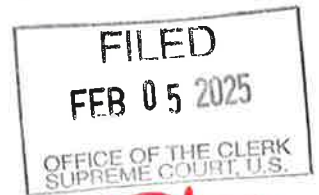


ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES



JUAN M. CRUZADO - LAUREANO
Petitioner-Pro-Se

No. 24-5999

On Petition for Writ of Certiorari to the
U.S. Court of Appeals for the First Circuit
Case- #23-1640

Vs.
US ATTORNEY'S OFFICE FOR THE
DISTRICT OF PUERTO RICO
Respondent

REVISED PETITION FOR REHEARING

Appears before this Honorable Supreme Court of the United States, Juan Manuel Cruzado-Laureano exercising his right to legal self-representation (Pro-Se), Expose and Request:

- 1- On December 17, 2024, the Petitioner received a notification dated December 13, 2024 from Solicitor General Elizabeth B. Prelogar presenting the WAIVER of the right to answer Certiorari #24-5999 as legal representative of the Respondent, the Office of the US Attorney of PR.
- 2- On January 17, 2025, the Petitioner for Certiorari #24-5999 received by regular mail the Order of the Court dated January 13, 2025, which reads as follows:

*"The Court today entered the following order in the above-entitled case:
The petition for a writ of certiorari is denied."*
- 3- The Request for REHEARING regarding the refusal to evaluate Certiorari #24-5999 was filed on Wednesday, February 5, 2025, in compliance with 25-day term

provide by Rule 44 of the Court. The REHEARING Petition filed on February 5, 2025 was returned by the Office of the Clerk with a notification dated February 18, 2025, indicating that said *Petition* does not comply with the provisions of Court Rule 44. The *revised* Petition for Rehearing is being submitted today, Wednesday, March 5, 2025, complying with the 15-day deadline provided.

QUESTION PRESENTED FOR COURT REVIEW IN THIS REVISED
PETITION FOR REHEARING

Does the WAIVER of the Appellees to respond to Certiorari #24-5999, pursuant to *Rule 15(1)(2)* of this Court, imply that the WAIVERS recognizes the legal validity of the Petitioner's claims in said Certiorari?

BACKGROUND OF CERTIORARI #24-5999



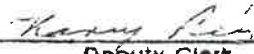
Certiorari #24-5999 arises from the refusal of the First Circuit of Appeals on August 19, 2024 to reconsider the *Judgment* in Appeal #23-1640, where it confirms the *summary dismissal* of Complaint #22-1181(MAJ) for Violation of Civil Rights under "*Biven Action Law*", due to the professional misconduct perpetrated by *US Attorney of PR Guillermo Gil Bonar* and *AUSA Rebecca Kellogg* in the process where they obtained conviction #01-690(JAF) of June 7, 2002 against the Petitioner. The Appellees, acting as the main figures of the Office of the US Attorney of PR in the years 2001-2002, committed the largest and most serious acts of professional misconduct committed by federal official in the exercise of their functions, in the entire history of the US Department of Justice. Never before in the history of the US Department of Justice has a US District Attorney, responding to his personal political interest, personally convened a Grand Jury to hear a political complaint against an elected official.

Never before had a US District Attorney acted as "attorney for the government"

in the determination of cause by a Grand Jury and never before had the "True Bill" of the ***Indictment*** produced been validated only with the exclusive signature of the US Attorney of PR in 2001, Guillermo Gil Bonar.

The ***"True Bill"*** of Indictment #01-690 of October 24, 2001, the only one existing in the 93 Federal Judicial Districts of the United States that with the only the signature of the US District Attorney of PR Guillermo Gil, acting as the sole ***"attorney for the government"*** before the Grand Jury that issued said Indictment, was used to arrest, prosecute and imprison the Petitioner for 5 years. Never before in the entire federal judicial history of the US has a US District Attorney been assigned the function of personally supervising the probable cause determination of a Grand Jury and signing the ***"True Bill"*** of the Indictment issued.

The ***"True Bill"*** of Indictment #01-690 of October 24, 2001

13 Indictment U.S. v. Juan Manuel Cruzado Laureano a/k/a Manny
acts of extortion by defendant Juan Manuel Cruzado Laureano a/k/a Manny.
All in violation of Title 18 United States Code Section 1512(b)(1)(2) .
<div style="text-align: right;">TRUE BILL,  FOREPERSON Dated: 10/24/01</div> <div style="text-align: left;"> GUILLERMO GIL United States Attorney Dated: 10/24/01</div>
<div style="border: 1px solid black; padding: 5px;"><p>Certified to be a true and exact copy of the original.</p><p>FRANCES RIOS DE MORAN, CLERK U.S. District Court for the District of Puerto Rico</p><p>By:  Deputy Clerk</p><p>Date: 10-24-01</p></div>

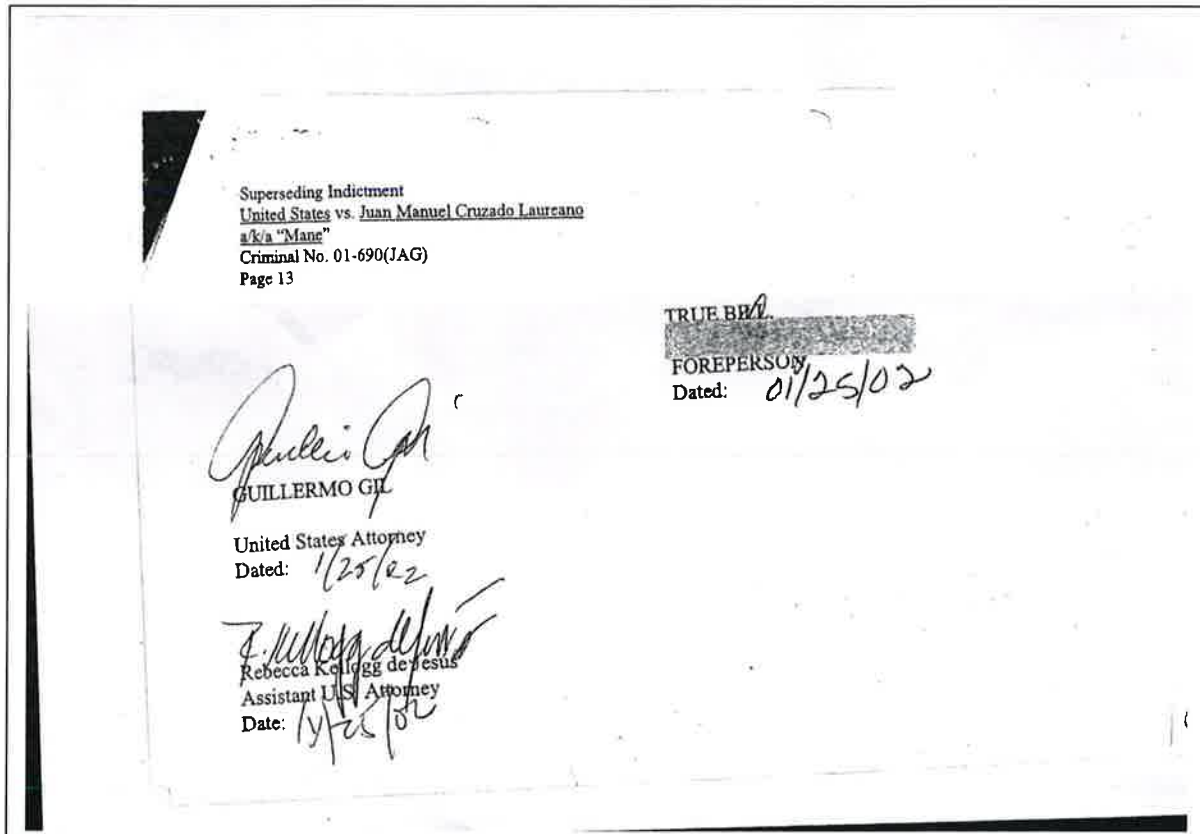
The US Attorney of PR Guillermo Gil Bonar lied before the Court when he presented Indictment #01-690 of 10-24-2001.

The US Attorney of PR Guillermo Gil Bonar lied to the Federal Magistrate who validated Indictment #01-690 of October 24, 2001, by filling said *Indictment* with his sole signature on the "*True Bill*", alleging that he was the only "*attorney for the government*" before the Grand Jury that determined probable cause against the Petitioner. Gil Bonar hid from the Federal Magistrate that alongside him in supervising the Grand Jury, was the *AUSA Lynn Doble Salicrup* from the latter's second summons in the process of determining cause against the Petitioner. The Federal Magistrate would not validated Indictment #01-690 of 10/24/2001, if he had known that the *AUSA Lynn Doble Salicrup* participated in the supervision of the determination of probable cause against the Petitioner.

IN THE UNITED STATES DISTRICT COURT - 2 P-25	
FOR THE DISTRICT OF PUERTO RICO	
UNITED STATES OF AMERICA	
Plaintiff,	
Vs.	
JUAN M. CRUZADO LAUREANO,	
Defendants.	Hato Rey, Puerto Rico October 2, 2001
TESTIMONY OF: BRENDA DÍAZ	
GRAND JURY INVESTIGATION BEFORE THE GRAND JURY FEDERAL BUILDING, HATO REY	
APPEARANCES	
FOR THE PLAINTIFF:	Guillermo Gil Bonar, Esq. Lynn Doble Salicrup, Esq.
COURT INTERPRETER:	

Never before in the history of the US Department of Justice had an Indictment been amended and replace by an AUSA who did not participate as *“attorney for the government”* before the Grand Jury that issued it.

“True Bill” of Superseding Indictment 01-690(GAG) of January 25, 2002 against Juan Manuel Cruzado Laureano



On January 25, 2002, AUSA Rebecca Kellogg De Jesús appeared before Magistrate Gustavo A. Gelpí (GAG) to modify (with three new Counts) and replace Indictment #01-690 of 10-24-01 which contained 11 Counts. The AUSA Rebecca Kellogg had not attended the Grand Jury that issued Indictment #01-690 of 10-24-01 with 11 Counts, whose True Bill was only signed as representative of the government by the US Attorney of PR Guillermo Gil Bonar. The person who acted as attorney for the government before the Grand Jury that issued Indictment #01-690 of 10-24-2001 was **AUSA Lynn Doble Salicrup** and therefore the only who could ask the Court for its amendment and replacement. AUSA Rebecca Kellogg could not be authorized to amend and replace Indictment 01-690 of 10-24-2001, because she had not supervised the Grand Jury in determining the cause that issued said *Indictment*.

Never before in federal judicial history has a US District Attorney been in charge of presenting and defending the charges of an Indictment before the Jury in a Criminal Trial.

The US Attorney of PR Guillermo Gil Bonar has been the only in the judicial history of the US who has been in charge of the presentation and defense of the COUNTS of an Indictment before the Jury in a criminal trial. The Jury Trial of the accusations contained in Indictment #01-690 of October 24, 2001 against the Petitioner was carried out under supervision of Federal District Judge José A. Fusté beginning in May 2002. Surprisingly, at the beginning of Criminal Trial 01-690(JAF), PR US Attorney Guillermo Gil Bonar, appeared as one of the applicant prosecutors in the case. Never before had a US District Attorney been in charge of presenting and defending before the Trial Jury criminal indictment that he had personally obtained from a Grand Jury. Establishing an illegal precedent, the US Attorney of PR Guillermo Gil Bonar was in charge of presenting the ***Counts*** of Indictment #01-690 of 10-24-2001 before the Jury that attended the Trial #01-690(JAF) of June 7, 2002. Although USA Gil Bonar had brought AUSA Rebecca Kellogg on January 25, 2002 to the allegations of Indictment #01-690 of 10-24-2001, creating Superseding Indictment #01-690(GAG) of January 25, 2002 by filling 3 new Counts to the Grand Jury that issued the original 11 Counts, Gil Bonar could not allow AUSA Kellogg to be in charge of presenting the Counts to the Jury, because it did not act as ***attorney for the government*** before the Grand Jury that issue Indictment #01-690 of 10-24-2001. The US Attorney of PR Guillermo Gil Bonar, by obtaining conviction 01-690(JAF) of June 7, 2002 managed to establish a precedent in the federal judicial system, by being the first US District Attorney who obtained a conviction from a Jury, acting as “prosecutor” in the presentation and defense of the indictments issued by the Grand Jury.

The WAIVER of January 26, 2022 to answer Certiorari #21-6910: The first time in its history that the US Department of Justice avails itself of the WAIVER under Rule 15 of this Court to not answer a certiorari, where the legal validity of conviction #01-690(JAF) of June 7, 2002 is challenged.

IN THE SUPREME COURT OF THE UNITED STATES	
CRUZADO-LAUREANO, JUAN MANUAL Petitioner	No: 21-6910
vs.	
W. STEPHEN MULDROW	
<u>WAIVER</u>	
The Government hereby waives its right to file a response to the petition in this case, unless requested to do so by the Court.	
	ELIZABETH B. PRELOGAR Solicitor General <u>Counsel of Record</u>
January 26, 2022	
cc:	
JUAN MANUAL CRUZALDO-LAUREANO PO BOX 405 VEGA ALTA, PR 00692	

Certiorari #21-6910 has its origin in the dismissed Mandamus Order #19-2142 of December 19, 2019 against the Office of the US Attorney of PR. In said *Mandamus*, the Petitioner requests that the withdrawal of Indictment #01-690 of 10-24-2001 be ordered, for being in violation of Rule 7 of Federal Criminal Procedure and for the professional misconduct of US Attorney of PR Guillermo Gil Bonar, sole signatory of the "*True Bill*" of said *Indictment*. The reaction of the US Department of Justice to the Court's request to answer Certiorari # 21-6910 filed Pro-Se by the Petitioner is unprecedented. On January 26, 2022, Solicitor General Elizabeth Prelogar, in legal representation of the US Attorney's Office of PR, RESIGNED to answer Certiorari #21-6910, establishing a precedent in the history of the US Department of Justice. With the WAIVER to defend the conviction 01-690(JAF) of June 7, 2002, its validity challenged in Certiorari #21-6910, its legal invalidity is admitted.

Response of the Appellees to Certiorari #24-5999: WAIVER based on
Court Rule 15(1)(2)

On November 14, 2024, the Petitioner filed Certiorari #24-5999 where he requests the US Supreme Court to revoke the Judgment in favor of the US Department of Justice in Appeal #23-1640 of the First Circuit of Appeals. On December 13, 2024, Solicitor General of the US Department of Justice Elizabeth B. Prelogar presents her WAIVER to answer Certiorari #24-5999, representing the Office of the US Attorney of PR. In Certiorari 24-5999, the US Department of Justice once again avails itself of Rule 15(1)(2) of the Court and WAIVES to defend the accusations of professional misconduct of US Attorney of PR Guillermo Gil Bonar and AUSA Rebecca Kellogg in the achievements of the illegal conviction 01-690(JAF) of June 7, 2002. The historic WAIVER of the US Department of Justice to respond to the Certiorari 24-5999 before the US Supreme Court, the second waiver before this Court to answer a certiorari related to the illegal conviction 01-690(JAF) of June 7, 2002.

IN THE SUPREME COURT OF THE UNITED STATES	
LAUREANO, CRUZADO JUAN MANUEL Petitioner	No: <u>24-5999</u>
vs.	
UNITED STATES ATTORNEY OFFICE, DISTRICT OF PUERTO RICO	
<u>WAIVER</u>	
The Government hereby waives its right to file a response to the petition in this case, unless requested to do so by the Court.	
ELIZABETH B. PRELOGAR Solicitor General <u>Counsel of Record</u>	
December 13, 2024	
cc:	
JUAN M. CRUZADO LAUREANO PO BOX 405 VEGA ALTA, PR 00692	

**REASONS FOR HONORING THIS REVISED PETITION FOR
REHEARING OF CERTIORARI #24-5999**

The WAIVER to answer Certiorari #24-5999 submitted by Solicitor General Elizabeth B. Prelogar dated *December 13, 2024*, relying on Rule 15(1)(2) of this Court, is the second time that the US Department of Justice WAIVES to answer a *certiorari* based on said Rule 15(1)(2). The first occasion of this unprecedented WAIVERS to answer a *Certiorari* was on *January 22, 2022* when they waived to answer Certiorari #21-6910. Never before in the history of the US Department of Justice, said agency had relied on Rule 15(1)(2) of this Court to not answer two *Certioraris* where the legal validity of a criminal conviction achieved before a Jury is challenged. The US Department of Justice avails itself of Rule 15 (1)(2) of this Court and WAIVES to answer two *Certioraris*, #21-6910 and #24-5999, both originated in conviction #01-690(JAF) of June 7, 2002 against the Petitioner, which was the product of an *Indictment* whose determination of cause was directed and supervised exclusively by the US Attorney of PR at that time, Guillermo Gil Bonar. The US Attorney Gil Bonar was not only personally in charge of supervising probable cause before the Grand Jury, but also in charge of presenting and defending the Indictment charges in the Jury Trial where conviction 01-690(JAF) was determined.

In Certiorari #24-5999 the US Department of Justice again invokes Rule 15(1)(2) of this Court and WAIVES to answer it. In this Second Waiver the US Department of Justice refuses to defend the acts of professional malpractice charged in Certiorari #24-5999 to US Attorney of PR Guillermo Gil Bonar and his assistant, AUSA Rebecca Kellogg, to obtain conviction #01-690(JAF) of June 7, 2002 against the Petitioner. In Certiorari #24-5999, financial compensation is claimed, under "*Biven Action Law*", for the acts of professional misconduct to obtain conviction #01-690(JAF) perpetrated by the US

Attorney of PR Guillermo Gil and his special assistant the AUSA Rebecca Kellogg. The financial claim under "*Biven Action Law*" for violation of the Petitioner's constitutional civil rights again two federal officials of this category has never occurred before. It is the first time that a US District Attorney and his top assistant have been sued under *Biven Action Law*, for their personal participation in the fabrication of accusations that culminated in prison for him Petitioner. With this WAIVER of December 13, 2024 to answer Certiorari #24-5999, the US Department of Justice recognizes the acts of professional misconduct of US Attorney Guillermo Gil Bonar and his special assistant, AUSA Rebecca Kellogg, to obtain the illegal conviction #01-690(JAF) of June 7, 2002 against the Petitioner.

Can the Appellees' WAIVER under Rule 15(1)(2) of this Court to answer Certiorari #24-5999 be interpreted as an admission of guilt regarding the claims of professional misconduct against them outlined in said *Certiorari*?

Without a doubt, Rule 15(1)(2) of this Court is very clear and precise about the consequences of availing yourself of the WAIVER under said Rule for not answering a certiorari where the Court requests a reply from the Respondent. It goes like this: (emphasis ours)

SUPREME COURT RULE 15

Rule 15. Briefs in Opposition: Reply Briefs; Supplemental Briefs

Rule 15 (1) (2)- Briefs in Opposition

1. A brief in opposition to a petition for a writ of certiorari may be filed by the respondent in any case, but is not mandatory except in a capital case, see Rule 14.1(a), or when requested by the Court.
2. A brief in opposition should stated briefly and in plain terms and may not exceed the word or page limitations specified in Rule 33. In addition to presenting other arguments for denying the petition, the brief in opposition

should address any perceived misstatement of fact or law in the petition that bears on what issues properly would be before the Court if certiorari were granted. Counsel are admonished that they have an obligation to the Court to point out in the brief in opposition, and not later, any perceived misstatement made in the petition. Any objection to consideration of a question presented based on what occurred in the proceedings below, if the objection does not go to jurisdiction, may be deemed waived unless called to the Court's attention in the brief in opposition. A brief in opposition should identify any directly related cases that were not in the identified in the petition under Rule 14.1(b)(iii), including for each such case the information called for by Rule 14.1(b)(iii).

FOR ALL OF THE ABOVE, this Honorable US Supreme Court must proceed with the **REVISED PETITION FOR REHEARING** of **Certiorari #24-5999**, which was denied on January 13, 2025. This Honorable Court has before it a very particular and unprecedented situation: The US Department of Justice, for first time in its history, has twice invoked **Rule 15** of this Court to not respond to questions in two **Certioraris** on the acts of professional misconduct perpetrated in pursuit of **conviction 01-690(JAF) of June 7, 2002** against the Petitioner by a US District Attorney and his main assistant. If the **RECONSIDERATION** is heard, this Court would have the opportunity to determine if whoever **WAIVES** to answer a certiorari, taking advantage of **Rule 15(1)(2)** of this Court, is recognize the reason of the Petitioner for certiorari. It is necessary for this Court to clarify the scope of a **WAIVER** to answer a certiorari under **Rule 15(1)(2)** thereof. In **Certiorari #24-5999** the US Department of Justice again invokes **Rule 15(1)(2)** of this Court and **WAIVES** to answer it. In this **Second Waiver** the US Department of Justice refuses to defend the acts of professional malpractice charged in **Certiorari #24-5999** to US Attorney of PR Guillermo Gil Bonar and his assistant, AUSA Rebecca Kellogg, to obtain **conviction #01-690(JAF) of June 7, 2002** against the Petitioner. It is very respectfully requested that the ***Judgment*** of the **Appeal**

#23-1640 issued on June 20, 2024 be revoked. The *summary dismissal* of Complaint #22-1181(MAJ) as well as the designation of “*vexatious litigant*” against the Petitioner in the Court of First Instance, be revoked. This Honorable Court must order the Court of First Instance to continue with the airing of Complaint #22-1181 (MAJ) requiring the Appellees to answer said claim. The Petitioner has the right to have the Defendant respond to Complaint #22-1181(MAJ) and discovery of evidence, as in any civil rights lawsuit.

CONCLUSION

This Revised Rehearing Petition must be honored and thus this Honorable Court would demonstrate that the provisions of Rule 15(1)(2) of this Court, *IS NOT DEAD LETTER*.

Respectfully submitted,



Juan Manuel Cruzado Laureano (Pro-Se)

P.O.Box 405, Vega Alta, PR 00692

Dated: March 5, 2025

The filing of this of Petition For Rehearing was done by postal mail by sending it from the US Post Office, Vega Alta, PR 00692 office to the address: CLERK, SUPREME COURT of the UNITED STATES, Washington, D.C. 20543.

PROOF OF SERVICE

I, Juan Manuel Cruzado-Laureano, do swear or declare that on this date, March 4, 2025, as required by the US Supreme Court Rule 29 I have served the enclosed REVISED PETITION FOR REHEARING on each party 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 US Mail properly addressed to each of them and with first-class postage pre-paid.

The name and address of the person is as follows:

- 1- *Solicitor General of the United States, Room 5614,
Department of Justice, 950 Pennsylvania Ave. N.W.
Washington, D.C. 20530*
- 2- US Attorney's Office of Puerto Rico

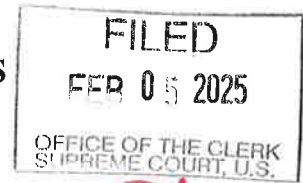
Torre Chardón, Suite 1201, 350 Carlos Chardon Ave., San Juan, PR 00918

ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES

JUAN M. CRUZADO - LAUREANO
Petitioner-Pro-Se

No. 24-5999



On Petition for Writ of Certiorari to the
U.S. Court of Appeals for the First Circuit
Case- #23-1640

Vs.
US ATTORNEY'S OFFICE FOR THE
DISTRICT OF PUERTO RICO
Respondent

CERTIFICATION OF APPLICATION IN GOOD FAITH

Appears before this Honorable Supreme Court of the United States, Juan Manuel Cruzado-Laureano exercising his right to legal self-representation (Pro-Se), with a Revised Rehearing Request on the Court's refusal to consider Certiorari #24-5999. The Rehearing Request is made in good faith and based on the important issues raised in the question submitted. This Request is not intended to delay or hinder the provision on its merits by the Court of Certiorari #24-5999 submitted.

IN MANATÍ, PUERTO RICO TODAY March 4, 2025

JUAN M. CRUZADO LAUREANO

PO BOX 405, VEGA ALTA, PR 00692 TEL: (787) 371-4373

AFFIDAVIT # 2,580

Sworn and signed before me, in Manatí, PR,
today March 4, 2025.

Luz Rodríguez Vélez (Lawyer-Notary)

