st Division of Alaska, 1910-1914, and Attorney General of Alaska, 1921-1933.

PETITION FOR A WRIT OF CERTIORARI

Scott Meide respectfully petitions for a writ of certiorari to review the judgment of the United States Court of Appeals for the Eleventh Circuit in *Scott Meide v. Pulse Evolution Corporation* (etc) No. 22-13404 (Lagoa, Brasher and Hull).

OPINIONS BELOW

The memorandum opinion of the court of appeals upholding the award of sanctions is not reported but is available through PACER; Public Access to Court Electronic Records (the subscription fee is nominal). *Meide v. Pulse Evolution Corporation, et al.*, 3:2018-cv-1037, Fla. Middle District Court. *Scott Meide v. Pulse Evolution Corporation, et al.* 0:2022-prici-13404, U.S. Court of Appeals, Eleventh Circuit.

JURISDICTION

This Court's jurisdiction is invoked under 28 U.S.C. § 1254(1).

CONSTITUTIONAL PROVISIONS INVOLVED

This case involves the Fifth and Eighth Amendments to the U.S. Constitution of the United States.

The fifth Amendment to the U.S. Constitution provides:

> No person shall be held to answer for a capital, or otherwise infamous crime, unless on a

> presentment or indictment of a grand jury, except in cases arising in the land or naval forces, or in the militia, when in actual service in time of war or public danger; nor shall any person be subject for the same offense to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.

The Eighth Amendment to the U.S. Constitution provides:

> Most often mentioned in the context of the death penalty, the Eighth Amendment prohibits cruel and unusual punishments, but also mentions "excessive fines" and bail. The "excessive fines" clause surfaces (among other places) in cases of civil and criminal forfeiture, for example when property is seized during a drug raid.

Amendment VIII

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

STATUTORY PROVISIONS INVOLVED
15 U.S.C. § 78 U- 4(c)(1)
STATEMENT OF THE CASE

Petitioner was the victim of a "pump and dump" securities fraud case initiated by the Respondents. Rather

than allowing the Petitioner his day in court, the district court judge did everything she could to cover for and protect the actions of the Respondents.

The 11th Circuit Court of Appeals panel then covered for the district court judge. This is not a new problem.

> The aggrieved party read and reread the briefs as well as the transcripts. His mind is fed on nothing else during the three months waiting for the action of the court. He knows every point raised. He can repeat every argument advanced. All his savings through a lifetime are tied up in the case. He knows he is right. Then comes the decision. It deals with none of the points argued. It shows on its face the court refused to read the brief. He had been tossed aside like a white chip. He knows, and his friends know, he has been denied his day in court.
>
> To that man, to his family and to his friends, organized society is organized iniquity.
>
> And the present system is manufacturing citizens of such sentiments by the thousands every year.
>
> Underneath the social unrest of the world today, as its main underlying cause, is the feeling in the breasts of the masses that justice is not for them. They do not know the cause, nor can they suggest the remedy,—and so they only want to destroy. Society to them has come to mean organized injustice.

John Rustgard,[1] *Dry Bones The Remedy for the Evil,* 88 Central Law Journal, p. 341, 344 (May 9, 1919).

> There are also available, especially to a court of last resort, certain thoroughly illegitimate leeways of action which can "buttress" or cover unreckonable deciding. Thus: the flat ignoring of authority in point which is technically controlling; the presentation of prior cases as if they held what they do not, or did not hold what they did; the ignoring or outright twisting of vital facts in the record in hand; and the like. The horrible thing here is that unwillingness to face up to responsibility for needed change in law or inability to discover and phrase a broadly solving rule can in a good cause lead even an upright and careful court to blacken the judicial shield by such procedures.
>
> Llewellyn, *The Common Law Tradition: Deciding Appeals,* page 27 footnote 18 (Little, Brown and Co. 1960).

[D]ue process cannot be satisfied when the state provides a "hearing" at which the judge is not really listening or before which the decision has already been made. *See United States v. Cross,* 128 F.3d 145, 148 n. 2 (3d Cir. 1997). *See also* the ABA Model Code of Judicial Conduct (1998 edition), Canons 1A, 2A, 3B(2), (5), and (8).

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[1] Associate city attorney of Duluth, 1897-1898, mayor of Nome 1903-1904, U.S. district attorney 1st Division of Alaska, 1910-1914, and Attorney General of Alaska, 1921-1933.

After the *Twombly* decision was announced, it became unclear what standard should be used to decide whether a case should be dismissed for failure to state a claim upon which relief can be granted.

In November 2008, I attended a national conference of federal appellate judges in Washington, D.C. There were panels on several topics, each with a Supreme Court justice and two law professors. The panel on civil litigation included Justice Stephen Breyer.

During the question-and-answer period, several federal court of appeals judges, with real frustration and even anger in their voices, asked what is the standard of pleading in federal court after *Twombly*. Finally, Breyer responded, also with frustration and anger in his voice, that *Twombly* is just about pleading in antitrust cases. That was certainly a possible reading of Justice Souter's majority opinion. But six months later, in *Iqbal*, the Court rejected this view and said that the new, more restrictive pleading standard applied to all civil litigation in federal court.

Iqbal sued fifty-three defendants, including Attorney General John Ashcroft, asserting that his detention and treatment violated the United States Constitution. In a 5 – 4 decision, the Supreme Court concluded that Iqbal's complaint should be dismissed because he failed to allege sufficient facts for a court to conclude that it was "plausible" he could recover. Justice Kennedy wrote for the Court, joined by Chief Justice Roberts and Justices Scalia, Thomas, and Alito. No longer could plaintiffs go forward with a claim unless there was no set of facts upon which they could recover. No longer

did courts have to accept the allegations of the complaint as true, the Court said that federal courts should ignore factual allegations that were just conclusions without evidentiary support. To see how radical this is in changing the law, one need only pick up a copy of the Federal Rules of Civil Procedure, the rules that govern the procedures in all civil cases in federal court. Every sample complaint that it presents as acceptable would have had to be dismissed under the new standard adopted by *Iqbal*, for failing to allege adequate facts.

The new standard is "plausibility". This requires a plaintiff to allege enough facts that a court can find it plausible for the plaintiff to recover. The Supreme Court declared: "To survive a motion to dismiss, a complaint must contain sufficient factual matter, accepted as true, to state a claim to relief that is plausible on its face." It is unclear what this means. Justice Kennedy's majority opinion simply said that courts should decide what is plausible based on context. "Determining whether a complaint states a plausible claim for relief will...be a context-specific task that requires the reviewing court to draw on its judicial experience and common sense."

Obviously, what is plausible to one district court judge might not be plausible to another. By October 2009, just six months after the Supreme Court's decision, there already were over five thousand lower federal court cases citing *Ashcroft v. Iqbal*. Hundreds of cases had been dismissed that previously would have gone forward.

From the book by Erwin Chemerinsky,

Closing The Courthouse Door pp 175-176

And here is a problem that the Supreme Court needs to reconsider, or Congress needs to address.

REASONS FOR GRANTING THE PETITION

I

Has F.R. Civ. P. 1 been abrogated by judicial fiat?

Petitioner was defrauded of over $750,000.00 in a 'pump and dump' securities fraud by the Respondents. To add insult to injury, the district court awarded the perpetrators over $100,000.00 in sanctions for his "frivolous" pleadings.

Such dishonest use of language is nothing new.

> The bending of the meanings of words is symptomatic of a diseased institution, with the angle of linguistic deflection indicating the seriousness of the cancer within. The Spanish Inquisition represented an advanced case.
>
> *Rawson s Dictionary of Euphemisms and Other Doubletalk,* Revised Edition, page 35 (1995).

> "When *I* use a word," Humpty Dumpty said, in rather a scornful tone, "it means just what I choose it to mean—neither more nor less."
>
> "The question is," said Alice, "whether you *can* make words mean so many different things."
>
> "The question is," said Humpty Dumpty, "which is to be master—that's all."

> *The Annotated Alice: Alice s Adventures In Wonderland & Through The_Looking Glass* by Lewis Carroll 269 (Martin Gardner 1960).

Alice-in-Wonderland was a world in which words had no meaning. *Welch v. United States*, 90 S.Ct. 1792, 1803 (1970).

The Rule is quite plain:

F. R. Civ. P. 1

> These rules govern the procedure in all civil actions and proceedings in the United States district courts, except as stated in Rule 81. They should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding.

It's application is quite the opposite.

JUST?

Hardly. See *Closing The Courthouse Door*, supra. It took Professor Chemerinsky over 200 pages in his book to describe the problems that currently plague our court system.

INEXPENSIVE?

Six figures as a sanction?

SPEEDY?

This case has been in the federal courts since August 27, 2018. Speedy? That's over five (5) years, enough time to ensure that the perpetrators escape the 5 year statute of limitations for most federal criminal statutes, in which John Textor and his fellow fraudsters were protected by the Ninth Circuit Court of Appeals by a deciding panel in case no. 3:18-CV-1037-MMH- MCK in which the fraudsters escaped the consequences of their actions by a ruling that completely ignored the issue of "lulling". 1800 investors lost $124 million in that one (including a $5 million dollar loss by the petitioner).

This is not the way the court system is supposed to work.

> The people have a greater concern in the judicial branch of the Government than in any other. It is to the courts that the people look to protect them in their rights against the Nation or the world. The courts deal with the people in every relation of life from the day they enter the world, and direct the affairs of their estates and guide their hands after death in the distribution of their property. . . .
>
> Congressional Record, June 3, 1930, Volume 72, p. 9988.

At least, this is the popular rhetoric. The reality for *this* litigant was addressed in the same session of Congress:

> Mr. O'CONNOR of New York. . . . I am against the bills to create additional Federal judges, having been consistently against such bills, because I am a

Democrat. Being a Democrat, I can not reconcile my Democratic principles with voting to increase the Federal judiciary when I recall the tyranny of its past and its deplorable present, its interference and usurpation of State and local rights. Nor can I understand how any Democrat can vote for any bill to augment the Federal judiciary. I welcome an opportunity to vote to abolish it. . . .

Mr. BACHMANN. Do I understand the gentleman is opposed to all the judge bills?

Mr. O'CONNOR of New York. Yes.

Mr. BACHMANN. Is the gentleman opposed also to filling the place of Judge Winslow, who resigned in the southern district of New York, and where a successor was stated, in the report of the judicial conference, signed by the late Judge Taft, to be badly needed in the southern district of New York?

Mr. O'CONNOR of New York. Yes, sir. I am opposed to that also. I would rather permit that vacancy to stand as a monument to remind us of the corruption that went on while it was filled, and is still going on in the Federal courts.

Congressional Record, June 3, 1930, Volume 72, p. 9980.

II
Should the Rules Concerning Unpublished Opinions Be Rewritten and/or Modified?

> In addition to keeping the law stable, this doctrine is also essential, according to Blackstone, for the separation of legislative and judicial power. In his discussion of the separation of governmental powers, Blackstone identifies this limit on the "judicial power," i.e., that judges must observe established laws, as that which separates it from the "legislative" power and in which "consists one main preservative of public liberty." 1 Blackstone, Commentaries *258-59. If judges had the legislative power to "depart from" established legal principles, "the subject would be in the hands of arbitrary judges, whose decisions would be then regulated only by their own opinions. . . ." Id. at *259.
>
> *Anastasoff v. U.S.*, 223 F.3d 898, 901 (8th Cir. 2000)

Judges, especially at the federal level, rule by whim and caprice all the time with their unpublished opinions (in the instant case, 'Do Not Publish') all the time, as they have done in every single case this pro se litigant has had experience in.

See list of the appeals court cases of Scott Meide, available on PACER. ***Meide v. Centineo et al***, Case Number: 2:2019cv07171, ***Meide v. Pulse***, Case Number: 3:2018cv01037. Such conduct has not gone unnoticed.

The practice of using unpublished opinions to deprive a litigant of equal protection of the law has been condemned by the watchdogs of our judicial system:

> "The main constraints on federal judges, beyond impeachment, derive from the fact that they must write reasoned opinions that are citable back to them," Minsker adds.

> Unpublished opinions by federal judges—a practice that began less than 20 years ago as an attempt to reduce the judges' workload—comprised 61 percent of the D.C. Circuit's decisions on the merits in the year that ended June 30, 1991. And the D.C. Circuit actually issues such opinions less frequently than do several other federal appeals courts.
>
> Groner, *Bill Pressed to Curb Unpublished Opinions*, Legal Times, page 1 (December 23, 1991).
>
> Controversy about unpublished decisions ebbed and flowed throughout the 1970s and 1980s, with law-review articles and blue-ribbon panels generally condemning the practice.
>
> *Id.* at page 12
>
> ". . . when a decision isn't published and can't be cited, the court becomes free to make unprincipled and inconsistent decisions. Publicity is the most important constraint on the court."
>
> *Id.* at page 13 (quoting ACLU's Arthur Spitzer)

"Discretion" appears to be equally valueless.

> The discretion of a Judge is the law of tyrants: it is always unknown. It is different in different men. It is casual, and depends upon constitution, temper,

passion. In the best it is oftentimes caprice; in the worst it is every vice, folly, and passion to which human nature is liable.

Lord Camden, L.C.J., *Case of Hindson and Kersey*, 8 Howell State Trials 57 (1680).

III
Do We Have a Government Of Laws And Not Of Men (or Women)?

It doesn't seem to be.

American government . . . as Learned Hand warned, [is] government by "Platonic guardians," except that the guardians are not philosophers but lawyers in robes, resolving problems in a disorganized, haphazard way and operating under the embarrassment of claiming to enforce the Constitution.

Graglia, *Interpreting the Constitution: Posner on Bork*, 44 Stanford Law Review 1019, 1021-1022 (1992) (footnote omitted).

Lillian was not present in the courtroom; her attorney made gestures once in a while, with the energy of letting water run through his fingers. They all knew the verdict in advance and knew its reason; no other reason had existed for years, where no standards, save whim, had existed. They seemed to regard it as their rightful prerogative; they acted as if the purpose of the procedure were not to try a case, but to give them jobs, as if their jobs were to recite the appropriate formulas with no

> responsibility to know what the formulas accomplished, as if a courtroom were the one place where questions of right and wrong were irrelevant and they, the men in charge of dispensing justice, were safely wise enough to know that no justice existed. They acted like savages performing a ritual devised to set them free of objective reality.
>
> Ayn Rand, *Atlas Shrugged*, p. 933(1957)

Nowadays, as Professor Chemerinsky points out in his book, the legal system is even more dysfunctional than it was in the days of Learned Hand and Ayn Rand.

> [U]ltimately, the guarantee of [our] rights is no stronger than the integrity and fairness of the judge to whom the trial is entrusted.
>
> *Bracy v. Gramley*, 81 F.3d 684, 703 (7th Cir. 1996) (dissent), *reversed*, 520 U.S. 899, 117 S.Ct. 1793, 138 L.Ed.2nd 97 (1997).

By that yardstick, pro se litigants. and even some of those represented by attorneys have no rights at all.

IV
May A Corporation Assign His Interest In A Lawsuit to A Non-Lawyer?

Lawsuits in Florida can be assigned, as can other property rights. See e.g., *MYD Marine Distributor, Inc. v. International Paint Ltd*. 201 So. 3d 843 (Fla. Dist. Ct. App.

2016).

Plaintiff was informed (by a Florida attorney no less) that his corporation could execute an assignment to him personally. Which he did, the district (and appeals) court ignored the issue and then "threw his case out" after he had hired an attorney (McLean) to comply with the district court's order. I.e., the courts should have addressed the issue.

V

Did the District Court Subject Petitioner To A Piecemeal Appeal?

The court named more than one issue that should have been appealed. I.e., Should Petitioner have been subject to piecemeal appeals? See page 9, Order, *Ebrahimi v. City of Huntsville, Bd., Educ* 114 F 3d 162 (11th Cir. 1997) (policy against piecemeal appeals).

VI

Should Plaintiff Have Been Granted Discovery?

Petitioner's Motion to Compel at the district court level says it all, see Appendix, pg. #25. This Motion was never ruled on.

VII

Were The Sanctions Imposed Unreasonable?

It is unfortunate that the imposition of sanctions does not allow a litigant to contest the issue via a jury trial. No jury in its right collective mind would have imposed sanctions – any sanction whatsoever – in this action.

Petitioner was the *victim* of the Respondents, not the perpetrator.

> The district court also determined that (1) Meide named the Anthonys as defendants "for the improper purpose of harassment," and (2) McLean failed to conduct a reasonable investigation before filing the June 2020 motions for leave to amend and to substitute.
>
> In the same order, the district court granted in part the motions for sanctions filed by the Centineo and Pulse Defendants. The district court determined that (1) Meide reasonably could have believed the claims in his initial complaint were not frivolous, but (2) Meide's amended securities fraud claims against those individual defendants were frivolous and were brought "for the improper purpose of harass[ment]." The district court observed that (1) Meide continued to assert securities fraud claims in his own name without explaining why JIC was not the proper plaintiff

Meide v. Pulse Evolution Corp., No. 22-13404, 6-7 (11th Cir. Dec. 13, 2023)

Note that the same district court that couldn't be bothered with a plainly written Motion to Compel was able to divulge the thought process of an individual who had been the victim of a "pump and dump" scheme ("improper purpose of harassment").

Again, JIC assigned its rights to litigation to Petitioner. For an excellent discussion in re sanctions, see *Amlong Amlong v. Denny s*, 500 F 3d 1230 (11th Cir. 2006).

VIII

Was Petitioner Entitled To An Unbiased Judge?

According to various sources, including case law, apparently not.

The district court judge "found" that Petitioner filed his lawsuit for "purposes of harassment".

Extrajudicial fact-finding by a judge is improper because it cannot be "tested by the tools of the adversary process". *Onishea v. Hopper,* 126 F 3d 1323, 1341 (11th Cir. 1997) (citations omitted).

For an identical issue with (some) identical parties consider the following:

Civ. P. 11(c)(1). "The Rule permits the imposition of sanctions only when the "pleading, motion, or other paper" itself is frivolous, not when one of the arguments in support of a pleading or motion is frivolous." *Golden Eagle Distrib. Corp. v. Burroughs Corp.*, 801 F.2d 1531, 1539 (9th Cir. 1986).

Here, the Textors argue that both the underlying action and the appeal were frivolous. For the underlying action, the Textors contend that "Plaintiffs had no reasonable factual basis to file a claim for violation of the Federal Securities Act," pointing to the Complaint's limited allegations concerning the Textors. The Textors also contend that Plaintiffs acted in bad faith or for an improper purpose, as Plaintiffs primarily sought to spread disinformation about John Textor and drive a forced settlement of a non-existent claim. The Textors cite to two other suits in which Plaintiffs asserted similar claims and allegations, as well as the July 20, 2020 Declaration of John Textor ("Textor Declaration"), which identifies various online sources repeating Plaintiffs' grievances in public

forums.

The Court finds that under the circumstances, sanctions based on the underlying action are not appropriate. Rule 11 requires sanctions where the Complaint itself is frivolous, rather than upon a showing that one particular claim therein is frivolous. See *Golden Eagle*, 801 F.2d at 1539. In dismissing the action, the Court never addressed the sufficiency of Plaintiffs' state law claims nor found them to be frivolous. (See Order, Docket No. 120.) The Textors fail to meaningfully address Plaintiffs' state law claims in moving for sanctions and, as a result, fail to meet their burden. Furthermore, the evidence provided in the Textor Declaration fails to demonstrate that Plaintiffs' Complaint was frivolous. Accordingly, the Court denies the Sanctions Motion.

The same is true for the Appellate Fees Motion. "An appeal is frivolous if the result is obvious, or the arguments of error are wholly without merit." *DeWitt v. W. Pac. R. Co.*, 719 F.2d 1448, 1451 (1983). The Textors argue that Plaintiffs knew their appeal was frivolous, given that this Court's prior orders put Plaintiffs on notice of the frivolous nature of their claims but appealed nonetheless. However, this Court never found Plaintiffs' claims to be frivolous and the Textors fail to show the result of the appeal was obvious. Accordingly, the Court does not find the appeal to be frivolous and denies the Appellate Fees Motion. For the foregoing reasons, the Court grants the Extension Motion but denies the Sanctions Motion and Appellate Fees Motion.

IT IS SO ORDERED.

Scott Meide, et al. v. Noah Centineo, et al., United

States District Court, Central, 2:19-cv-07171-PA-KS (01/22/022)

I.e., the law concerning sanctions means one thing in California and something entirely different in Florida.

This problem of judicial anarchy has not gone unnoticed.

There is a [g]eneral presumption that judges are unbiased and honest. *Ortiz v. Stewart*, 149 F 3d 923, 938 (9th Cir. 1998).

The Founders knew better.

> Show me that age and country where the rights and liberties of the people were placed on the sole chance of their rulers being good men without a consequent loss of liberty! I say that the loss of that dearest privilege has ever been followed, with absolute certainty, every such mad attempt.
>
> Patrick Henry, *Should Liberty or Empire Be Sought* (1788).

> At the establishment of our constitutions, the judiciary bodies were supposed to be the most helpless and harmless members of the government. Experience, however, soon showed in what way they were to become the most dangerous; that the insufficiency of the means provided for their removal gave them a freehold and irresponsibility in office; that their decisions, nevertheless, become law by precedent, sapping, by little and little, the foundations, construction, before anyone has perceived that that invisible and helpless worm has

> been busily employed in consuming its substance. In truth, man is not made to be trusted for life, if secured against all liability to account.
>
> Thomas Jefferson, letter to Monsieur A. Coray, October 31, 1823

As the district court appeared to be.

> I don't want to know what the law is, I want to know who the judge is.
>
> Roy M. Cohn, quoted in *New York Times Book Review*, 3 Apr. 1988, at 24.

An internet source describes "who the judge was".

Comments from The Robing Room:

Comment#:18125
Rating:1.0

> This Judge is very un-professional with extreme outbursts in court. It appears that she feels that she is better than everyone else. Very Narcissistic... She really acts like she can do anything and say anything that she wants without regard for anyone else, any law, or any consequence. Too much Power has gone to her head. God help her....

Comment#:7727
Rating:1.4

> I agree entirely with the poster who stated that Judge Howard is an incredibly biased judge who

> allows her extreme politics to interfere with her ability to be impartial. She is so corrupt that one wonders how she can live with herself. It's astounding that, despite the fact that she is both a woman and a minority, she throws her own under the bus in order to try to gain entry into the good ol' boys club. The self-loathing that she harbors must be eating her up inside.

Comment#:5296
Rating:1.0

> Judge Howard is an extremely right-wing Republican. She does not believe in the United States Constitution, or civil rights. She harbors a deep hatred for disabled veterans, pro se litigants, and women who make EEOC complaints. What is most appalling is that she allows her political views to control her decisions. She is neither fair nor impartial. If you are a fellow Republican she believes that you are above the law and will misuse her authority as a federal judge to cover up your crimes. She can be described most accurately as a highly political Republican judge.

SUMMARY

Sanctions of any sort were – and are – unreasonable.

CONCLUSION

For the reasons set forth above, this petition for a writ

of certiorari should be granted.

Respectfully Submitted,

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