

AUG 23 2017

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No. 17-XXXX

Appeal of 394 P.3d 1007
(2017)

IN THE

SUPREME COURT OF THE UNITED STATES

Mr. Joel C. Ittner — PETITIONER
PRO (Your Name) JE

vs.

Don Kennedy Prop, LLC RESPONDENT(S)
Global Don Kennedy Deal Esq
ON PETITION FOR A WRIT OF CERTIORARI TO

The Washington State Court of Appeals
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Mr. Joel C. Ittner, Jr.
(Your Name)

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(City, State, Zip Code)

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LIST OF PARTIES

☒ All parties appear in the caption of the case on the cover page.

☐ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

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~~City of Richland v. Wakefield~~ **D-1, P.101**

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IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

☐ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

☒ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix A to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

The opinion of the Washington State Supreme Court court appears at Appendix B to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

☒ rec'd at 3/14/32 1997 (2017)
not published
denial of disc.
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2A

JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

☐ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ____ A ____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☒ For cases from **state courts**:

The date on which the highest state court decided my case was _____
A copy of that decision appears at Appendix _____.

May 31, 2017
NC 19-124-6

☐ A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ____ A ____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

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Seattle "Just Cause"

Eviction Ordinance

WA PDC Policy

No. 596154 I.A. 1-4.

(Legal Services)

QUESTIONS PRESENTED FOR REVIEW:

- I. Did the Washington Court of Appeals, Division One, violate Petitioner's right of access to the Courts, and U.S. Supreme Court Rules 14-1 (e), (a)(i)-(iii), by forcibly depriving this Petitioner, of Access into the One Union Square Building, 600 University Street, Seattle, WA, 98101, in order to photocopy documents related to this Case, on Monday morning, July 10, 2017?

- II. Did the Municipality of the City of Seattle, establish a "right" to continuous occupancy of rental housing, by enacting the Seattle "Just Cause" Eviction Ordinance, Seattle Municipal Code SMC 22.206.160 (c)(3), and thence, by depriving Petitioner of the right to "personally appear" at the "Show Cause" hearing scheduled in his Case, on Thursday, December 27, 2012, and by WA DOC Procedures & Policies (WA DOC ~~3~~, unlawfully depriving Petitioner of the right to "complete the record" (WA Rules on Appeal, 9.2), in the Landlord-Tenant case at bar?

- III. Does the Washington case MHM & F, LLC v. Pryor, 168 Wn.App. 451, 460, 277 P.3d 62, 65-66 (2012), dealing with the "sufficiency" of an eviction summons, under RCW 59.18.365 (1)-(3), violate Petitioner's rights under Amendment XIV, USCA, to equal protection and to due process of law, and under Amendment VII, USCA, to a jury trial in all civil cases?

- IV. Should the Washington State trial & appellate Courts below, be allowed to collect Court “Costs” and “Attorney’s fees,” etc., from an “Indigent” party, such as this Petitioner?
- V. Are the provisions written in RCW 59.18.130 (1)-(2), dealing with the so-called “disposition” of labelled “rubbish,” “garbage,” etc., unconstitutionally vague & overbroad?
 - 1. Vagueness? 2. Overbreadth?

SUMMARY OF FACTS

Petitioner was suddenly told, on Thursday, Nov. 15, 2012, that “Carbon Monoxide [CO¹] Detectors” were going to be installed, in his apartment unit, located at 4120 Brooklyn Avenue, Northeast, Unit No. #405, Seattle, WA, 98105, allegedly pursuant to the terms written in the Washington State building code for apartment buildings, RCW 19.27.530 (1)-(5). The installation apparently took place the next day, Friday, Nov. 16, 2012, while Petitioner was absent from the building. Apparently, the Don Kennedy Real Estate Management team, consisting of Don Kennedy Property Manager James Paar and Coho Apts. Resident Manager Julie Hamilton, became dissatisfied with the condition of Petitioner’s apartment unit, No. #405, which the Pet. had occupied, since at least March 26, 1993. (He had first moved into the Coho Apts., as a tenant, on Wednesday, September 6, 1978, almost thirty years previously.) Counsel for the Respondent Landlord DK Properties, presented Petitioner, with a “10 Day Notice to Comply [sic] Or Vacate,” allegedly pursuant

to RCW 59.18.130, Duties of tenant. Respondent NEVER returned to “inspect” Petitioner’s apartment unit at any time before he “expiration” of the cited “10-day” period, at 5:00 PM, Friday, Nov. 30, 2012. Pet. Was subsequently, “arrested,” at about 1:30 PM, on Wednesday, December 5, 2012, by the State of Washington, on unrelated “criminal” charges. See King County No. 12-1-06088-2 SEA, noted at 183 Wash.App. 1037 (2014), review denied, 182 Wn.2d 1021 (2015). Petitioner has NEVER been allowed to return to his former apartment unit, at ANY time subsequent, to Wednesday, December 5, 2012. A “Show Cause” hearing, was scheduled by Respondent Don Kennedy, for Thursday, December 20, 2012. Petitioner requested to be “transported” to an adjacent Courthouse, in order to attend the “Show Cause” hearing. This Motion by Defendant, was denied by the King County Superior Court, Chief Criminal Motions Judge Ronald M. Kessler. Subsequently, Petitioner was NOT allowed to attend the “Show Cause” hearing, now re-scheduled for Thursday, Dec. 27, 2012, and Petitioner was “evicted” from his Coho Apts. Address, by King County Superior Court Commissioner Carlos Y. Velategui. See King County Number 12-2-39304-4 SEA, Dec. 27, 2012, Velategui, J. Subsequently, Petitioner was unable to “perfect” his Appeal, of this “judgment & Writ of Restitution,” because the King County Superior Court Clerk, would NOT release the necessary “Docket Information,” such as King County Superior Court Clerk’s Office (see e.g.barbara.miner@courts.wa.gov) Document “Sub-Numbers,” etc., to Defendant while he was appealing, from inside the King County Jail, as well as from WA DOC, where he was transported, on May 17,

2013. Petitioner, was forcibly stopped, from obtaining the necessary Court documents, besides the Final Judgment & Writ of Restitution, necessary in order to perfect his Landlord-Tenant appeal while in WA DOC “custody.” Cf. Washington State Court of Appeals No. 69815-0-I, slip opinion at 1-4, January 17, 2017 (Applewick, J.) Petitioner was denied any publicly-appointed counsel or waiver of filing fees in the Landlord-Tenant case at bar. WA Rules on Appeal, 15.1-15.3. His Petition for Discretionary Review, was denied by the Washington State Supreme Court, on May, 31, 2017. See 394 P.3d 1007 (2017). This Petition for A Writ of Certiorari, “The Judgement-Part III,” now timely follows.

RULINGS OF COURTS BELOW.

The Judgment of the Washington Court of Appeals, was noted (NOT “published), at No. 69815-0-I, 18X_ Wash. App., on January 17, 2017. The Ruling Terminating Review, was entered by the Washington State Supreme Court, on May 31, 2017, noted at 394 P.3d 1007 (Wash. (May 31, 2017)).

STATEMENT OF CASE

Petitioner was subjected to an “unlawful” search of his private apartment unit (Coho Apts., #405), allegedly pursuant to Don Kennedy enforcement of a general WA State “building code” (monoxide “detectors”), which ultimately led to warrantless “search” of his apartment unit, supposedly in order to uncover “defective” conditions allegedly “caused” by the Tenant (Petitioner), which

ultimately led to Petitioner's (Mr. Holmes') "eviction" from ALL privately-owned residential "housing" here in the City of Seattle. Respondent (DK Properties, LLC) NEVER once returned to "inspect" the unit, prior to the expiry of the cited "10-Day" period for compliance in question. Pet. Was forcibly prevented, by WA State & King County, WA, jail and prison "rules," from: attending his Dec. 27, 2012 "Show Cause" hearing (the ONLY hearing ever scheduled at the trial court level, in the case at bar), obtaining the necessary King County Superior Court documents (and each required "sub-number," as filed by the King County Superior Court Clerk), or from attending the appellate panel hearing, in the case at bar (only a "closed" hearing, was convened by the three Washington State appellate "Justices" Applewick, Mann, and Becker, on Jan. 17, 2017, in the instant case). Petitioner was subsequently forced to pay "Attorney's Fees" (slip op., at 6-7) by the Washington State Court of appeals, Division I, as well as by the trial court below, despite his confirmed status as an "indigent" by Washington Courts. Petitioner, was subsequently stopped by the Court of Appeals, Division One, and by THEIR "Landlord," Mr. Craig A. Wrench, CEO of One Union Square Building/Washington Real Estate Holdings, LLC, from compiling the necessary Court documents, on July 10/11, 2017, necessary in order to complete THIS Petition. See e.g., Richard.johnson@courts.wa.gov, cwrench@waholdings.com, etc. Is it any wonder that Petitioner, now hereby requests, from the Supreme Court of The United States, to abrogate (end) his United States citizenship?

REASONS WHY THIS PETITION, SHOULD BE **GRANTED**:

ARGUMENT:

I. Washington Real Estate Holdings, LLC, and the Washington State Court of Appeals, Division One, 600 University Street, Seattle, Washington, 98101, (206)-464-7750, (206)-613-5300, resp., substantially interfered with Petitioner's rights of access to the Courts, by forcibly stopping him from entering the building, at 8:05 AM, PDT, Monday morning, July 10, 2017, in order to reproduce Documents related to the filing of THIS Petition.

See e.g. *Bounds v. Smith*, 430 U.S. 817, 830, 97 S.Ct. 1491, 52 L.Ed.2d 72 (1977) (Marshall, J.) In the case at bar, Petitioner, who had entered the Court Clerk's Office and the surrounding One/Two Union Square/Rainier Square complex ("privately" owned, due to a "government-business" partnership between WA State and WA Real Estate Holdings, entered into when the Office Tower [I Union Sq.] was completed in March 1981, cf. Ayn Rand, "The Fascist New Frontier," recorded lecture, January 1963 [critique of American "government/business "partnerships" as analogous to 1930's European "fascism"]], previously since 1989 approximately, WITHOUT INCIDENT, was suddenly "barred" from entering the building, on Monday morning, July 10, 2017. Subsequent attempts to re-instate entry for Pet., into this "privately-owned" Office complex, in order to

complete the Documents necessary, in order to prepare a Petition for A Writ of Certiorari, to the Court of Appeals, have been unavailing. Cf. Ward v. Rock Against Racism, 491 U.S. 781, 782, 109 S.Ct. 2746, 105 L.Ed.2d 661 (1989) (Kennedy, J.) (“viewpoint-neutral” restrictions on First Amendment “rights”).

- II. The City of Seattle, has established “continuous occupancy” of privately-owned rental housing, as a “right,” under Seattle Municipal Code [SMC] Section 22.206.160 (c)(3), which was clearly abrogated by the King County Correctional Facility (KCCF) and by WA DOC (Policies & Procedures ~~594.008 1.A~~), NOT allowing Petitioner, perfect his appeal of this Landlord-Tenant matter, while “in custody” for King County (unrelated) No. 12-1-0608-2 SEA (May 13, 2013, Bowden, J. Pro Tem). See e.g. Faciszewski v. Brown, 192 Wn.App. 441, 367 P.3d 1085, 1090 (2015), **reversed on state-level discretionary review**, 187 Wn.2d 308, 386 P.3d 711, 718-720 (2016).

While the provision of rental housing, might not objectively be considered a Constitutional or legal “right” (see e.g., Ayn Rand, “Man’s Rights,” Volume No. 2 Objectivist Newsletter, Issue No. 5 (May, 1963) (denying concept of “economic rights” [to specific goods & services]), reprinted in Capitalism: The Unknown Ideal (1967 paperback ed.)), the City of Seattle has enumerated it as such, by limiting the ability of private Landlords, as occurred here in the case at bar, legally to

“evict” Tenants. See e.g. City of Richland v. Wakefield, 186 Wn.2d 596, 380 P.3d 459, 464-466 (2016) (Stephens, J.) (limitations on collection of “court costs” from indigent **criminal** defendants). Clearly, the State of Washington, interfered with that enumerated “right” to rental housing (which Pet. had lived in since Wed. Sept. 6, 1978), by using King County Correctional Facility [KCCF] & WA DOC Policies & Procedures, in order to STOP this Petitioner, from obtaining and filing the Court-required “sub-numbers” and Documents, necessary for Petitioner to complete his State-level Appeals, in this Landlord-Tenant case. Petitioner now hereby demands that this Court, provide him with housing comparable, to his former apartment unit.

- III. The main case cited by the Court of Appeals below, in order to justify Petitioner’s “eviction,” on Dec. 27, 2012, MHM & F, LLC v. Pryor, 168 Wash.App. 451, 460, 277 P.3d 62, 65-66 (2012), denying the need for sufficiency in an eviction notice, deprives Pet., of his rights under Amendments XIV and VII, USCA.

In the case at bar, Petitioner was told by the Landlord, DK Properties, LLC, that his “personal attendance” (Landlord’s [Plaintiff’s] Motion To Show Cause [sic] Or Vacate, Dec. 10, 2012), was supposedly required at the scheduled “Show Cause” hearing, in King County Superior Court. Yet his personal attendance, was denied by the Chief Criminal

Judge in King County, WA, Superior Court (Hon. Ronald M. Kessler, ronald.kessler@courts.wa.gov) in that Court. Later, the Court of Appeals ruled that the un-reviewed Pryor case, invalidated ANY requirement that an “eviction” summons be free of defects (unlike, say, a residential dwelling unit), in order for the trial (Superior) Court, to retain jurisdiction, here in WA State. See Court of Appeals No. 69815-0-I, Jan. 17, 2017, slip op. at 4-6 (Applewick, J.). This line of reasoning, clearly deprives Pet., of his rights to a “jury trial,” in an “eviction,” under Amendment VII, USCA, as well as his “rights” to due process and “equal protection of law,” under Amendment XIV. See e.g., United States Government Printing Office, “Seventh Amendment---Civil Trials---Contents,” PDF, <http://www.gpo.gov>. The Justices v. Murray, 76 U.S. (Wall) 274 (1869).

- IV. Washington State, has violated Petitioner’s rights, under Amendment XIV, USCA, by forcibly collecting “Attorney’s Fees,” from an “indigent” Defendant, at both the trial Court and Appellate Court (WA Court of Appeals, Division I) level, in the Landlord-Tenant case at bar.

Washington State, has recently “exempted” **criminal** appellants, from re-paying this State [but cf. RCW 10.73.160 (1)-(6)] for the costs of failed criminal appeals, initiated by defendants. See especially State v. Blazina, 182 Wn.2d 827, 344 P.3d 680, 683 (2015) (costs on appeal); see also e.g. City of Richland v. Wakefield, 186 Wn.2d 596, 380 P.3d

459 (2016) (trial court costs). Clearly, it makes NO sense, to exempt defendants in **criminal cases, from paying the State's labelled "Appellate costs" (RCW 10.73.160 (1)-(6))**, while jailing defendants in *civil* cases, such as Petitioner, for NOT "repaying" to a prevailing Plaintiff these exact same "costs" and "Attorney's fees." Cf. No. 69815-0-I, slip op. at 6-7. Bearden v. Georgia, supra, 461 U.S. 660 at 664-674 (1983) (court-assessed fines).

- V. The provisions contained in e.g., RCW 59.18.130 (1)-(2), dealing with disposal of "rubbish," "garbage," "waste," etc., and used by the trial Court below (King County Number 12-2-39304-4 SEA. Dec. 27, 2012, Carlos Y. Velategui, J.), are unconstitutionally vague & overbroad.

1. Vagueness. See e.g. Kolender v. Lawson, 461 U.S. 352, 359-361, 75 L.Ed.2d 903, 103 S.Ct. 1855 (1983) (Cal. Penal Law 647(e)).

No precise definitions, are contained in these cited statutes, to narrow such emotion-laden terms, as "rubbish," "garbage," etc. Seattle-based "environmentalists," in particular, have spent most of the last 40+ years, trying to convince everyone, that there is NO such thing, as "garbage," etc., and that EVERYTHING on Earth, produced once by Mankind, can hence, forever thereafter, be profitably "recycled." Modern Neo-Classical economics, also tells us that there is NO "scientific" way, to quantify, measure, or to equate, individual consumer utility functions $u(x_1, x_2, \dots, x_n, \dots)$, and, thus, indeed,

“One person’s trash MAY be another person’s treasure..” (a proposition which deeply offended the Court of Appeals below). But cf. e.g., such books as Tanguiane, Social choice & welfare (discussing Arrow’s paradox [Kenneth Joseph Arrow, {1921-2017}], saying that there are NO uniformly objective “social utility functions”!) These so-called Washington State “Residential Landlord-Tenant” Laws, enacted by “Liberal” Republican Gov. Daniel J. Evans [1925-], in 1973, are arbitrary & unenforceable. See especially such cases as e.g. Fountain Valley Homes v. Department of Veterans’ Affairs through Cunningham, 79 Cal.Rptr. 248, 249-252 (Cal.App. 4TH Dist., Div. 3 (1998)), 67 Cal.App. 4TH 743 (1998) (California state-level appellate Court rejecting private condominium association’s demands to legally “evict” elderly “hoarder” from residential home).

2. Overbreadth. NO discernable standards, are contained in RCW

59.18.130 (1)-(2), or elsewhere in Washington State law, which would in any way LIMIT the power of an ostensibly “Private” Landlord (acting as an **agent of the State under RCW 59.18**), to arbitrarily confiscate and to thence dispose of, any personal “property” retained by the Tenant, held to comprise “trash,” “garbage,” “rubbish,” etc., WITHOUT any financial compensation, provided by the State or by the Landlord. Cf. City of Oakland v. Oakland Raiders, 32 C3d 60 (Cal. Superior Court (1982)) (public “condemnation” proceeding to take sports franchise VIA “eminent domain”); “History of Seattle’s U[niversity] District-Attempts to build Pedestrian Mall on The Ave [University Way, Northeast], opposed by

local Landlord [Don Kennedy Real Estate-Respondent in this Case],”
<http://www.washhistory.org>. May these legal provisions, be used by a
 Landlord, to compel the disposal or sale to himself, of commercially
 valuable artworks, at bargain-basement prices? May a private Seattle-
 area Landlord, force a recalcitrant Rastafarian Tenant, forcibly to shave
 off all of his hair or his beard, in the name of so-called “Pest [or “head
 lice”!!] control,” under the aegis of the challenged provisions written into
 RCW 59.18.130 (1)-(2)? Compare loc. Cit., [Jacob, b. 1977] Holmes v.
Sup. [Sharon] Engelson, U.S. Dist. No. 16 Civil 5234 (Northern District
Illinois (IL) (August 9, 2017) (forced IL DOC state prison transfer
“haircut” of Rastafarian inmate upheld).

SUMMARY & CONCLUSIONS: RELIEF REQUESTED:

**For ALL of the above-enumerated reasons, THIS PETITION SHOULD
 BE GRANTED, AND THIS Petitioner allowed once again, to live at 4120
 Brooklyn Avenue, Northeast, Unit No. #405, Seattle, WA: “There’s a
 Landlord-Tenant dispute on Brooklyn [sic], which has broken out in
 fights....”!!!! Joel Christopher Holmes, PRO SE.**

CERTIFICATE OF SERVICE: I, Joel Christopher Holmes, the Petitioner PRO SE,
 in the above-enumerated Petition for A Writ of Certiorari, hereby do Certify &
 Declare; That I Served the Hon. Evan L. Loeffler, Christopher Daniel Cutting, et
 al., Attorneys-At-Law, Suite No. 1025, 400 Union St., Seattle, WA, 98101,
eloeffler@loefflerlaw.com, ccutting@loefflerlaw.com, VIA U.S. Mail or Third-Party
 Commercial Delivery, etc., with ONE copy of thie associated Petition for A writ

of Certiorari, and Motion To Proceed In Forma Pauperis (IFP), on THIS DAY the

23RD Day of August 2017. BY: JOEL CHRISTOPHER HOLMES, Pro Se, August

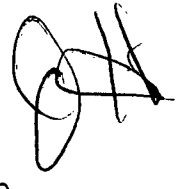
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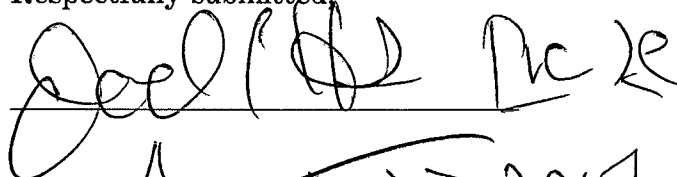
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CONCLUSION

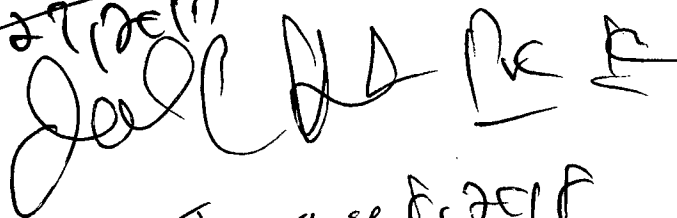
The petition for a writ of certiorari should be granted.

Respectfully submitted,

 Joel P. Hall

Date: ~~August 23, 2017~~

~~October 27, 2017~~

 Joel P. Hall

January 8, 2018