

No. _____

**In The
Supreme Court of the United States**

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MICHAEL HUCUL, et al.,

Petitioners,

v.

SYLVIA MATHEW-BURWELL, et al.,

Respondents.

◆

**On Petition For Writ Of Certiorari
To The United States Court Of Appeals
For The Ninth Circuit**

◆

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1) Does the Rooker-Feldman Doctrine bar the District Court's review of Petitioner's Complaint to determine if divorced or separated Parents with joint custody of their child who provide a home, medical insurance, food, clothing and access to education for their child and do not receive Government assistance such as ADFC or TANF, are to be considered "absent", "non-custodial" Parents for the purposes of child support payments under Section D of Title IV of the Social Security Act? (42 U.S.C. §§651-670)

2) Does the Rooker-Feldman Doctrine bar the District Court's review of Petitioner's Complaint due to injuries that were independent from the state-court judgments made by Defendants who were nonparties to the state-court judgments; to determine if these state-court judgments were procured by fraud, unjust enrichment, misrepresentations and other improper means, and for declaratory and injunctive relief from the injuries brought on by the threat of future unconstitutional enforcement actions of Federal regulations, State laws and customs, and when Petitioners are denied their civil rights and equal rights in the State of California Courts and to remove these proceedings to the District Court under 28 U.S.C. § 1443, and as a class action under 28 U.S.C. § 1453?

QUESTIONS PRESENTED – Continued

3) Does the Rooker-Feldman Doctrine bar the District Court's review of statutes 42 U.S.C. §654(7) that provide Federal funds to the salaries of Defendants Honorables Michael D. Washington and R. George Economy based on their performances of ordering child support and determine if these provisions violate 28 U.S.C. §455(a)(b)(4) and Petitioner's rights under the Due Process Clause of the Fifth and Fourteenth Amendments to the United States Constitution?

4) In 2014, with 42 U.S.C. § 658a(b)(5)(C), 1.9 billion dollars in non assisted Title IV-D Federal incentives was paid to the State of California, in 2004 it was 346 million dollars, a 500% increase, and Michigan was paid 956 million dollars in 2014. This Court in *Sullivan v. Stroop* 496 U.S. 478 (1990) ruled that child support was paid "exclusively" by the "absent" Parent. If the States of California and Michigan, through their child support agencies changed Petitioner's status, and those similarly like him, from one who is a non-absent Parent with joint custody of his child, to one as an absent, non-custodial Parent without a hearing or notification to Petitioner(s) for the purposes of collecting more Federal incentives, does the Rooker-Feldman Doctrine bar the District Court's review to determine if this is fraud that violates 18 U.S.C. § 495?

QUESTIONS PRESENTED – Continued

5) Did the Rooker-Feldman Doctrine bar the District Court's review of Petitioner's Complaint to determine if there is (1) . . . an elaborate financial or regulatory nexus between [Defendants] that compels their "custom" of ordering "Fathers" to pay child support, (2) an assumption by [Defendants] of a traditional public function, or (3) a symbiotic relationship involving the sharing of profits?

6) Did the Rooker-Feldman Doctrine bar the District Court's review of the States of California and Michigan laws that are mandated by Federal laws to determine if these laws are unconstitutionally vague and if the States have customs under these State and Federal laws that discriminate against Petitioner(s) as a Parent(s) and as a Father(s)?

7) Did the Rooker-Feldman Doctrine bar the District Court review of Petitioner's Complaint to determine if there is an invidiously discriminatory animus towards Fathers to pay child support, and because there are Federal funds involved, does this violate 42 U.S.C. §§ 2000d, 2000d-7 and eliminate any immunity for State Defendants the State of California, the State of Michigan and their Governors, as Defendant Governors approve their State's child support plans to receive Federal Funds under 42 U.S.C. §658a?

QUESTIONS PRESENTED – Continued

8) Did the Rooker-Feldman Doctrine bar the District Court's review of the Congressional hearings that establish our child support laws to determine if these hearings created and or maintained an invidiously discriminatory animus towards Fathers and Parents?

9) Did the Rooker-Feldman Doctrine bar the District Court's review of Appendix E to determine if the Congressional Defendants' letter to President Clinton was a letter outside the protection of the Speech and Debate Clause that subjects the Congressional Defendants as State actors under 42 U.S.C. § 1983, because of discrimination towards Fathers/Parents?

10) Did Defendants Kronzek & Cronkright, P.L.L.C. and Attorney Charles M. Kronzek (Kronzek) commit "extrinsic fraud" when they presented documents to the Michigan Court where one of the documents was inadvertently signed by the Michigan Court into an order without a hearing preventing Petitioner from defending the document? And if so, is the District Court barred by the Rooker-Feldman Doctrine to review it under Rules of Civil Procedure Rules 9(b) and 60(b)?

11) Is there "extrinsic fraud" when Petitioner's Attorneys, Defendants Gower and Bluck Law and Mediation and Attorney Samuel Bluck, (Bluck) signed orders from the California Court without Petitioner's knowledge or consent, preventing Petitioner from seeing his son and from defending these actions in

QUESTIONS PRESENTED – Continued

Court? And if so, does the Rooker-Feldman Doctrine bar the District Court's review of these actions under the Rules of Civil Procedure Rules 9(b) and 60(b)?

12) When Petitioner's new Attorney, Defendants the Law Office of Steven M. Bishop and Attorney Steven M. Bishop, (Bishop) acknowledged the California orders were signed by Bluck and were done without the Petitioner's knowledge, with failure to notify the Court of Bluck's actions, causing a loss of 43 days of Court ordered parenting time with Petitioner and his Son consequently preventing Petitioner from defending these actions in court that also prejudiced Petitioner; and when Bishop threatened Petitioner to withdraw as Petitioner's attorney unless Petitioner paid in excess of \$35,000 in legal fees, is this "extrinsic fraud"? And does the Rooker-Feldman Doctrine bar the District Court's review of these actions under the Rules of Civil Procedure Rules 9(b) and 60(b)?

13) Did Defendants the Law Offices of Jeremy Martin and Attorney Jeremy Martin, (Martin) Petitioner's ex wife's Attorney, commit "extrinsic fraud" when they changed the California Court's orders making them more favorable to his client, and were able to get Bluck to sign them without Petitioner's knowledge preventing Petitioner from defending them in Court? And if so, does the Rooker-Feldman Doctrine bar the District Court's review of these actions under the Rules of Civil Procedure Rules 9(b) and 60(b)?

QUESTIONS PRESENTED – Continued

14) Did the Rooker-Feldman Doctrine bar the District Court's review of Petitioner's Complaint to determine if Defendants the American Bar Association, the State Bar of Michigan, the State Bar of California and their Presidents are State actors and liable under 42 U.S.C. §1983 when they support, propose and are nonfeasance in their discipline toward their members for discrimination, fraud and other unjust actions in divorce proceedings?

15) Did the Rooker-Feldman Doctrine bar the District Court's review of Petitioner Complaint, under the Rules of Civil Procedure Rules 9(b) and 60(b), to determine whether Defendants the Law & Mediation Firm of Klueck & Hoppes, APC and Attorneys Garrison Klueck, Traci Hoppes and Jeffery Miller (Klueck) committed "extrinsic fraud" by signing legal documents without Petitioner's consent or knowledge that gave the State of California Petitioner's private information used by the State of California to receive Federal incentives which later allowed the State of California to suspend Petitioner's Real Estate Brokers License and remove Petitioner's Families funds from their bank accounts without a hearing for Petitioner to defend against these actions?

PARTIES

Michael Hucul as a Father and as a Parent with joint custody of his child and those similarly like Him,

Petitioner(s),

v.

United States Department of Health and Human Services and it's Secretary, Sylvia Mathews Burwell; the State of Michigan and it's Governor, Richard Dale Snyder; the State of California and it's Governor, Edmund G. Brown Jr.; Representative Mike Bishop; Senator Gary Peters; Senator Debbie Stabenow; Senator Diane Feinstein; Senator Barbara Boxer; Representative Darrell Issa; the American Bar Association and it's President, Paulette Brown; the County of Ingham, Michigan; the County of San Diego, California; the State Bar of Michigan and it's President, Lori A. Buitewag; the State Bar of California and it's President, David Pasternak; the Honorable R. George Economy; the Honorable Michael D. Washington; Kronzek & Cronkright, P.L.L.C. and Attorney Charles M. Kronzek; Gower and Bluck Law and Mediation and Attorney Samuel Bluck; the Law Offices of Jeremy Martin and Attorney Jeremy Martin; the Law Office of Steven M. Bishop and Attorney Steven M. Bishop; the Law & Mediation Firm of Klueck & Hoppes, APC and Attorneys Garrison Klueck, Traci Hoppes and Jeffery Miller.

Respondents.

CORPORATE DISCLOSURE

The Petitioner is not a non-governmental corporation and the Petitioner does not have a corporation or shares held by a publicly traded company.

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OPINIONS BELOW

The memorandum of the United States court of appeals appears at page App. 1 of the petition and is unpublished. The order of the United States district court appears at page App. 4 of the petition and is unpublished.

JURISDICTION

The Jurisdiction of this Supreme Court of the United States is invoked under 28 U.S.C. §1254(1), because the judgment of the United States Court of Appeals for the Ninth Circuit was entered on November 20, 2017, without a petition for a rehearing.

STATUTORY AND REGULATORY PROVISIONS INVOLVED

42 U.S.C. §§ 651-670, 1983, 1985(3), 1986, 1988(a)(b)(c);

28 U.S.C. §§ 453, 455(a)(b)(4), 1331, 1343(a)(1)(2)(3)(4), 1346, 1443(1), 1453(b), 1446(a), 2201;

Title VI of the Civil Rights Act of 1964, 18 U.S.C. §§ 241, 242, 495, 1346;

45 C.F.R. §§ 301.12, 301.13, 302.34, 303.107;

Rules 9(b), 60(b), & 65(a) of the Rules of Civil Procedure;

The First Amendment's Rights to Liberty, Association, and Privacy; the Due Process Clause of Fifth and Fourteenth Amendments,

Section 4050 of the State of California's Family Code;

The State of Michigan's Child Support Formula Manual;



INTRODUCTION

Petitioner's Complaint was brought to the Federal Court not to impeach the State court's judgements but to present the Complaint as evidence of fraud and discrimination that is collateral, and where Defendants were not parties to the state-court judgments.

In addition to the Petitioner enduring the actions of questions 1-15, there were also 12 years of intermittent hearings in the Family Courts of the State of Michigan and the State of California where Petitioner was treated with indifference as a Father and a Parent, spent \$150,000+ in legal fees and used 9 different attorneys in an attempt for Petitioner to maintain a strong healthy relationship with his son. A right of association guaranteed by our Constitution, where the child support laws and customs of the States of Michigan and California and their tribunals clearly violated.

This Court, in *Troxel v. Granville* 530 U.S. 57 (2000) issued cautions regarding lengthy Court proceedings and the costs of attorneys in Family Court. These unattended warnings, and the constitutional rights violated by the State of Michigan and the State of California put this Petitioner and his Son under extreme and unwarranted amount of stress, harassment, indifference and discrimination, where Petitioner had no choice but to file his Complaint in Federal Court for the redress of his rights. (*Monroe v Pape* 365 U.S. 167 (1961))

12 years of hearings are State Defendant's intrusion violating the Parent's basic rights to raise their children as the Parents see fit. The Fourteenth amendment protect these rights by the State's unwarranted usurpation, disregard, or disrespect. And alleging that such proceedings may be in the child's best interest is insufficient. *Smith v Offer*; *Stanley v Illinois*; *Santosky v Kramer*. (*M.L.B. v. S.L.J.*, 519 U.S. 102, 116 (1996))

The following Statements of the Case will be a concise representation of the questions presented.

STATEMENTS OF THE CASE

Question 1) This Supreme Court ruled that outside a Parent's behaviors that pose a continued danger to the child, the State's cannot impose their *parens patriae* power over Parental control and the parents rights are autonomous and protected. (*Troxel v Granville* 530 U.S. 57 (2000))

This Court also ruled that the Secretary of Health and Human Services construction of child support is supported by the text of the statute, that Congress used child support throughout Title IV of the Social Security Act and its amendments “as a term of art referring exclusively to payments by absent parents”. (Sullivan v. Stroop 496 U.S. 478 (1990))

The State of Michigan’s child support laws, approved by Defendants Governor Richard Dale Snyder and the Secretary of Health and Human Services, Sylvia Mathews Burwell, are based on how much parenting time a parent has with their child. If a Parent has less parenting time, they pay more in child support. (2017 Michigan Child Support Manual)

The State of Michigan and the County of Ingham received a petition for divorce on September 15, 2004. On September 20, 2004 Ingham County sent a letter, via U.S. first class mail, to Petitioner directing Petitioner to meet with an Ingham County Conciliator on September 29, 2004.

Despite Petitioner not being an “absent” Parent, who provided his child a home, medical insurance, food and clothes; on September 30, 2004 the Conciliator recommended to the Ingham County Court that Petitioner be ordered to see his child only on alternate weekends and pay child support beginning September 16, 2004.

On September 30, 2004 this recommendation was signed into an order of the Court, without a hearing and without Petitioner having the opportunity to defend these actions.

Petitioner hired several attorneys, spent in excess of \$60,000 in legal fees and endured 3 years of protracted court proceedings before the divorce became final. Though Petitioner remained present in his child's life, provided a home, medical insurance, food, clothes, and had joint legal custody, Petitioner was ordered to continue paying child support with limited and unequal parenting time, where Petitioner's ex wife was not ordered to pay any child support.

In August 2012 Petitioner's ex wife moved to California and was granted permission to have their child move with her. On November 28, 2012, Defendants Kronzek somehow had the Ingham County Court sign an order without a hearing, violating Petitioner's substantive due process and due process rights subjecting Plaintiff's Son to unwanted and unwarranted counseling. Entries No. 270-273 of the Register of Actions confirm there was no hearing.

To maintain his relationship with his son, in March 2013 Petitioner also moved to California. During a November 8, 2013 County of San Diego Family Court hearing, the Court granted Petitioner joint legal and joint physical custody of his son, was ordered to pay child support and his ex wife was not, and the Court gave Petitioner the choice to move within 15 miles of where his son went to school to have an equal

shared, week on week off parenting times; on November 12, 2013 Petitioner moved within 15 miles of where his son went to school, notified his attorney, Defendants Bluck to facilitate the beginning of the week on week off parenting time schedule, but Bluck failed to acknowledge Petitioner's understanding of the Court's order and diminished Petitioner's requests for his assistance. (Appendix C, App. 23)

Petitioner on November 25, 2013 retained Defendants Bishop as his new attorney who then made Petitioner aware that Bluck signed an order drawn up by Defendants Martin, without Petitioner's consent or knowledge. This order drawn by Martin eliminated Petitioner's shared parenting times. But the Parenting times were not eliminated by the Court, as this is confirmed in the hearing transcripts for the November 8, 2013 hearing. Instead of remedying this conflict, Bishop used it to increase his legal fees and subjected Petitioner to protracted court hearings where Bishop charged Petitioner in excess of \$8,000 in legal fees for just the month of February 2014.

From 2013 to 2017 Petitioner was treated with indifference during harsh conditions during Court proceedings, paid an additional \$75,000 in legal fees and \$3,000 for a forensic analysis of his income. His new attorneys, Defendants Klueck, misrepresented him, agreed to a vocational evaluation for the purposes of determining child support payments that violated Petitioner's privacy rights and liberty rights to choose

ones own vocation, signed documents without consulting with him, and with the mounting stress and anxiety Petitioner needing medical attention. (Appendix D, App. 26-27)

Petitioner's ex wife was not subjected to these conditions, for paying a forensic analysis, or to undergo a vocational evaluation. There is no California law cited that grants jurisdiction to the ordering of child support or to the ordering of a vocational evaluation, preventing Petitioner from challenging the constitutionality of the law. Consequently, Petitioner must challenge their "customs" instead.

Because of the stigma, discrimination and harassment Petitioner experienced while having his constitutional rights to association, liberty rights to choose ones own vocation, due process and substantive due process rights violated, Petitioner filed his Complaint on May 25, 2016 in the District Court for the redress of his rights. Since that time and without notice of a hearing, Petitioner received letters from the State of California Department of Child Support Services, (DCSS) indicating Petitioner was now a "non-custodial" "absent" Parent. (Appendix F)

Though the State of California passed laws indicating their child support laws are in compliance with Federal law, they also and without hearings for due process and without being in compliance with their own Sections 17212(a)(2) and 17404(f)(3), for the State of California's DCSS to obtain an order from the Court to start collections and enforcement of child support

orders that are for “absent” parents; the DCSS froze Petitioner’s wife and 14 year old son’s bank accounts, took over \$2700 and suspended Petitioner’s Real Estate Brokers license, without Petitioner having the opportunity to defend against these actions. (Appendix F, App. 36-40)

The Supreme Court of California and the California Appellate Court ruled: “Fathers” are to pay child support. “It has long been the law in this state that a minor’s right to support and maintenance by its father may not be limited or contracted away by the parents”. (In re Marriage of Crosby & Grooms, 10 Cal. Rptr. 3d 146-Cal: Court of Appeal, 1st Appellate Dist., 2nd Div. (2004)) The Supreme Court of California indicated the “obligor” is usually “the father”. (In Re Marriage of Comer, 14 Cal. 4th 504 (1996))

This Supreme Court of the United States recently ruled “Correspondingly, such laws may disserve men who exercise responsibility for raising their children. See *ibid* In light of the equal protection jurisprudence this Court has developed since 1971, see *Virginia* 518 U.S., at 531-534, §1409(a) and (c)’s discrete duration-of-residence requirements for unwed mothers and fathers who have accepted parental responsibility is stunningly anachronistic”. And, “For close to a half century, this Court has viewed with suspicion laws that rely on “overbroad generalizations about the different talents, capacities, or preferences of males and females”.

And “Prescribing one rule for mothers, another for fathers, is of the same genre as the classifications declared unconstitutional”. (Sessions v. Morales-Santana, Supreme Court (2017))

In addition, Congress enacted 42 U.S.C. §654(7) that provides Defendants’ the Honorable R. George Economy and the Honorable Michael D. Washington with financial agreements that pay a portion of their salaries with Federal funds based on “cooperative arrangements” for achieving “optimum results” when they make child support orders during Court proceedings where Petitioner and those similarly like him are parties to. 28 U.S.C. §455(a)(b)(4) requires any justice to disqualify himself in any proceeding where his impartiality might be reasonably questioned. Including any pecuniary interest in the subject matter of a proceeding he, his spouse, or any of his minor children residing in his household might have.

Questions 2-15) This Supreme Court ruled the Rooker-Feldman Doctrine does not reach as far as the lower Courts have applied it, the lower courts have erroneously “conflated” it with preclusion law, and it “does not bar actions by nonparties to the earlier state-court judgement simply because, for the purposes of preclusion law, they could be considered in privity with a party to the judgment”. (Lance v. Dennis, 546 U.S. 459 (2006))

The Third Circuit, in citing the Sixth and Fourth Circuits, stated the source of the injuries caused by the defendant’s actions and not the state-court judgments, Rooker-Feldman is not a bar to jurisdiction. And as the

situation presents itself here, it was the separate constitutional violations from unconstitutional Federal and State laws and their applications by the Counties of San Diego and Ingham that injured Petitioner. (Great Western Mining v. Rothschild, 615 F.3d 159 (2010)) See also, (Evans v. Cordray, 424 Fed.App'x 537 (6th Cir. 2011)) These Circuit Court decisions are in direct conflict with the Ninth Circuit's ruling here, because Petitioner is not seeking to challenge the adverse state-court judgments, but a review of the Federal, State laws, and customs as applied, and as such the Rooker-Feldman Doctrine does not bar the District Court's review. (Skinner v. Switzer 562 U.S. 521, (2011))



REASONS FOR GRANTING THE PETITION

Because child rearing is a “central part” of liberty protected by due process clause, (Meyer v Nebraska, 262 U.S. 390, 399-400 (1923)) when the Parents are going through a divorce, the core family is disrupted, with little to no knowledge of the judicial system they become vulnerable and dependent on the Parens Patriae of their State and local Government.

“Various factual situations can always arise which will appeal to our emotions. These emotional considerations, however, present inherent dangers and should never trump the very fundamental rights of association, privacy, and liberty between fit parent and child. Well-intentioned, yet highly subjective concerns will

lead to a slippery slope of other, seemingly innocuous interventions of the parent-child relationship. The result is confusion and uncertainty, which ultimately works to the detriment of the child". (Troxel v. Granville)

Statistics from the State of Texas indicated 80% of minors sent to prison came from homes with no Fathers. In 2004 the Bureau of Justice Statistics indicated 56% of "jail inmates" grew up in single family homes. Having both parents actively involved in their children's lives should be of National concern.

To protect "parental autonomy", this Supreme Court has developed a threshold test for the "imposition of the state's *parens patriae* interests [citing, *inter alia*, Meyer, Pierce, and Stanley]. Generally, the state cannot interfere with the parents' right to raise a child in a particular manner unless the parents' practice endangers the child." Where a parent has not been found unfit, the state "cannot presume that the parent and child are adversaries," or that their interests diverge. Santosky, *supra*, 455 U.S. at 760, 767, n. 17. "The 'best interests of the child' test is triggered after the finding of the failure of the parent-child relationship." Thus, absent either the continuing danger posed by an unfit parent, or some extraordinary danger arising from the practices of otherwise fit parents (e.g., refusal to allow vital medical treatment), the state's *parens patriae* role does not override parental control. (Troxel v. Granville)

The fundamental and compelling State interest is to ensure that children are in fit environments, including freedom from abuse and neglect, and receiving adequate food, shelter, clothing, and access to education. The welfare of children would be dramatically improved if the state were to satisfy this duty. (*Troxel v. Granville*)

This Court's own Rule 10 sets out the considerations governing review on certiorari. The rule instructs that among "the reasons the Court considers" in deciding whether to grant or deny certiorari are whether a lower court of last resort (a federal court of appeals or a state court of last resort) (1) "has entered a decision in conflict with" another such court on "an important federal question"; (2) "has so far departed from the accepted and usual course of judicial proceedings, or sanctioned such a departure by a lower court, as to call for an exercise of this Court's supervisory power"; (3) "has decided an important question of federal law that has not been, but should be, settled by this Court"; or (4) "has decided an important federal question in a way that conflicts with relevant decisions of this Court". (*Tolan v. Cotton* 134 S.Ct. 1861 (2014))

What we have is a conflict with the Circuit Courts regarding the breadth of the Rooker Feldman Doctrine that begs for this Supreme Court's guidance.

Coercing Parents with joint custody to pay child support by freezing their bank accounts and suspending their licenses, while state-court judges have a pecuniary interest has become so far departed from the

accepted course of judicial proceedings, the United States Department of Justice released a memo in March 16, 2016 and January 2017 addressing these very issues as being unconstitutional, and it should be settled by this Supreme Court the national importance of keeping both parents active in their children's lives, even during times of a divorce. (Appendix G)

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CONCLUSION

The Petition for writ of certiorari should be granted.

Respectfully submitted,

Originally signed on: February 17, 2018

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