

IN THE
SUPREME COURT OF THE UNITED STATES
_____ TERM _____

NO: _____

PAUL SCOTT KLEIN
Petitioner
- against -

Brian Williams, Sr. et al.,
Respondents

PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

PAUL SCOTT KLEIN #30918
High Desert State Prison
P.O. Box 650
Indian Springs, Nv. 89070

Respondents Counsels :

Nevada Attorney General
100 W. Carson St.
Carson City, Nv. 89701

S. Scott Greenberg, Esq.
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Las Vegas, Nv. 89146

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Questions Presented

- 1) Did The District Court Error When It Ignored Respondents' Confession To Not Providing, Having Physically Served A Written Notice Of Charges At Least 24 Hours Prior To Conducting A Prison Disciplinary Hearing Required By Wolff v. McDonnell, 418 U.S. 539, 94 S.Ct. 2963 (1974) And Entered Judgment Against Petitioner?
- 2) Did The District Court Error When It Ignored Evidence That Respondents Had Falsified Disciplinary Records To Conceal Their Violation Of Petitioner's Due Process Rights When They Did Not Serve A Notice Of Charges Upon Petitioner Prior To Conducting Prison Disciplinary Hearing. Wolff v. McDonnell, 418 U.S. 539, 94 S.Ct. 2963 (1974)?
- 3) Did The District Court Error When It Ignored Fact, That Respondents Did Not Post-Pone Or Cancell Prison Disciplinary Hearing At Least 24 Hours ~~Before~~ After Petitioner Had Been Served With A Notice Of Charges Wolff v. McDonnell, 418 U.S. 539, 94 S.Ct. 2963 (1974)?
- 4) Did The District Court Error When It Ignored Fact, That Respondents (Brill) Forged Petitioner's Signature On Two Disciplinary Documents So To Conceal Violating Petitioner's Due Process Rights Wolff v. McDonnell, 418 U.S. 539, 94 S.Ct. 2963 When He Failed To Provide Petitioner With Notice Of Charges?

5)

Did The District Court Error When It Concluded The Disciplinary Proceeding Was Conducted In Good Faith And Was Operating From Any Kind Of An Improper Motive Or Direction Or Anything Else And Oral Reading At Disciplinary Hearing Of Notice Of Charges Was Proper Without Providing Required 24 Hour Period After Written Notice Of Charges Are Served Prior To Conducting Hearing?

Parties

Petitioner: Appearing In Proper Person

Paul Scott Klein #30918

High Desert State Prison

PO Box 650

Indian Springs, Nv. 89070-0650

Respondents:

① Clark County School District

② Reid Kimoto

Are Represented By: → S. Scott Greenburg Esq
5100 W. Sahara Ave.
Las Vegas, Nv. 89146

Respondents:

③ L. Taylor

④ Howard Skolnik

⑤ G. Cox

⑥ Brian Williams, Sr.

⑦ Cheryl Burson

⑧ K. Smith

⑨ E. Burson

⑩ Wheelock

⑪ Patterson

⑫ Roy Plumlee

⑬ Vincent Hain

⑭ Schubert

⑮ Figueroa

⑯ M. Maxfield

⑰ Tony

⑱ Gusman

- ①9 Fr. Tocco
- ②0 Maryann Marsh
- ②1 Brill
- ②2 Magnum
- ②3 Ms. Hain
- ②4 Tracy Dory
- ②5 Leo Vath

#3 - #25 Are Represent By: → Nevada Attorney General
100 N. Carson St.
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Decisions Below

The decision of the United States Court of Appeals for the Ninth Circuit is unreported, and Petitioner does not its correct citation.

A copy is attached as Appendix A to this petition (AU). The order of the United States District Court, District of Nevada is attached as Appendix B to this Petition. (AU)

Jurisdiction

The judgment of the United States Court of Appeals for the Ninth Circuit was entered on October 2, 2017. An Order Denying Petition for Rehearing was entered on January 2nd, 2018, and a copy is attached as Appendix B to this Petition. Jurisdiction is conferred by 28 U.S.C. 125(1).

Constitutional And Statutory Provisions Involved

This case involves Amendment XIV to the United States Constitution, and the Amendment is enforced by Title 42 Section 1983 United States Code. Petitioner will fore go quoting these

well established and known Constitutional Amendments and United States Code, as Petitioner is certain the Honorable Justices are well aware of these laws and don't require a reminder.

Statement of the Case

On July 19, 2007, Petitioner who is housed at the Southern Desert Correctional Center, Clark County, Nevada, went to the education building and did give to Tracy Dory, several copies of Equal Employment Opportunity Commission (EEOC) Complaints that had been filed by various inmates. Defendant Co Boreon, Associate Warden of Programs (AWP) upon learning of Petitioner, now referred to as Klein, having given the aforementioned documents to Inmate Victim Coordinator, defendant T. Dory without obtaining her permission first, prepares a Notice of Charges against Klein alleging, he had attempted to compromise staff a major violation of Code of Penal Discipline pursuant to Nevada Dept of Corrections (NDOC) Administrative Regulations (AR) No. 707, and she orders Sgt. Murray (phonetic) to have Klein placed into Administrative

segregation, because she had determined, Klein was a threat to the safety and security of the institution, only because he had given copies of records to an NDOC employee without her approval, that under regulations was not required. Klein was put into Administrative Segregation (Ad-Seg) and give an Ad-Seg Notice per AR #803 that stated; defendant C. Borson ordered the Ad-Seg placement. This is the 1st step of the NDOC disciplinary process, and the "Disciplinary Form I" is the Written Notice of Charges (District Court, DC #250, p. 13 and 14)

Sometime after 11:30 p.m. on July 20, 2007, Klein is awakened by officers, who restrained him and escorted him to an office in Unit 8, ~~Southern Desert Correctional Center (SDCC)~~ Southern Desert Correctional Center (SDCC) where defendant Sr % Brill, was waiting with the completed "Summary of Hearing Officer's Inquiry And Disposition Forms, that are "Disciplinary Form II" and the 2nd step of NDOC's disciplinary process. At this stage, defendant Sr % Brill was to serve Klein a copy of the Written Notice of Charges, however, defendant Sr % Brill was not able to

to give Klein a copy of the Notice of Charges or a copy of the Summary of Hearing Officer's Inquiry and Disposition (Disciplinary Form I pages 1+2, and Disciplinary Form II pages 1 and 2) (See District Court Doc #250 p. 13-16). The defendant Sr. % Brill had ordered Klein to sign the one set of the aforementioned documents, but Klein refused to do so unless he was provided a set of the documents, and so sometime after July 21, 2007, 12:04 a.m. defendant Sr. % Brill printed out the documents and he forged Klein's signature, back dating it to July 20, 2007, at 11:30 p.m. some 34 minutes before being available to sign by any one. (See District Court Doc. 250 at p. 16-17 review p. 17 at signature receipt block and compare with "Run Date: July 21, 2007, 12:04 a.m." at the bottom left hand corner). During Bench Trial of February 14, 2012, Sr. % Brill offered numerous possible excuses or explanations for the time and date problems. The why isn't important but the failure to provide Klein with a Written Notice of Charges is and with such serious charges Klein was entitled to it, but instead,

Klein being half asleep, not fully aware, was forced to rely on what he may have been told by Sr % Brill who claimed, he had read the charges to Klein, which Klein disputes.

Sometime about or on July 23rd or 24th of 2007, Klein was released by an unknown individual from Ad-Seg, without appearing before a AR 503 AdSeg Classification Committee and he was returned to general population.

On August 17, 2007, Klein is ordered to appear at a disciplinary hearing before defendant Shubert. Upon arriving, Klein tells defendant Sgt. Shubert, that Sr % Brill had failed to serve him with Written Notice of Charges, and the charges had to be dismissed or continued 24 hours after Sgt. Shubert provided Klein with a copy. Sgt. Shubert did not understand why, he had made a notation on the "Disciplinary Form II" that said, "Sr % Brill had served Klein with Notice of Charges", and Klein, told Sgt. Shubert, that record is false, and if true, where is the signed receipt that comes with the Notice of Charges. Sgt. Shubert called Sr % Brill without any luck leaving message. Sgt. Shubert then

continued the disciplinary hearing, recording the hearing and he allowed me to read his copy of the Notice of Charges, and Klein was forced to present a defense. Sgt. Shubert informed Klein, he was ordered to find ^{me} him guilty no matter what the evidence and I could deal with it on appeal. Sr. % ~~Shubert~~ ^{Brill} called at about 2:20 p.m. and Sgt. Shubert on tape using speaker phone, questioned him about his recollection as to having served Klein with a Notice of Charges, and Sr. % Brill could not recall doing so. Klein, preserved this evidence by writing it upon the first page of his copy of the "Summary Of Disciplinary Hearing" (Disciplinary Form III), that was filed, attached to disciplinary appeal grievance #20062642471 on the same date of hearing, August 17, 2007, and logged received by defendant V. Klein on August 18, 2007. Sgt. Shubert found Klein guilty of a Penal Code violation No: M.J.51, compromising Staff and sanctioned Klein, 60 Days Disciplinary Segregation suspended for 180 days good conduct, and potential Cat. A Stat Time Referral. Defendant

Shubert, only provided Klein upon conclusion of the hearing, the Summary of Disciplinary Hearing pages 1 through 5, and did not provide Klein with a Notice of Charges (Disciplinary Form I, 2 pages) or the copy of the Sr%Brill, "Summary of Hearing Officer's Inquiry And Disposition, (Disciplinary Form II, 2 pages), and this lack of disciplinary records could get his appeal grievance denied as improper and not complete pursuant to AR #740 and AR #707.

On August 17, 2007, Klein then prepared and filed his disciplinary appeal, logged under NDOC Grievance Log No. 20062642471 Bench Trial Exhibit 7, Trial Transcript page 127), and defendant V. Hein collected it from SDCC Grievance Box on August 18, 2007. AWP. C. Burson approved the grievance as "proper" on August 22, 2007. The date Klein filed the disciplinary appeal grievance is extremely important, because he had attached his only copy of the disciplinary documents to the grievance, instead of waiting a day or two to make copies, and the "written notations" on page I, "Summary of Disciplinary Hearing" were

placed upon this record at the disciplinary hearing when the Sr. Brill call came in. Klein fully documents in his disciplinary appeal, exactly what had taken place during the hearing, and it is a valid record, that at Bench Trial, neither defendants Sr. Brill or Sgt. Sholbert could dispute, but only testified, that neither could remember details of the disciplinary hearing other than what was written in the documents. Now Klein's disciplinary appeal, approved as proper by defendant C. Burson, is then reviewed by defendant Warden B. Williams, Sr., who on September 12, 2007, at 9:22 a.m., stated; "I am in receipt of all of your documentation regarding your recent Notice of Charges. It is clearly noted that Sr. Brill was contacted and did not recall serving you the Notice of Charges. It is also noted that computer errors are present; this undoubtedly is due to staff becoming familiar with the NOTIS system. Your suit regarding alleged discrimination while the undercurrent of the alleged charges for which you went to disciplinary is not at issue here. nor is it within my purview to

comment on this matter. De facto it appears that the documents attached to your grievance are the materials which you attempted to have Ms. Dory forward through the Department. What I am considering is the substance and fact of the disciplinary you received. Based on Sgt. Schubert's notations and lack of substantive evidence, I find that your grievance is upheld." Now certainly, the Warden of a prison reviewing a prisoner's disciplinary appeal would not accept the prisoner's documents and statements as reliable, until he has compared them with the and verified them with the two officers involved. Now, defendant's counsel had attempted to make the Warden's statements as not establishing any opinion supporting fact, that Sgt. Brill could not recall serving Klein a Notice of Charges, (See Klein Trial Testimony), without simply just having the defendant Williams, Sr., testify as to what he may have or may have not meant.

Soon after Klein had filed the 42 USC 1983 civil rights

complaint, the defendants and their counsel, Nevada Attorney General, began pursuing Motions For Summary Judgment, and submitting other records in support of said Motions, and on November 17, 2010, at 10:00 a.m., in the United States District Court, District of Nevada, Before Honorable Valerie P. Cooke, the defendants argued their final Motion For Summary Judgment as to the sole remaining Count #15. The Court took possession from defendants, the original Notice of Charges, the Summary of Hearing Officers Inquiry and Summary of Disciplinary Hearing, and this is when the Court discovered, that there existed two different Summary of Hearing Officers Forms (Disciplinary Form II), and this should not have happened since only one set was prepared by defendant Sr. G. Brill on July 20 or 21st 2007. These inconsistent and unreliable disciplinary documents filed District Court Doc #239-1 and Doc #250 at page 5, both are the Disciplinary Form II's that are required when serving a Notice of Charges, Disciplinary

Form I, and one document contains a Statement of Inmate Section that has the Statement Klein did not make until August 17, 2007, during the disciplinary hearing, and the other document does not contain any Statement of Inmate.

Now, the defendants at Bench Trial had their I.T. Scott Howard testify as to the entry of the date of August 7, 2007, that stated, Klein had been served a Notice of Charges by Sgt. Brill, and this existed on both of the Disciplinary Form II's, and Mr. Howard stated, Sgt. Shubert had made the entry, but when questioned about the extra material in Exhibit 8, (District Court DOC #183) compared with District Court DOC #239 at page 6, Mr. Howard could not explain why the documents were different and should not have been. No one could verify which documents were authentic, and the Trial Court, District Court then in an abuse of discretion and authority, used the third party hearsay statement of defendant Sgt. Shubert, in the Disciplinary Form II's

stating, Sr. Brill had served Klein with Notice of Charges on August 7, 2007, even after both witnesses could not remember having ever done so when they testified. The transcripts of the November 17, 2010 hearing clarify the serious problem as to the reliability of defendants records and disciplinary documents.

The facts are, a) Klein was not given a written Notice of Charges on July 20 or 21st, 2007; b) Klein was never served a Written Notice of Charges on August 7, 2007; and c) Klein was not served a Notice of Charges even upon completion of the August 17, 2007 disciplinary hearing.

The District Court in its judgment had stated, that it believed, defendant Shubert did not harbor or possess ill will or hold malice toward Klein when he held a disciplinary hearing on August 17, 2007, however, this

defendant being an experienced correctional officer, had known, that under Wolff v. McDonnell, Klein had to receive a Written Notice of Charges at least 24 hours before any disciplinary hearing is held, and to force Klein to defend himself in a disciplinary hearing without his having a written Notice of Charges that would have allowed him to research and present a defense against the allegations, demonstrates a clear desire and plan to deprive Klein of his due process rights. Now, who erased only Klein's disciplinary hearing from the tape which had around 20 other disciplinary hearings recorded on it, that suffered no erasers, deletions or missing pieces of recordings? Altered disciplinary records, no signed receipt for the alleged Notice of Charges Sr. % Brill is alleged by Sgt. Schubert to have served on Klein on August 7, 2007, no Notice of Charges given to Klein at disciplinary hearing conducted on August 17, 2007 and a disciplinary

hearing recording that is only missing the recording of Klein's hearing, and a reasonable ~~inference~~ conclusion can be formed that supports the belief, that defendants involved did tamper with and destroy evidence in a clear conspiracy designed to deprive Klein of his civil rights. The District Court in its judgment gave Klein's evidence no weight and was slanted in favor of and toward defendants, and its Judgment must be vacated in the interests of justice and fair play.

Basis For Federal Jurisdiction

This case raises a question of interpretation of the Due Process Clause of the Fourteenth Amendment to the United States Constitution. The district court had jurisdiction under the general federal question jurisdiction conferred by 28 U.S.C. 1331.

Reasons For Granting The Writ

The holding of the courts below, that an inmate does

not need a written notice of charges prior to his/her having to appear at disciplinary hearing, that an oral reading of or from a written notice of charges at 11:30 p.m. to 12:04 a.m. the next morning constitutes being served with a Notice of Charges, that if inmate is allowed to read the Notice of Charges for first time at a disciplinary hearing constitutes his being served timely, and that disciplinary hearing officer who had been informed by inmate, that he/she had never been given a written notice of charges can make inmate defend himself and can find him/her guilty of the charges. see Wolff v. McDonnell, 418 U.S. 539, 94 S.Ct. 2963 (1974); Payne v. Axelrod, 871 F.Supp. 1551 (N.D.N.Y. 1995); Brown v. District of Columbia, 66 F.Supp.2d 41 (D.D.C. 1999); Benitez v. Wolff, 985 F.2d 662, 665 (2nd Cir. 1993); Powell v. Ward, 562 F.Supp. 274 (S.D.N.Y. 1983); Beyes v. Henderson, 121 Misc.2d 970, 469 N.Y.S.2d 520 (N.Y.Supp. 1983); Sira

v. Morton, 380 F.3d 57, (2d Cir. 2004) and Need v. State, 118

Idaho 207, 795 P.2d 912 (Idaho App. 1990).

Importance Of The Questions Presented

This case presents a fundamental question of the interpretation of this Court's decision in Wolff v. McDonnell, 418 U.S. 539, 564, 94 S.Ct. 2963 (1974). The questions presented is of great public importance because it affects the operations of the prison systems in all 50 states, the District of Columbia, and hundreds of city and county jails. In view of the large amount of litigation over prison disciplinary proceedings guidance on the questions is also of great importance to prisoners, because it affects their ability to receive fair decisions in proceedings that may result in months or years added to incarceration or harsh punitive confinement.

The issue's importance is enhanced by the fact that the lower courts in this case have seriously misinterpreted

Wolff. This Court held in Wolff, that inmates must receive written notice of charges against them at least 24 hours before the hearing. Wolff at 564. The purpose of the notice is to inform the inmate of the charges and to enable him to marshal the facts and prepare a defense. Wolff at 564. Accordingly, the prisoner must be allowed to retain possession of the notice pending the hearing. Benitez v. Wolff, 985 F.2d 622, 665 (2d Cir. 1993)

The lower court's reasoning, that Sr. Brill's reading of a Notice of Charges on July 20, 2007 was sufficient Notice is contrary to this Court's holding in Wolff, and ^{court's} ~~its~~ reasoning, "that it is interesting that there has been no dispute by any body over the charge", again is contrary to the Court's decision in Wolff, because not only did the defendants ~~fail~~ to provide Klerh with a Notice of Charges, the defendants, Williams, Sr, a month later

dismiss the charge remaining as without support.

The lower court's reasoning, that it did not matter whether or not, the Notice of Charges must be given to the inmate prior to disciplinary hearing required under NDOC, A.R. #707 is flawed, being the due process requirements of NDOC A.R. #707 are modeled after this court's decision in *Wolfe*.

Thus the lower court seriously misinterpreted *Wolfe*, by failing to distinguish between the written Notice of Charges that allows for a prisoner to prepare, and an oral presentation of a Notice of Charges that allows for misunderstandings and lapses of memory to occur, and further, the NDOC, Administrative Regulations (AR) as AR.707 specifically sets forth the procedures involved with its disciplinary process, and the lower court cannot simply dismiss this regulation because, it desires to allow defendants a way out by saying, the prisoner was read

the Notice of Charges, that the hearsay statement by defendant Sgt. Shubert is the "Disciplinary Form II", one of two versions that could not be authenticated because, of additional material added to it, supports a belief, that inmate was served a Notice of Charges on August 7, 2007 by defendant Sr % Brill or why else would defendant Sgt. Shubert have taken the time to enter such a notation, even though, defendant Sr % Brill nor defendant Sgt. Shubert have a clear memory of the events occurring on August 7, 2007, and if the defendants had carried out their obligation and responsibility to follow and obey the NDOC Regulations pursuant to, (then version 2007) A.R. 100, AR 105, AR 339 and AR 340 which makes their compliance mandatory, not discretionary and their failure to do so ^{could} ~~can~~ result in termination of employment pursuant to AR 339 and AR 340, defendants Sr % Brill and Sgt. Shubert would have simply made a copy of the

Notice of Charges, they've held so tightly and closely, and presented it to Klein with the Receipt of Service, that Klein and one of the defendants would have dated and signed availing all that transpired later which included, the filing of a Civil Rights litigation that has dragged on now ten (10) years, and continues since the reversal of around thirteen (13) counts dismissed in error back in 2008 by the lower court.

This Great Court must get involved in this case, and make certain, that prison officials and correctional officers follow their Department's Regulations as to how to handle disciplinary processes, that are born from the decisions issued by this Court, which set forth precisely, the due process requirements of Wolff. The lower courts cannot be allowed to create excuses and formulate justifications for defendants to hide behind, such as "computer problems" not defined, that did not prevent nor create new problems

if defendants Sr Ball or Sgt Schubert had simply photocopied the Original Written Notice of Charges, and delivered it to Klein as NDOC, HR 707 and WLF resumes, 24 hours prior to conducting a disciplinary hearing. Klein as with the lower court, now speculates and makes an inference using defendant's Sgt Schubert's testimony offered on February 14, 2012, that the disciplinary recording with only Klein's disciplinary erased, deleted or otherwise removed, was not an accidental occurrence, but a deliberate act by defendants, Williams Sr, C. Burton, Sr & Ball and possibly by Sgt. Schubert so to make certain Klein does not prevail, and defendant Sgt Schubert's own testimony supports this inference and presumption of Klein's, when he testified, he had never seen that happen before ever during his employment and handling of hundreds of disciplinary hearings with recordings. Sgt Schubert used the word "NEVER".

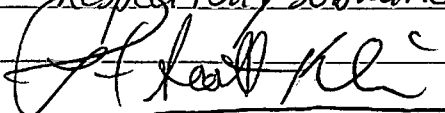
In closing, this Court must not allow the judgment of the lower court to remain in force and effect, since its entire reasoning is based upon its determination and choice, to pick bits and pieces of records, unreliable documents, hearsay notations not supported by testimony or with signed receipts, taken from documents that contain materials added by unknown 3rd parties, that an Information Technician, S. Howard could not explain, present speculation as proof as to why a third party (Shubert) would make an data entry as to serving Klein with written Notice of Charges, without including fact, that the records used, Disciplinary Form II's could not be confirmed reliable or accurate, that the oral reading of Notice of Charges satisfies due process requirements set forth in Wolff and NDOE, AR 707, that being allowed to read Notice of Charges after hearing has begun satisfies due process requirements in Wolff and NDOE, AR 707, and

that due process is satisfied, even if Klein isn't given a written Notice of Charges prior to or after disciplinary hearing since disciplinary hearing officer Sgt. Shoberg had already determined Klein was guilty, based upon his belief, sufficient evidence existed to support his finding of guilty. This type of conduct within a prison environment can and often leads to abuses by correctional staff, as in the instant case, and without outside direction or without fear of facing justice these defendants have no reason or motivation to change their unlawful unconstitutional conduct.

Conclusion

For the foregoing reasons, certiorari should be granted in this case,

Dated this 19th day of March, 2018

Respectfully submitted


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