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Supreme Court, U.S.
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IN THE UNITED STATES SUPREME COURT

Cause No. 17-6553

Ron Glick,

Plaintiff/Appellant/Petitioner,

v.

Angela J Townsend, Andrew Wies, The Forlorned LLC,
Good Outlaw Studios, Clean Teen Publishing, Inc., and
Does One through Twenty,

Defendant/Appellee/Respondent.

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SUPREME COURT, U.S.

AMENDED PETITION FOR REHEARING

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IN THE UNITED STATES SUPREME COURT

Cause No. 17-6553

Ron Glick, Petitioner

v.

Angela J Townsend, Et Al.

On Writ of Certiorari
To the United States Supreme Court

PETITION FOR REHEARING

Pursuant to Rule 44 of this Court, Petitioner hereby respectfully petitions for rehearing of this case before a full nine-Member Court. All other issues of law notwithstanding, the Court's denial of Petitioner's writ of certiorari grants impermissible authority to the federal courts to commit fraud on the court, and this Court is empowered to designate a lower judicial panel to review by precedent.

1. This case acts as a gateway through which fraud on the court by the federal courts themselves becomes permissive and acceptable conduct of the lower courts. Whereas the Court's denial of certiorari review by standard provides for the Court's impartial

position regarding interpretation of law by the lower courts, it is not designed to be permissive in granting leave for the lower courts to act criminally.

2. This cause does not require a full review – simply a procedural remand back to the lower courts. Though typically a rehearing request calls upon the Court to reconsider the cause for the certiorari review process, it is allowable for the Chief Justice to designate a judicial panel of lower court judges for review.

ARGUMENT

Petitioner is aware that it is exceedingly rare that the Court grants rehearing. Petitioner is equally aware that the Court's choosing to summarily deny a petition for writ of certiorari does not itself suggest approval by the Court of the lower court's action, but instead “imports no expression of opinion upon the merit of the case[.]” (Missouri v Jenkins, 515 US 70 (1995)), and that the lower court's decision on law is treated as the mandatory authority.

However, this procedural understanding rests upon a lower court acting within its jurisdiction to interpret *law*; it does not encapsulate felonious nor fraudulent conduct of a lower court, as the presumption is that the lower courts adhere by principle to regulatory practices of a court of law. In the instant case, the most paramount issue before the court is not a measure of *law*, as it is *procedure and conduct of the federal*

judiciary of Montana as a whole.

In a nutshell, the United States District Court Magistrate Judge Jeremiah Lynch stepped well beyond his jurisdictional authority to commit fraud on the court by *deliberately* and *vexatiously* changing the details of the case to support a denial of innate equal protection of the law afforded to Petitioner under the Fourteenth Amendment to the United States Constitution, and this act was covered-up by United States District Judge Dana Christensen, while the Ninth Circuit simply ignored the issue entirely.

Lynch took Petitioner's pleadings (See Petitioner's Complaint Pages 4-5, ¶¶ 10-18, attached hereafter as Exhibit A) and substituted his own altered version (See Order, and Findings and Recommendations Page 7, ¶2, attached hereafter as Exhibit B) in his summary to *create* a reason to dismiss Petitioner's claim. Specifically, Lynch created the detail that the cover art containing the name "The Forlorned" was within the corrupted PDF file restored by Petitioner, when in fact, Petitioner specifically stated, "With a new name and original content restored, Defendant Townsend *purchased* cover art for her new book on or about August 6, 2013" (Petitioner's Complaint, Page 5, ¶ 17). These are plainly *not* the details summarized by Lynch, which represents a deliberate misrepresentation of the record, ie, fraud.

Though no binding precedent is set upon the lower court's interpretation of law, the Court's denial of certiorari review does however provide a perception that fraud is

acceptable when a lower court feels a prejudice or bigotry towards a specific pleadant. In effect, though a precedent is not set, an *allowance* for criminal malfeasance is still granted by denial under such circumstances.

To falsify information by a judge is indisputably fraud. "...[I]f it looks like a duck, walks like a duck and quacks like a duck, it must be a duck... even if it is holding a piece of paper that says it is a chicken" (*Wild v. Fregein Construction*, 68 P.3rd 855 (2003)).

These actions defy the prohibitions against fraud in FRCP Rule 60(b)(3) and prohibitions against impropriety in the Code of Conduct for United States Judges (A judge must avoid all impropriety and the appearance of impropriety – Canon 2A). To permissively grant leave to a lower court to commit fraud flies in the face of the United States Constitution.

"[T]ampering with the administration of justice as indisputably shown here involves far more than injury to a single litigant. It is a wrong against the institutions set up to protect and safeguard the public, institutions in which fraud cannot complacently be tolerated consistent with the good order of society" (*Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 US 238 (1944)). "There is no question of the general doctrine that fraud vitiates the most solemn contracts, documents, and even judgments" (*United States v. Throckmorton*, 98 US 61 (1878)).

By this principle, this matter should never have reached this Court's attention. A side-by-side comparison indisputably proves that Judge Lynch's summary is in direct incongruity to Petitioner's pleadings, and that the facts presented by Lynch are *so* diverse from Petitioner's pleadings that it is inconceivable that they could ever have been derived from a review of Petitioner's complaint.

There is simply no way that Petitioner could say "apple", and Lynch could say Petitioner said "orange", and have Lynch's word be taken as *not* false.

Even Respondents in this case left this issue (as with all other issues) uncontested. Generally, common law compels that when a pleadant fails to contest an issue, that the fact at issue is well-taken, which is to say, there is no dispute. Even though Respondent Townsend's counsel acted duplicitously himself by filing for appearance without providing mandatory notice to Petitioner (Petitioner had to learn about this fact through a review of the docket sometime after said counsel filed for appearance), nevertheless, said Petitioner was poised *to* respond and contest this issue, yet did not do so. Consequently, it is plain that the fact of Lynch's fraud on the court is *not* a disputed issue between the parties.

The misrepresented facts by Lynch are therefore indisputably fraud on the court, and should have negated this issue long before a petition for writ of certiorari became necessary. As such, the *moment* Petitioner objected to the flagrant fraud, it should have

immediately and *automatically* disqualified Lynch and overturned his rulings. And yet, Petitioner is here nevertheless making a final plea for justice.

Likewise, a simple acknowledgment of fraud in the lower court proceedings would have foregone the long, arduous nature of a petition for writ of certiorari in the first place. And Petitioner respectfully requests that this Court correct this simple wrong by remanding this cause to an impartial court.

Additionally, this Court set a procedure in effect to review claims brought against lower courts. When suit is brought against a federal court, circumstances require the cause to be reviewed by a panel of outside judges, serving at the designation of the Chief Justice of the United States Supreme Court (*Matter of Skupniewitz*, 73 F3d 702 (7th Cir, 1996)). In effect, all that is needed in the instant case: for Chief Justice Roberts to designate a three judge panel to review the claim of fraud.

Incidentally, in addition to pleading for specific change of venue, Petitioner also pleaded for this *precise* remedy to the district court, but said court refused to relinquish jurisdiction. Petitioner sought to have Chief Justice Roberts to designate a three-justice panel to review the conduct of the lower court from the outset of the cause, yet the district court refused to cede authority outside its own corrupt influence.

As the procedure is already in place, Petitioner would respectfully request of the Court to simply remand the cause to a three justice panel designated by Chief Justice

Roberts to permit an impartial review of the cause.

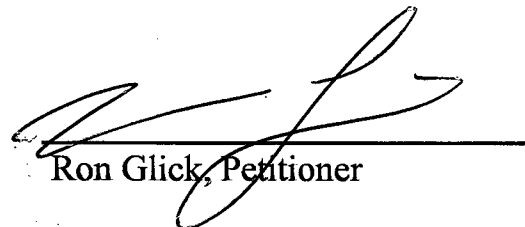
CONCLUSION

It is indisputable that Judge Lynch's summary upon which he drew his conclusion was fraudulent, as it did not reflect any pleading made by Plaintiff, and it was used to expressly bar Petitioner from equal protection under the law. As this is a case of indisputably fraudulent misconduct by lower court officials, a denial of review effects a permissive allowance of fraud by this Court rather than a simple impartial position on the interpretation of law. As such, this Court should not remain silent, and at the very least remand this cause to an impartial lower court for proper administration.

For the foregoing reasons, the petition for rehearing or petition for rehearing should be granted.

Dated: February 19, 2018

Respectfully Submitted,



Ron Glick, Petitioner