

No. 24-5992

In the Supreme Court of the United States

ANDREW W. BELL,

Petitioner,

v.

FULTON COUNTY, GEORGIA et.al.,

Respondents.

ON PETITION FOR WRIT OF CERTIORARI
TO THE SUPREME COURT OF THE STATE OF GEORGIA

PETITION FOR REHEARING

ANDREW W. BELL

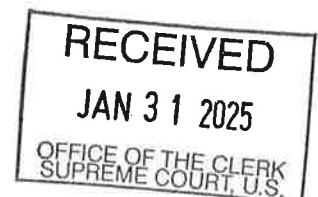
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INTRODUCTION

Petitioner Andrew W. Bell respectfully petitions under Rule 44.2 for rehearing of the Court's January 21, 2024 order denying his petition for writ of certiorari. Andrew W. Bell respectfully requests that the twenty-five (25) day time period to file his Petition for Rehearing be extended for extra time. Petitioner has included a summary of the why he believes his petition for rehearing should be granted. However, Petitioner is only allowed twenty-five (25) days to petition for rehearing. Petitioner petitioned this Court in another case¹ that was before this Court last year. In that case I did not receive notice either by email or mail. The mail system in the Metro Atlanta area experienced multiple problems with its mail delivery service in 2024,² especially after opening United States Postal Service's (USPS) new bulk mail processing center.³ Petitioner was told by the Clerk's office that because the denial date was accessible on to the public via this Court's website⁴ that not receiving mail is not a reason that could be used to waive the twenty-five (25) day deadline for submitting a petition for rehearing. In turn, for this case (Case No. 24-5992) Petitioner monitored the docket for Case No. 24-5992 for this Court's website. Although as of January 25, 2024 he still has not received the written correspondence, he has viewed the January 21, 2025 denial of the Court's website.

¹ Case No. 23-7684

² See Exhibit 1

³ <https://www.ajc.com/news/business/usps-woes-are-years-in-the-making-georgia-members-of-congress-seek-fix/NLYLXCMBABAHRJAKRDLVP5FVQM/>

⁴ Petitioner was not and is not an e-filer

Petitioner is asking for the extra time in lieu of mistake being to his petition due to the minimal amount of time that he will have to prepare his petition and submit it.

Both cases that Petitioner brought before this Court have involved fraud. The first case involved the electoral process on independent candidates in Georgia. The second case involved Petitioner purchasing property from Fulton County Georgia at a Fulton County Georgia Sheriff's tax sale. Petitioner brought to this Court issues concerning the some our, if not our most valuable rights. That being civil rights⁵ and also property rights. The evidence that Petitioner brought before this Court is undeniable, as demonstrated by the Respondents waiver submission in the first case, and the Respondents not responding at all in this case.

BACKGROUND

Petitioner purchased 2478 Stone Road, East Point, GA property at the Fulton County, Georgia Sheriff's tax sale on May 04, 2021. After purchasing the property Petitioner discovered fraud. The property was purchased by Andrew B. Asare on December 01, 1995, from Robert O. Taylor. It appears around February 05, 2006, Andrews B. Asare started the process with the City of East Point, Georgia⁶ to build a subdivision which required his property to be subdivided. For whatever reason Andrews B. Asare never completed the process⁷ to subdivide his lot. Andrews B. Asare only started and completed the preliminary site part of the application.

⁵ The 23-7684 case centered around voters' rights

⁶ The City of East Point is city inside of Fulton County, Georgia with its own jurisdiction.

⁷ <https://www.eastpointcity.org/wp-content/uploads/2022/01/Subdivide-Lot-Combination-Application-Packet.pdf>

Andrews B. Asare never started or completed the minor plat part of the application. Andrews B. Asare never started or completed the final plat process. Andrews B. Asare never was granted permission by the City of East Point to subdivide his property. Andrews B. Asare never petitioned Fulton County Superior Court to subdivide 2478 Stone Road pursuant to O.C.G.A. § 44-2-162 or any other method. Instead of going through the legal process to subdivide his lot, Andrews B. Asare choose to commit fraud. Andrews B. Asare filed fraudulent legal descriptions⁸ on lots that have never existed. The Fulton County Superior Clerk recorded the fraudulent legal descriptions. It appears that Andrews B. Asare did this in order to obtain loans on the fraudulent lots he created.⁹ Respondents even used a deed, that was clearly fraudulent, to make a false claim that 2478 Stone Road had been sold to Baffour Adumattah. Baffour Adumattah was the person who is listed as being the “Owner” on the May 04, 2021 tax deed. Baffour Adumattah was involved in two fraudulent quit claims deed that involve 2478 Stone Road.

The first fraudulent quit claim deed¹⁰ was signed by Andrews B. Asare and Baffour Adumattah on June 18, 2008. See Pet. App. 648a. The property address does not list 2478 Stone Road, East Point, GA 30344. The fraudulent quit claim deed lists the property being sold as 2478 Pearl Street, East Point, GA 30344. Stone Road is approximately two miles from Pearl Street. The fraudulent quit claim deed also has a different parcel Id# than the parcel Id # listed on the May 04, 2021 tax

⁸ See Pet. App. 654a-655a

⁹ See Pet. App. 657a

¹⁰ See Pet. App. 648a

deed. The fraudulent deed has parcel Id# 14-0194-0010-048-4 and the tax deed has a parcel Id# 14-0194-0010-067-4.

Respondents claim the second fraudulent claim deed¹¹ signed on January 08, 2019, corrected the June 18, 2008 quit claim deed. It is impossible that the 2478 Stone Road Property was transferred to Baffour Adumattah, because the title is defective. Andrews B. Asare was required to correct the deed, which he did not. Andrews B. Asare's name or signature is nowhere on the January 08, 2019 deed, and Baffour Adumattah did not go before the Fulton County Superior Court to correct the deed pursuant to O.C.G.A. §§ 44-2-18, 44-2-19 or O.C.G.A. § 44-2-20. The 2019 deed also violates O.C.G.A. § 13-3-40, because According to the Quit Claim deed Baffour Adumattah sold 2478 Stone Road to himself for the sum of \$0, which violates O.C.G.A. § 13-3-40(a)¹².

After learning of the fraud Petitioner filed a petition in Fulton County Georgia Superior Court labeled as "ORIGINAL PETITION FOR THE EJECTMENT AND RESTORATION OF THE 2478 STONE ROAD TITLE TO ITS ORIGINAL BOUNDARIES".¹³ Petitioner also sent Ante Litem notice to the Fulton County Board of Tax Assessors to correct the property boundaries. *See* Pet. App. 659a-664a.

There were a series of decisions that followed including a Complaint against Fulton County and several officials. Fulton County, Georgia Superior Court issued a

¹¹ *See* Pet. App. 651a

¹² A consideration is essential to a contract which the law will enforce. An executory contract without such consideration is called nudum pactum or a naked promise.

¹³ *See* Pet. App. 630a

final order on November 08, 2024. Petitioner filed an appeal pursuant to O.C.G.A. § 5-6-35(j). The appeal was stamped “received” at 2:35 p.m. on November 17, 2023. The Petitioner was never notified that his appeal had been rejected. He returned back to the Supreme Court of Georgia after Fulton Superior Court issued another order on December 13, 2023, which denied Petitioner’s motion for reconsideration, and also stated “The Court dismissed this case with prejudice on 11/8/2023. Thirty days have passed since the ruling and no appeal has been filed.” Petitioner had brought the Complaint against Respondents after his petition for ejectment and the restoration of 2478 Stone Road to its original boundaries was dismissed. Petitioner filed a new lawsuit against the Respondents for the purpose of obtaining compensation for damages he had suffered because there was a road cut through a fraudulent lot 1 that Respondents claimed was the only parcel of land Petitioner had been granted. Petitioner presented facts that 2478 Stone Road was never approved to subdivided by the City of East Point or the Fulton County Superior Court. Petitioner appealed to the Supreme Court of Georgia due to fraud committed against him in the purchase of 2478 Stone Road, East Point, GA 30344 at the Fulton County, Georgia Sheriff sale held on May 04, 2021. O.C.G.A. § 5-6-35(j) did not require Petitioner to file a notice of appeal at the time his appeal was filed. If Petitioner had filed his appeal pursuant to O.C.G.A. § 5-6-34(a) or O.C.G.A. § 5-6-35(a) he would have had 30 days to file a notice of appeal with the Fulton County superior court Clerk’s office, which would have been December 08, 2023. However, O.C.G.A. § 5-6-35(j) required that Petitioner file his appeal first and wait until the

Supreme Court of Georgia grant his application. On April 15, 2024, after Petitioner's appeal had been rejected by the Supreme Court of Georgia, that court amended their Rule 41 (2)¹⁴. The Supreme Court of Georgia changing the Rule 41(2) does nothing to help Petitioner but it does help those who have appeals after the rule was changed. By changing the rule the Supreme Court of the State of Georgia acknowledges the unfairness and confusion of the previous rule.

Although the Petitioner purchased the 2478 Stone Road property on May 04, 2021, the Fulton County Tax Commissioner and the Fulton County Board of Tax Assessors continue to list Beatrice Adumattah, who is the widow of Baffour Addumattah, as the owner of the property. Baffour Adumattah is one of the culprits of the fraud committed against the Petitioner. Petitioner has foreclosed the property at 2478 Stone Road, East Point, GA 30344, and barred the right to redeem to Baffour Adumattah, his heirs, and all other known and unknown persons the right to redeem. *See* Pet. App. 913a-915a.

REASONS FOR GRANTING THE PETITION

When people lie or commit fraud against the courts, it takes away from the foundation and the principles of the Constitution itself. The Preamble of the Constitution states, "*We the People of the United States, in Order to form a more*

¹⁴ "A petition for certiorari must state, separately and distinctly, the question or questions presented by the case which, in the petitioner's view, meet the standard set out in Rule 40 for granting review. The question or questions should be set out under a separate heading at the beginning of the petition, before the table of contents, table of authorities or introduction."

perfect Union, establish Justice, insure domestic Tranquility, provide for the common defense, promote the general Welfare, and secure the Blessings of Liberty to ourselves and our Posterity, do ordain and establish this Constitution for the United States of America.

Having served my country honorably in the United States Marine Corps, I am really starting to feel like a “sucker”. After going through an arduous journey on an election case and now a property rights case, and after appealing to this Court on two occasions for relief. Along with other systematic issues with the so-called justice system that have plagued not only my community but also communities similar to mine, I have become disheartened at obtaining justice through the system(s) of justice set up in this country. The evidence I submitted to support my claims is undeniable.

Petitioner went to a public auction held by the Fulton County, Georgia Sheriff. Petitioner had the winning bid on May 04, 2021, for the 2478 Stone Road, East Point, GA property. The property still has the original home and two smaller structures as depicted in one of the exhibits.¹⁵ Petitioner discovered the fraudulent deeds and legal descriptions. Petitioner brought forth his findings to the Fulton County Board of Tax Assessors and to the Fulton County Georgia Superior. Instead of the Truth and Justice prevailing, lies and fraud prevailed. Which did not promote the general welfare, and it definitely did not promote Justice, domestic Tranquility,

¹⁵ See Pet. App. 658a

or Secure the Blessing of Liberty to ourselves and definitely not to Petitioner.

Neither did it promote our posterity.

The Fifth and Fourteenth amendments of the Petitioner were violated. Although Petitioner filed a timely appeal, with the Supreme Court of the State of Georgia, in accordance with O.C.G.A. § 5-6-35(j), his appeal was not docketed. There was no reason given to why Petitioner's application for appeal was not docketed. When Petitioner asked why his petition was not returned he was told it was because he paid cash. The Supreme Court of Georgia changed its rules on April 15, 2024, after Petitioner's appeal had been rejected by the Supreme Court of Georgia, that court amended their Rule 41 (2)¹⁶.

At this time this Court is the only hope and opportunity for the Petitioner to receive justice.

For the aforementioned reasons stated above, the petition for rehearing should be granted.

Respectfully submitted on January 27, 2025.


Andrew W. Bell
P.O. Box 82348

¹⁶ "A petition for certiorari must state, separately and distinctly, the question or questions presented by the case which, in the petitioner's view, meet the standard set out in Rule 40 for granting review. The question or questions should be set out under a separate heading at the beginning of the petition, before the table of contents, table of authorities or introduction."

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EXHIBIT 1

Georgia news

Oct. 8, 2024

USPS STATEMENT ON GEORGIA OPERATIONS AND HURRICANE HELENE RECOVERY AS OF OCTOBER 7, 2024

GEORGIA — Hurricane Helene was a catastrophic natural disaster that has disrupted services and operations for many organizations – including the Postal Service's ability to deliver mail and packages - throughout the entire Southeast region. The Postal Service is working closely with other federal agencies, including FEMA, to assist in the response. The Postal Service's primary focus is to maintain the safety and security of our employees and to ensure that Americans receive their mail and packages as swiftly as possible.

USPS Operations In Georgia Are Resuming But Full Recovery May Take Time

Our operations team has worked around the clock to restore operations wherever safely possible however there is significant work to be done to deliver a backlog of mail and packages and reopen routes in the areas hit hardest by Hurricane Helene. The full recovery of service to the area may stretch forward for some time.

As of Oct. 7, all USPS Georgia processing facilities and most retail and delivery units have reopened. Where retail and delivery units remain inaccessible, we have relocated operations to nearby units and are further deploying mobile retail units to make sure we can provide retail and delivery services to impacted communities as quickly as possible.

We remain committed to delivering mail wherever it's feasible and safe, constantly adjusting our operations for a swift restoration of services. For the latest updates on our services, please visit our Service Alerts page [here](#).

Impact On Georgia USPS Operations

The Postal Service operates 742 facilities in Georgia. Local areas using three-digit ZIP Codes beginning in 304, 308, 309, 315, and 316 were the most severely impacted by Hurricane Helene. USPS teams have been dispatched to affected areas where possible and are working to get into other areas which remain inaccessible so far. As of October 7:

- **738 postal facilities reopened**, however, 4 retail sites still remain closed. The operations from these closed facilities are in the process of being transferred to other locations.
- **1 facility destroyed**: Lakeland Post Office cooped to Naylor Post Office
 - 0 facilities with flooding, 6 facilities without power
- **All impacted delivery offices** are attempting delivery where safe to do so
- **13 Retail Offices** offering cash only transactions.
- **Sunday delivery** made in some affected offices.
- **Approximately 153 offices have reported 2,307, 969 pieces of mail delayed** by Hurricane Helene. Backlog as of October 7 is 55,134 pieces.
- All mail destined for Georgia that cannot be delivered is being sent to the destinating **Local Post Office** where it will be delivered where safe to do so
- **7,548 addresses are currently unreachable** due to displacement or inoperable routes.
- **An estimated 0 routes are currently inoperable** down from 3,351 after the initial impact of the storm.
- Replacement vehicles are being sent to local post offices that suffered vehicle damage, enabling them to resume delivery services as quickly as possible.

Resources For Georgia Residents

- For impacted residents who have relocated due to the storm, be sure to complete a change of address request at moversguide.usps.com.
- For impacted residents currently in a temporary shelter, USPS employees will be on site this week to assist with change of address requests to ensure mail and packages are sent to a designated address.
- Available Social Security checks that have arrived are being delivered to all units for delivery and/or available for customer pick up.

###

The United States Postal Service is an independent federal establishment, mandated to be self-financing and to serve every American community through the affordable, reliable and secure delivery of mail and packages to 169 million addresses six and often seven days a week. Overseen by a bipartisan Board of Governors, the Postal Service is implementing a 10-year transformation plan, [Delivering for America](#), to modernize the postal network, restore long-term financial sustainability, dramatically improve service across all mail and shipping categories, and maintain the organization as one of America's most valued and trusted brands.

The Postal Service generally receives no tax dollars for operating expenses and relies on the sale of postage, products and services to fund its operations.

For USPS media resources, including broadcast-quality video and audio and photo stills, visit the [USPS Newsroom](#). Follow us on [X](#), formerly known as Twitter; [Instagram](#); [Pinterest](#); [Threads](#) and [LinkedIn](#). Subscribe to the [USPS YouTube Channel](#) and like us on [Facebook](#). For more information about the Postal Service, visit [usps.com](#) and [facts.usps.com](#).

Media contacts

Tiffany Rowland

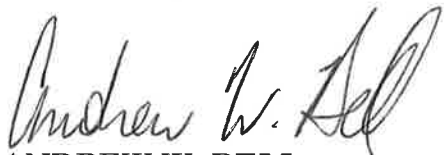
tiffany.c.rowland@usps.gov



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CERTIFICATION OF COUNSEL

As counsel of record for Petitioner, I certify that this petition for rehearing is restricted to the grounds specified in Rule 44.2 and is presented in good faith and not for delay.



ANDREW W. BELL

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CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing was sent this 27th day of January 2025,
by U.S. mail to the Respondents in this case.

No. 24-5992

IN THE

SUPREME COURT OF THE UNITED STATES

ANDREW W. BELL — PETITIONER
(Your Name)

VS.

FULTON COUNTY, GEORGIA et al. — RESPONDENT(S)

PROOF OF SERVICE

I, Andrew W. Bell, do swear or declare that on this date, January 27, 2025, as required by Supreme Court Rule 29 I have served the enclosed PETITION FOR REHEARING on each party to the above proceeding or that party's counsel, and on every other person required to be served, by depositing an envelope containing the above documents in the United States mail properly addressed to each of them and with first-class postage prepaid, or by delivery to a third-party commercial carrier for delivery within 3 calendar days.

The names and addresses of those served are as follows:

Fulton County, Georgia; Fulton County Board of Tax Assessors; Fulton County Sheriff Patrick Labat; Fulton County Clerk Che Alexander; Fulton County Tax Commissioner Arthur E. Ferdinand; (141 Pryor St; Atlanta, GA 30303); former Fulton County Clerk Cathlene Robinson (4550 Investors Lane, Ellenwood, GA 30294); former Fulton Clerk Juanita Hicks (205 Devilla Ct., Atlanta, GA 30349); Judge Kimberly Adams (185 Central Ave S.W., Courtroom 4E, Chambers: 4905, Atlanta, GA 30303); Andrews B. Asare (86244 Peebles Rd. Yulee, FL 32097); Beatrice Adumattah (4075 Waterhole Ct, Douglasville, GA 30135); Marina Lopez & Jose Lux (6714 Bells Ferry Road, Woodstock, GA 30189); Webster Richards & Mark Richards (14618 227 Street, Queens, NY 11413)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 27, 2025


(Signature)