

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

Francisco Argon

(Your Name) — PETITIONER

VS.

CDCR/BPH et al.,
_____ — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Court of Appeals Ninth Circuit

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Francisco Argon

(Your Name)

Deuel Vocational Institution P.O.BOX.600

(Address)

Tracy, California 95378-0600

(City, State, Zip Code)

(Phone Number)

QUESTION(S) PRESENTED

1. Respondant officer R. Sutter's inaccurate information falsely accusing Petitioner of Flashing was false report violating Penal Code and Sexual Harassment.
2. Petitioner felt threatened when prison officer's while performing their Color of authority duty slandered him calling him "Gay" committed Sexual Harassment, discrimination and disrespect
3. Officer R. Marsden used State Computer to commit libel and slander defamation and discrimination to Sexual harass petitioner when he showed the inmate Smith misleading confidential information from computer.

CONCLUSION

QUESTIONS PRESENTED

1 This case presents a fundamental question of the interpretati-
2 on of this Court's decision in Wolff V. Mc Donnell, 418 U.S. 539, ct., -
3 2963 (1974). The question presented is of great public importance
4 because it affects the operations of prison systems in all fifty
5 States, the District of Columbia, and hundreds of city and County -
6 jails.

7 In view of the large amount of litigation over prison disciplinary
8 proceedings, guidance on the question is also of great importance
9 to the judiciary. In addition, the question is of great importance
10 to prisoners, because it affects their ability to receive fair de-
11 cisions in proceedings that may result in months or years of added
12 incarceration or harsh punitive confinement.

13 The issue's importance is enhanced by the fact that the lower co-
14 urts in this case have seriously misinterpreted Wolft. This court
15 held in Wolft that prisoners have a limited Right to call witnes-
16 ses, the Court Reiterated this point in Ponte V. Real, 471 U.S. 491, 4
17 497, 105 S.Ct. 2192 (1985). and added that prison officials have th
18 the burden of explaining the Reasons for refusing to call witness
19 ses in a particular case.

20 The common sense understanding of "calling" a witness is bringing
21 the witness into the proceeding to give testimony, and nothing in
22 Wolft or ponte suggests otherwise. Both cases acknowledge that the
23 there are Security and other concerns that may Require limiting
24 prisoners' due process Rights in particular cases.

25 However, those concerns are accommodated by permitting prison offi-
26 cials to bar witnesses when calling them would be "unduly hazar-
27 dous to institutional safety or correctional qualis". 418 U.S. at -

28 566 As one court observed, the reasoning of Wolft simply does not-

1 suport

2 a blanket policy against allowing witnesses to be
3 present at the hearing. The Court appears to have con-
4 templated individualized determinations of the pote-
5 ntial threat to security created by the presence of
6 the inmate at the interview....

7 Requiring prison officials to determine on an indivi-
8 dual basis whether witnesses can be present encourages
9 ges them to exercise their discretion to strike the
10 appropriate balance between the prisoner's Right to
11 call witnesses and the prison's need to maintain order.

12
13 Powell V. Ward, 487 F.Supp.917,928-29 (S.D.N.Y.1980) aff'd as modi-
14 fied, 643 F.2d 924 (2d Cir.), cert, denied, 454 U.S.832 (1981).

15
16 The lower court's Reasoning that witnesses never need ac-
17 tually appear at the hearing is unconvincing. It relied on
18 a case from the Second Circuit that does contain that hold-
19 ing, See Bolden V. Alston, 810 F2d 353,358 (2d Cir.0, Cert
20 denied, 484 U.S.896 (1987). However, Bolden based its condi-
21 tion on Baxter V. Palmigiano, 425 U.S.308,322,96 S.Ct 1551
22 (1976)-a case that dealt only with witnesses against the
23 inmate. The Court in Wolff held that a prisoner has no Ri-
24 ght in a disciplinary hearing to confront the witnesses
25 against him.

26 However, it did not extend this holding to witnesses calle-
27 ed by the prisoner. Instead, it provided for the exclusion
28 of witnesses called by the prisoner only when "unduly -

1 b hazardous to institutional safety or correctional goals."

2 This standard permits prison officials to exercise their
3 discretion to exclude witnesses when a particular case
4 warrants it, while preserving the prisoner's Right to call
5 witnesses when there is no reason to exclude them.

6 The district court Seriously misinterpreted Wolff by fail-
7 ing to distinguish between witnesses against the prisoner
8 and witnesses for the prisoner.

9 The Court should correct that misinterpretation and make
10 it clear that witnesses called by the prisoner should ap-
11 pear at the hearing unless such a personal appearance wo-
12 uld be unduly hazardous to institutional safety or corre-
13 ctional goals.

14 For the foregoing reason, certiorari should be granted in
15 this case.

LIST OF PARTIES

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

[x] 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:

1. Petitioner Inmate. Francisco Argon
2. Defendant Correctional Officer. R. Sutter
3. Defendant Lieutenant L. Scotland
4. Defendant Warden (A) E. Arnold
5. Defendant BPH Presiding Commissioner Cynthia Fritz
6. Defendant Asistent Warden G. Mattason
7. Defendant Lieutenant Derncourt
8. Defendant Forensic Evaluator: Robert E. Record, Ph.D.
9. Defendant Captain T. Wamble
10. Defendant Asistent Warden M. K. Young
11. Defendant CC-I R. Rivas
12. Defendant Correctional Officer T. Webster
13. Defendant Correctional Officer R. Marsden
14. Defendant Inmate T. Smith
15. Defendant BPH Deputy Commissioner Khateen Newman

DISCLOSURE STATEMENT

1 In April of 2010, I arrived at CSP-Solano. I was placed in
2 bldg # 24, cell 146. Lower bunk. c/o. R. Sutter immediately began to mis-
3 treat me. I would say "Good morning" but would not respond I would
4 make threats toward me, but I did not know why.

5 One day, during a lockdown, I informed c/o. Sutter that I did
6 not eat meat I showed him mi I.D., to which he responded by saying
7 to his co-worker c/o. Hernandez: "This fool don't want to eat meat" I
8 asked him why he treated me in such a fashion, why all the threats
9 and disrespect when all I ever did was show him & other staff the
10 at most respect? To this he did not respond, and I walked away.

11 I was in the shower one day. I saw him looking at me but I paid
12 his scrutiny of me no particular attention. I just continued to
13 shower. I noticed while I was in the A-section shower that chair was
14 in a higher position than c/o. Kjaer his partner. Noticing this, I avoided
15 him and attempted to "hide" myself from him while showering. I'd
16 use the shower in the corner. This I did for over ten (10) consecutive
17 showers.

18 One day after yard many I/M's were showering and I also showered.
19 I used the shower closet to the barrier, the 1st shower. I was
20 the last one to enter the shower. Someone got my attention and told
21 me the c/o. was looking at me. I turned to see c/o. R. Sutter in the
22 same elevated position I saw him in before. I showered in the normal
23 fashion, all the time facing the shower spout.

24 I never turned my body in the direction of the podium. The only
25 part of my body that ever faced the podium was my face when the
26 I/M told me Sutter was watching me.

27 In my file is documentation that I once threatened staff while
28 at Tehachapi State Prison. This incident never occurred, -

1 however, the accusation remains in my C-File. C/O. Sutter saw this and
2 allowed it to prejudice him against me.

3 As it turned out, he was attacked when he worked at San Quentin
4 he assumed that I was "that type of prisoner" so he plotted against me.

5 Cpt. T. Wamble and A.W.K. Young investigated the case in 2010.
6 they found the barrier covers all inmates while showering. These was
7 never a 115, 128, or any confidentials filed.

8 c/o. R. Sutter, along with his co-workers, did what they could to
9 help Lt. L. Scotland uncover "EVIDENCE" to use to interfere or stop my
10 transfer requests. Lt. L. Scotland used the excuse that I had once es-
11 caped from custody while serving time in New York. As mentioned befo-
12 in this complaint, two separate transfers were stopped by Lt. L. Scotla-
13 nd's interference.

14 In 2013, c/o. Y. Ofaire tried to plant evidence in my bunk area
15 she enlisted the help of other c/o's. I appealed her actions. I fought
16 against her efforts to set me up all the way to the 2nd level, when I
17 was moved from bldg. # 24 to 19. Upon my arrival, c/o. Wilkingson said to
18 c/o. T. Webster "Here I have the inmate from building 24 shower problem
19 c/o. T. Webster answered "Nothing can be seen from the podium to the
20 shower" c/o. Wilkingson then stated "This is not a problem" less than 30
21 days later, the shower barriers were lowered 5-6 inches lower so that
22 anyone at the podium could see into the shower.

23 One day c/o. Wilkingson and c/o. Hudson were working together,
24 Hudson was seated on the right side of the podium while Wilkingson
25 was on the left. Wilkingson asked her coworker to look toward the
26 A-section shower where I was showering.

27 As he was looking, she asked him: "Can you see now?" he replied
28 "Yes. I can see now."

1 This is the type of arassment I was forced to endure during the
2 time I spent in both building # 24 and 19. This was carried out openly
3 as if they did not fear repercussion. This period covered the 2010-
4 2016 era.

5 From '10-'12, c/o. R. Sutter accused me of flashing him, c/o's.-
6 Black and Farinas accessed my records and attempted to use them to
7 harass me, c/o. Y. Ofaire tried on numerous occasions to plant weapons
8 in my bed area, along with the help of c/o. C. Murray, c/o. Savangsy even
9 went so far as to tell me he could kill me if he so desired.

10 From '13-16, when I was in Bldg #19, c/o. T. Webster tried to fur-
11 ther another so-called flashing charge against me. c/o.. Baekly taun-
12 ted and ridiculed me wherever the feeling came upon him. Even the As-
13 sociate Warden was quoted as telling him that the c/o's could look
14 into any shower any time he or she chose to.

15 C/O. R. Marsden used his position of authority to pressure me
16 constantly. He would watch me shower as if that was his only duty!
17 he would look at me with hate and contempt up until the day I left
18 c/o. R. Marsden told I/M. T. Smith CDCR # E-00820, that I was gay, and he
19 could "f--k" me.

20 I request this Honorable Court sent an investigator to inter-
21 view me personally so that I can explain in detail the crimes commit-
22 ted against me. This investigator must be fluent in Spanish as my
23 English is not good enough to accurately convey my case. (These plea-
24 dings are written by another inmate who took my broken English and
25 transcribed it as best as he could under the circumstances.)

26 Again, I contend that c/o. R. Sutter's motivation to harass me
27 comes from an inmate who tried to do him great bodily harm while he
28 was working at San Quentin.

The plaintiff, Inmate Francisco Argon, CDCR #E-73850, suffered over six years of continuous stress, nervousness, mental anguish, anxiety, an eating disorder, and many other conditions for which I do not know the names. What I do know is I slept with fear and I woke up with the same fear in my body. All of this because I had no idea what the C/O's were going to do to me the next day, week, month, or at any time. I lived like this for over six years.

C/O R. Sutter, who, from the time he saw my record from Tehachapi State Prison, began to bother me on many occasions in his attempts at getting revenge for what other inmates did to him at San Quentin, where he worked many years ago.

The inmate who tried to kill him was Black. An assault was orchestrated by the C/O's in the building I was housed in against me. This occurred after the investigation into C/O R. Sutter's allegation against me for allegedly flashing him while showering. The results of the investigation revealed in me being found not guilty of the charge. It was also revealed during the investigation that at the time of the accusation, the height of the shower barrier prevented anyone at the podium where C/O R. Sutter was stationed from seeing the genital region of any inmate showering.

This finding only angered C/O R. Sutter further and he convinced his colleagues to harass me and terrorize me. Those officers names are: Lt. L. Scotland, CCI R. Rivas, C/O T. Webster, C/O R. Marsden, Lt. Derncourt, A.W. G. Matteson, and off of the general facility, Warden E. Arnold, BPH Commissioners Cynthia Fritz, Presiding Commissioner, and Deputy Commissioner Khateen Newman, and one inmate, I/M T. Smith.

After the year 2015, one of the two cases was dismissed. Although I have many other officers against me (there were more on the list), I only put on the list those whom I have evidence against. None of these defendants witnessed anything. They believed C/O R. Sutter, not knowing whether he told the truth or not. It is the Court's responsibility, however, to show where the truth lies.

During the year 2010, and on through 2017, I have had a lot of medical problems. Those problems include: stress, depression, chest pains, and three dyrrhythmias, each one lasting from one minute to two hours! One heart attack on April 26, 2016.
See Medical Exhibit #E

Starting in January of 2016, and on to the present, I have experienced problems moving my fingers; the right middle finger, and the third, fourth and fifth fingers on my left hand. I have to put them back into position. All of this discomfort is caused by the stress, which also made me eat too much. I just recently learned to control that.

The stress caused me to be gluttonous, which brought on chest pain, arrythmia, blocking of the arteries, elevating to percarditis, or injury to my heart. I now need to drink heart medication and will have to do so for the rest of my life. The damage caused by the heart attack to my heart is irreparable. All this stems from the stress these correctional officers caused me to endure for over six years.

See Medical Exhibit #E

In 2014, I went back before the BPH after a 5-year denial. I tried to explain to the Board my problems. The more I tried, the more they misunderstood. This compounded my stress. I felt mad. The BPH ordered me to get "anger management" and denied me for three years. It was at this time that I saw the confidential information in my file. I asked the Board if it came from C/O R. Sutter. Commissioner Marisela-Miramontes told me no. I suspected I needed an investigator. I mailed my Civil Rights Complaint to the Court via Legal Mail, but apparently the Complaint never left the prison. I wrote to the Attorney General, and the Warden sent his investigator. (See Exhibit #'s C-16, C-17, and C-18.)

In 2015 my BPH Form 1045 was approved. I went to the Board on July 9, 2015. Eight days before, I saw Lt. Derncourt with Ms. G. Matteson (AW) in the gym planning the Culture Day Celebration. On July 9, 2015, during the BPH break time, I saw Lt. L. Scotland. This was at 1340 hours. the BPH later denied me a release date, citing they had received "information" from Lt. L. Scotland. this "information" was the false complaint and false 602, and the administrative process that followed. This stress led to me having a heart attack on July 22, 2016.

See Exhibits #

As a direct result of the correctional officers' continued harassment, the following occurred: "Cardiac-arrythmia", which is a heightened heart rate, call it "extreme" or "maximum"; serious discomfort in my chest; "fast heart;" 4-22-16 acute infarction; I had my chest wall palpatated, there was noted tenderness in the region, with elevation in the leads in the range of V4 to V6; I was in emergency cardiac catheterization; I was administered twice the normal amount of recommended doses of medication to gain control of and stablize the cardiac episode (heart attack); I now have a "history of heart problems," atherosclerotic cardiovascular disease, of which did not exist before the dealings with the before-named C/O's; I have recieved prescriptions of four 4,000 units of Heparin, a narcotic drug; and during my time at Solano State Prison, from the time of the false accusation and continuing for more than six years afterward, I have experienced and suffered through intermittent chest pains at least one per week!

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

TABLE OF CONTENTS

OPINIONS BELOW	1
JURISDICTION	1
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	3
STATEMENT OF THE CASE	5
REASONS FOR GRANTING THE WRIT	17
CONCLUSION	1

INDEX TO APPENDICES

c

APPENDIX A	#A-1:U.S.COURT OF APPEALS NINTH CIRCUIT DENIED 2/22/18 #A-2:STATE SUPREME COURT DENIED ON NOVEMBER 9,2016 #A-3:SUPERIOR COURT DENIED PETITION ON APRIL 11,2016
APPENDIX B	#B-1:MEDICAL EVIDENCE/#B-2 MEDICAL EVIDENCE;#B-3 MEDICAL EVIDENCE AND #B-4 MEDICAL EVIDENCE
APPENDIX C	#C-1:BPH EVIDENCE,#C-2 BPH EVIDENCE,#C-3 BPH EVIDENCE #C-4: BPH EVIDENCE AND #C-5 BPH EVIDENCE;ALSO THE APPE- #C-6:BPH EVIDENCE FALSE ACCUSATION
APPENDIX D	#D-1:BPH EVIDENCE,#D-2 BPH EVIDENCE AND #D-3 CDCR EVIDENCE
APPENDIX E	#E-1:CDCR EVIDENCE,#E-2 PETITIONER EVIDENCE,#E-3 CDCR EVI- DENCE,#E-4 CDCR EVIDENCE,#E-5 CDCR EVIDENCE,#E-6 CDCR EVIDENCE AND #E-7 CDCR EVIDENCE
APPENDIX F	#F-1:CDCR EVIDENCE

TABLE OF CONTENTS

OPINIONS BELOW	1
JURISDICTION.....	
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	
STATEMENT OF THE CASE	
REASONS FOR GRANTING THE WRIT	
CONCLUSION.....	

INDEX TO APPENDICES

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F #F-2:The petitioner using Wheel chair and conting on
Defendants retaliation on a prison are not Medical
Facility
#F-3:Are Medical Record where the Dr.Hla Win denial
my medical examination
#F-4:Evidencia the c/o.T.Webster continued against
the petitioner;APPENDIX-#F-5 second page
#F-6:And APPENDIX?#F-7 are for I searched for my case
#F-7:And APPENDIX:F-8 where the commissioners of the
Board of Parole Hearing continuing against the
petitioner for he looking for Justice and they not
And also APPENDIX-9

TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBER
Defendant: C/o R. Sutter <u>Hudson V. McMillan</u> , 503 U.S. 1, 6, 7?	Page: Reason for Grant Page No. 6
<u>Farmer V. Brennan</u> , 511 U.S. 825	
<u>Halley V. Cross</u> , 86 F.3d 630, 642 (7th Cir. 1996)	
<u>Velez V. Johnson</u> , 395 F.3d 732, 736 (7th Cir. 2005)	
Also, C/o R. Sutter, <u>Smith V. Cochran</u> , 339 F.3d 1212-13 (10th Cir. 2003).	Page: Reason for Grant Page No. 6
Defendant: Scotland Lieutenant, <u>Hudson V. McMillan</u> , 503 U.S. 1, 6, 7;	Page: Reason for Grant Page No. 6
<u>Farmer V. Brennan</u> , 511 U.S. 825;	
Also, Lt. L. Scotland.	Page: Reason for Grant
STATUTES AND RULES	
<u>Wolff V. McDonnell</u> , 418 U.S. 539, 556-58.)	Page No. 7
Defendant: E. Arnold Warden. <u>John V. Adams</u> , 969 F.2d 228, 235 (6th Cir. 1992):	Page: Reason for Grant Page No. 7
<u>Simkins V. Bruce</u> , 406 F.3d 1239-1242-43 (10th Cir. 2005),	
<u>Hoskins V. Lenear</u> , 395 F.3d 372, 375 (7th Cir. 2005)	
Defendant: C. Fritz, Commissioner BPH <u>Wolff V. McDonnell</u> , 418 U.S. 539, 556-58	Page: Reason for Grant Page No. 7
Defendant: G. Mattason, Assist Warden <u>Siggers-El V. Barlow</u> , 412 F.3d 693 (6th Cir. 2005)	Page: Reason for Grant Page No. 8
<u>Hoskins V. Lenear</u> , 395 F.3d 372, 375 (7th Cir. 2005).	
OTHER	
Defendant: Lt. Denercourt, Lieutenant.	Page: Reason for Grant
<u>Hoskins V. Lenear</u> , 395 F.3d 372, 375 (7th Cir. 2005)	Page No. 8
<u>Wolff V. McDonnell</u> , 418 U.S. 539.)	

TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBER
Defendant: R.E. Record Ph.D.	Page: Reason for Grant
<u>Holff V. McDonnell</u> , 418 U.S. 539.)	Page No. 8
	Line. 13-22
<u>Hudson V. McMillan</u> , 503 U.S. 1, 6-7:	
Defendant: Cpt. T. Wamble, Investigator.	Page: Reason for Grant
<u>Christopher V. Harbury</u> , 536 U.S. 405, 414.)	Page No. 8-9
	Lines. 23-28
<u>Hudson V. McMillan</u> , 503 U.S. 1)	Line No. 1-8
Defendant: K. Young, Assist Warden.	Page: Reason for Grant
<u>Christopher V. Harbury</u> , 536 U.S. 403, 414.)	Page No. 9
	Lines. 4-9
<u>Farmer V. Brennan</u> , 511 U.S. 825.)	
Defendant: R. Rivas, CC-1 Transfers.	Page: Reason for Grant
	Page No. 9
	Lines. 10-15
STATUTES AND RULES	
<u>Velez V. Johnson</u> , 395 F.3d 732 736, (7th Cir. 2005))	
Defendant: c/o T. Webster., Never Stop,	Page: Reason for Grant
<u>Flait V. North America Watch Corp.</u> , 3 Cal. App. 4th 467.	Page No. 9
	Lines. 16-23
<u>Ellison V. Brady</u> , 924 F.2d 872 (9th Cir. 1991)	
Defendant: C/o R. Marsden,	Page: Reason for Grant
<u>Smith V. Cochran</u> , 339 F.3d 1205, 1212-13 (10th Cir. 2003)	Page No. 9
	Lines. 24-28
	Page No. 10: Lines. 1-3
Defendant: I/m. T. Smith.	Page: Reason for Grant
<u>PC §261 (a)(2); People V. Iniguez</u> , 7 Cal. 4th 847;)	Page No. 10
	Lines. 4-8
Defendant: C	
OTHER	
Defendant: C. Newman, Commissioner BPH	Page: Reason for Grant
<u>Wolff V. Donnell</u> , 418 U.S. 539, 556-58.)	Page No. 10
	Lines. 9-22
<u>Siggers-El V. Barlow</u> , 412 F.3d 693 (6th Cir. 2005.)	

TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

<u>Harper V. Harris County, Tx.</u> 21 F.3d 597 (5th Cir. 1994)	Statement of the case Page.No.1
<u>Jacob, Visoni & Jacob Co. V. City of Lawrence, KS.</u> 927 F.2d 1111 (10th Cir. 1991)	Statement of the case Page.No.1
<u>Estell V. Gamble</u>, 429 U.S. 97, 50 Fed. 2d 251, 97-1 SCT. 285 (1976)	Statement of the case Page.No.1
<u>De Weese V. Town of Palm Beach</u>, 812 F.2d 1365- (11th Cir. 1987)	Statement of the case Page.No.1

STATUTES AND RULES

<u>Armstrong V. Wilson</u>, 124 F.3d 1019 (9th Cir. 1997)	Statement of the case Page.No.1
Regulations (CCR) 3401, 5 Staff misconduct C/o R. Marsden sent the inmate T. Smith to attack the Petitioner Physical and sexual, C/o R. Marsden unethical conduct department violation 15 CCR 3391.(a)-(b)(c)(d). SEE also <u>Chaker V. Crogan</u>, (9th Cir. 2005) 428 F.3d 1215	

OTHER

TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBER
<u>Hudson V. McMillan</u> , 503 U.S. 1, 6-7;	
also <u>Farmer V. Brennan</u> , 511 U.S. 825	PETITIONER PRESENTED VIOLATIONS
<u>Halley V. Cross</u> , 86 F.3d 630, 642 (7th Cir. 1996)	
<u>Velez V. Johnson</u> , 395 F.3d 732, 736 (7th Cir. 2005).	
<u>Smith V. Cochran</u> , 339 F.3d 1212-13 (10th Cir. 2003)	
<u>Wolff V. McDonnell</u> , 418 U.S. 539, 556-58.)	
<u>John V. Adams</u> , 406 F.2d 228, 235 (6TH Cir. 1992)	
<u>Simkins V. Bruce</u> , 406 F.3d 1239-1242-43 (10th Cir. 2005)	
<u>Hoskins V. Lenear</u> , 395 F.3d 372, 375 (7th Cir. 2005)	
<u>Siggers-El V. Barlow</u> , 412 F.3d 693 (6th Cir. 2005;	
STATUTES AND RULES	
<u>Holff V. McDonnell</u> , 418 U.S. 539.	
<u>Christopher V. Harbury</u> , 536 U.S. 405, 414.)	
<u>Flait V. North American Watch Corp.</u> , 3 Cal.App.4th 467;	
<u>Ellison V. Brady</u> , 924 F.2d 872 (9th Cir. 1991)	
<u>Wilson V. Seiter</u> , 501 U.S. 294, 297-303.	
(PC §261 (a)(2); <u>People V. Iniguez</u> , 7 Cal.4th 847;)	

OTHER

TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

STATUTES AND RULES

PAGES CITED

STATEMENT OF THE CASE:

Violated 15 California Code at Constitutional
First Amendment Claim at Retaliation Under §1983

Harper V. Harris County, Tx, 21 F.3d 597 (5th Cir.1994)

Jacobs, Visoni & Jacobs Co. V. City of Laurence, KS,

Estell V. Gamble, 429 US 97, 50 LEd 2d 251, 97 SCT.285 (1976)

De weese V. Town of Palm Beach, 812 F.2d 1365 (11th Cir.1987)

Armstrong V. Wilson, 124 F.3d 1019 (9th Cir.1997)

Chaker V. Crogan, (9th Cir.2005) 428 F.3d 1215

OTHER

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 A-1 to the petition and is

☒ reported at Reconsideration Denied on 2/22/18; 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 U.S. Eastern District on 1/27/17; 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-2 to the petition and is

☒ reported at Supreme Court denied on 11/09/16; or,
[] has been designated for publication but is not yet reported; or,
☒ is unpublished.

The opinion of the Superior Court denied on 4/11/16 court appears at Appendix A-3 to the petition and is

☒ reported at Habeas Corpus on 10/02/15; or,
[] has been designated for publication but is not yet reported; or,
[] is unpublished.

JURISDICTION

☒ For cases from **federal courts**:

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

☒ 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: 2/22/18, and a copy of the order denying rehearing appears at Appendix A-1.

☒ An extension of time to file the petition for a writ of certiorari was granted to and including 60 Days Denied (date) on 3/5/18 (date) in Application No. 1 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 Denied.
A copy of that decision appears at Appendix A-2.

☒ A timely petition for rehearing was thereafter denied on the following date: 11/09/16 denied, and a copy of the order denying rehearing appears at Appendix A-2.

☒ An extension of time to file the petition for a writ of certiorari was granted to and including 60 days (date) on 3/5/18 denied (date) in Application No. 1 A Letter.

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

	PAGE
<u>Defendant:</u> C/o.R.Sutter. Fight Amendment Violation	REASON FOR GRANT Page.No.6 Lines.1-16
<u>Defendant:</u> Lt.Scotland. 1st. and 8th Amendment Violation to the U.S. Constitution	Reason for Grant Page.No.6 Lines.17-28 PG.No.7:Line51-5
<u>Defendant:</u> E.Arnold,Warden. (42 U.S.C. §1983.) First Amendment Violation	Page:Reason for Grant.Page No.7 Lines.No.6-19
<u>Defendant:</u> C.Fritz,Commissioner BPH. 14th Amendment Violation	Page Reason for Grant.Page.No.7 Lines.20-26
<u>Defendant:</u> G.Mattason,Assist Warden First Amendment Violation	Page Reason for Grant.Page No.7-8 Line.1-5
<u>Defendant:</u> Lt.Denercourt. First Amendment Violation	Page Reason for Grant.Page.No.8 Lines.No.6-12
<u>Defendant:</u> R.E.Record Ph.D.BPH.Doctor. 14th Amendment Violation	Page:Reason for Grant.Page No.8 Lines.13-22.
<u>Defendant:</u> CPT.T.Wamble,Investigator the case. Due Process Clause 5th Amendment Violation	Page.Reason for grant.Page No.8-9 Lines.23-27 and 1-3
<u>Defendant:</u> K.Young,Assist Warder. Due Process Clause 1st.and 5th Amendment Violation.	Page.Reason for Grant.Page.No.9

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Defendant: R.Rivas, CC-I Transfers.

5th Amendment Violation

Reason for Grant
Page No.9
Lines.10-15

Defendant: C/o.T.Webster,.

Civil Rights Act of 1964 §2000e-(a)(1),
8th Amendment Violation.

Reason for Grant
Page No.9
Lines.16-23

Defendant: C/o.R.Marsden.

8th Amendment Violation.

Reason for Grant
Page No.10
Lines.1-3

Defendant: I/m.T.Smith.

8th Amendment Violation

Reason for Grant
Page.No.10
Lines.No.4-8

Defendant: G.Newman, Commissioner BPH.

14th Amendment Violation.

Reason for Grant
Page No.10
Lines.9-22

Statement of the case on page No.1

- 1.Fourth Amendment Violation
- 2.Fifth Amendment Equal Protection Violation
- 3.Eighth Amendment Violation
- 4.Fourteenth Amendment Violation
- 5.Americans with Disabilities Act (ADA)

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

First Amendment

Fourth Amendment

Fifth Amendment

Eight Amendment

Fourteenth Amendment

American with Disabilities Act

Civil Right Act of 1964, §2000e-2 (a)(1):

STATEMENT OF THE CASE

1. Petitioner challenges a July 2015 decision by the Board of Parole Hearings (Board), denying him parole. ECF No. 1. He asserts that his due process Rights were violated when the Board failed to make an impartial decision because he had filed a #602 appeal. Id. at 5.

2. Petitioner also contends that the Board erred in finding he had insufficient credibility, did not have an appropriate attitude towards the crime, had instances of serious institutional misconduct and had insufficient institutional programming, Id. at 7-12.

SEE: EXHIBITS #A-18, #A-19 and #A-20. List of over 25 years chrono's and certificates.

3. Petitioner contends in 2010 at Solano state Prison, Correctional officer (C) R. Sutter Violated 15 California Code at Constitutional and Statutory Provisions involved First Amendment Claim at Retaliation for exercise of Constitutional Right at access is cognizable under § 1983

1. Fourth Amendment

Harper V. Harris County, Tx, 21 F 3d 597 (5th Cir. 1994)

2. Fifth Amendment

Equal protection Violation

Jacobs, Visoni & Jacobs Co. V. City of Lawrence, KS,
927 F 2d 1111 (10th Cir. 1991)

3. Eighth Amendment

Estell V. Gamble, 429 US 97, 50 LEd 2d 251, 97 SCT. 285 (1976)

4. Fourteenth Amendment

De weese V. Town of Palm Beach, 812 F.2d 1365 (11th Cir. 1987)

5. Americans with Disabilities Act (ADA)

Armstrong V. Wilson, 124 F.3d 1019 (9th Cir. 1997)

Regulations (CCR) 3401, 5 Staff Sexual misconduct when correctional officer (co) Marsden sent inmate Smith to attack me however he only sexually touched my body. Afterwards c/o Marsden showed my prison records to inmate Smith which is a violation of CDCR policy this Marsden committed unethical conduct reflecting discredit on themselves or the department violating 15 CCR 3391. (a)(b)(c)-(d). See: also Chaker V. Crogan, (9th Cir. 2005) 428 F.3d. 1215.

4. Petitioner contends Sutter retaliated against him for false's flashing since today they cut petitioner life in a half.

STATEMENT OF THE CASE

APPENDIX'S LIST #A

APPENDIX.#A-1:Petitioner filed a petition for writ of HABEAS CORPUS in the Superior Court of California Los Angeles County on 12/2016 Superior Court Opinion Denied on April 11,2016

APPENDIX-#A-2:Supreme Court of California Opinion Denied 9,2016

APPENDIX-#A-3:United States Court of Appeal for the Ninth Circuit opinion denied February 22,2018

APPENDIX'S LIST #B

APPENDIX-#B-1;AND #B-2:The two medical SLIP are the last Medical Evidence that that CDCR release to petitioner after the Ninth Circuit Court of Appeal denied this case .
Petitioner asked at CMC-West on April 12,2017 for all the Medical Record they didn't Released these two Pages

APPENDIX-#B-3:These Appendix are example to show the Damage was created be the Co's Harrasment,For over six Years, When petitioner was at Solano State Prison, For Retaliation of False Accusations.

APPENDIX-#B-4:Petitioner access to the wheel chair,cane,and Mobility Vest are Permanent.This cause the Damage I have in my Heart,that is not Irreparable like the Damage Petitioner have on his heart.
Petitioner reason for Jointing the two cases which was Denied.
My Heart Medical Problem does noy let me stand up over ten Minutes,my life living now is cut in Half.

APPENDIX'S LIST #C

APPENDIX-#C-1:124P-BPH Line No.24 and #C-2:125P-BPH Line No.1 the first #C-124 Line No.24 the COMMISSIONER NEWMAN say It's not the Parole Board. We're not-Next Page No.-125 Line No.1 Conting; the one that filed the 602.

APPENDIX-#C-3:Any one has the right to appeal,but the commissione rs decision was at the break when they received the false information from Lieutenant.L.Scotland,on 7/-9/15.You can see the APPENDIX-#C-3:P-Line No.6,7,8-and 9.The Deputy Commissioner NEWMAN:Say,I suggest you don't Parole Marco.He's a troublemaker.All right,you've been accepted to Parolee Reentry Service

STATEMENT OF THE CASE

GO in San Francisco.

The Deputy commissioner NEWMAN: Had the decision to give Parole to the petitioner, before the Lieutenant came and Accused the petitioner without evidence or documents to prove I am guilty of something?

The Retaliation for petitioner claim the c/o.R, Sutter Misconduct, Co's PLOT the petitioner.

APPENDIX-#C-4P, Lines No.20-25 the petitioner explained to the Board of Parole Hearings commissioners about c/o.R. Sutter who was a victim in San QUENTIN State prison many years ago and tried to revenge with an innocent Inmate only because the petitioner had in his record false accusation from 1994 in Tehachapi where he was Physically TORTURED BY CO'S Please see:

APPENDIX-#C-5: APPENDIX-#C-5 The c/o.R. Sutter RECORD.

APPENDIX-#C-6: APPENDIX-#C-6 The BPH EVIDENCE the BOARD OF PAROLE HEARINGS accusation the petitioner of gay like the CDCR and all co's like the c/o.R. Marsden ordered to the inmate Smith to RAPE the petitioner.

APPENDIX-#D-1: On 1/2/09 Ph.D. Robert.E. examined the petitioner and Stated: Mr. Argon has never been molested or sexually abused as a child. He denied any physical or emotional abuse as a child while growing up. The petitioner never and ever sayed "While growing up" the Ph.D. Robert.E. reported is the negligent mistake to do or did intentionally was mal-practice or he failed to use responsible professional treat to his job and protect the petitioner. Also he in another page puted the petitioner was from Salvador when he is from Ecuador.

APPENDIX-#D-2: This appendix are a program focused on healing neurological trauma created through painful early childhood experiences. With the Ms.M. Smith, Ph.D. Clinical Psychologist.

STATEMENT OF THE CASE

APPENDIX'S LIST #E

- APPENDIX-#E-1: On April 17, 2014, Petitioner received a letter by the Warden E. Arnold of Solano State Prison (SSP) responding to his Complaints against CDCR/BPH for his reprisal retaliation. During six years from 2010 through January 2017 petitioner admits this Letter as evidence of proof that he tried to resolve the problem he has been having with this (CDCR/BPH members in this case) as EXHIBITS/APPENDIX'S/AFFIDAVITS/and Letters like this letter dated: April 17, 2014
- APPENDIX-#E-2: Again petitioner admits as proof of evidence his letter to the Warden E. Arnold respondent who denied his Judiciary Legal Duty Owed to the petitioner of reasonable care to protect him from Harrassment and threats and any form of reprisal from his officers the respondant he filed his complaint against.
- APPENDIX-#E-3: Petitioner acertaines that no officer at Solano State Prison not any of the respondent officers had witnessed or had first hand knowledge that the Petitioner was seen in any relationship sexually with any other prisoner for them to falsely accuse him of the kind of bad sexual acts nor giving them reason to harass him and disrespect or discriminate him thus mischaracterizing him. It was revealed to petitioner that there was gay he don't are! The confidential information in the computer at the Podium in bldg#19 at Solano State Prison as revealed by officer. R. Marsden to a inmate Smith.
- APPENDIX-#E-4: Petitioner has no way of admitting into evidence the confidential information that inaccurately mischaracterizes him revealed to the inmate Smith by officer. R. Marsden except to call the staff Smith as a witness for the full record of this inaccurate information about him being gay or by the comts Subpoena duce tecum the confidential information documents prison officials have of him in there record

STATEMENT OF THE CASE

APPENDIX-#E-5:Petitioner ascertains that he was denied his appeal grievance letter at the third level review by the Director of CDCR which was against the respondent officer R.Marsden and the Warden E.Arnold for failing to protect the petitioner from disrespect and harrassments and false accusations without any supporting evidence to slander his character in the above case.

APPENDIX-#E-6:Petitioner admits two affidavits he sent previously
APPENDIX-#E-7:to this Court requesting that the Court Subpoena duce tecum the names of the officers and staff and subpoena each officer that may provide testimony of the record of confidential information used against him that slanders him at all times alleged in this case.

APPENDIX'S LIST #F

APPENDIX-#F-1:Petitioner admits that he filed an ADA reasonable accommodation request on CDCR 1824 form log:No.DVI-X-18-00631 alleged herein above complaining that he needed a Testicle Magnetic Resonance Impression which was denied by the Chief Medical Staff M.D.C.Barber dated: 1/3/18-attached as exhibit

APPENDIX-#F-2:Petitioner request the review Court to Subpoena duce tecum records of all requests of his Medical records including the MRI done on February 26,2018 of response by the MRI specialist and the M.D.Hla Win. of his examination and treatment of the Petitioners Medical Problems..

REASONS FOR GRANTING THE PETITION

The Petitioner presenting the; REASONS FOR GRANTING THE CASE

The Statement of the case Pages: No. #1, No. #2 and No. #3

The Petitioner Explaining the case Page's: No. #1, No. #2 and No. #3

The defendants Lawyers never answer the Petitioner MOTION for MEDICAL EXAMINATIONS they AVOID the litigation. !

The Lawyers defendants and both's case denied the Joinder the two case, they denied MOTION to Discovery, they denied MOTION to MEDICAL EXAMINATIONS in the case of the TORTURE who I been 23 years on pain reason I trying to take the (MRI) by the MAGNETIC RESONANCE IMAGING, Dear, the case; No. 1:17-cv-00875-DAD-MJS (PC) this case are for the TORTURE and this case No. 2:16-cv-02826-WBS AC-P who's the co's from the CDCR HARASSMENT THE PETITIONER FOR OVER SIX YEARS ! Dear, on the case of the TORTURE PHYSICAL I HAVE DAMAGES IRREPARABLE I BEEN ON PAIN FOR OVER 23 YEARS.

Dear Clerk, I will be sent the other case when he will be ready, if the court will be order the Joinder both's case but now is late because I try to suit them together for 23 years of harassment for all damages they created to the petitioner, I SPEAKING ABOUT THE DAMAGES IMREPABLE I HAVING !

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

Dated: March 17, 2018

Respectful

Sign: Francisco Argon
Francisco Argon, E-73850 I/m in p
Pro Se

VIOLATIONS PETITIONER PRESENTED

1 On 2010 the c/o.R.Sutter stared to take revenge on the petitioner
2 Francisco Argon,E-73850,after he saw the plaintiff's record on
3 bldg#24 D-Yard in Solano State Prison (Record from Tehachapi Sta-
4 te Prison about planing to kill c/o.T.Moore this case was "Fabri-
5 cated" Another inmate planed to kill him in San Quentin State Pri-
6 son.)

7 Ather the investigation for the Captain.T.Wamble and the assist-
8 ent of warden Ms.K.Young the petitioner was inocent,the barrier
9 from the shower cover the inmate's.

10 This finding only angered c/o.R.Sutter further and he CONVINCED
11 HIS COLLEGUES TO HARASS AND TERRORISE THE PLAINTIFF.Those correc-
12 tional officers names are.Lt.L.Scotland,CCI.R.Rivas,c/o.T.Webster
13 c/o.R.Marsden,Lt.Derncourt,A.W..G.Mattason,and off the General Fa-
14 cility,Warden E.Arnold,BPH Commissioners Cynthia Fritz Presiding
15 Commissioner,and Deputy Commissioner Katheen Newman,and a I/m T.-
16 Smith.

17 Because I have no idea what the co's are Going to do to me Next
18 Day,Week,Month,or At Any Time.!

19 The Plaintiff lived like this for over six years.Defendants Accu-
20 sed plaintiff with false Complaint,false #602 they are responsi-
21 ble for creating all these Medical Problems to the plaintiff.

22 The false Accusation,the Retaliation,the Harassment,the Stress In
23 for six years the eating Disorder and the Grease stoped the circ-
24 ulation of the Blood,who caused the Coronary Infartion in the le-
25 ads in the vain in the Heart to be Dead and cut half of the Plai-
26 tiff's Life to Live.

27 This cdcr and BPH workers VIOLATED ALL THIS AMENDMENTS CONSTITUT-
28 IONAL RIGHTS

TABLE OF AUTHORITIES CITED

DEFENDANT'S AMENDMENT'S
VIOLATION

1 Plaintiff alleges defendant R.Sutter, exhibited deliberate Indiff-
2 erence when he maliciously made false accusations against the pla
3 intiff and swore them, to be true knowing the harm of such charges
4 would do to the plaintiff's reputation and character, thus inflic-
5 ting sadistic treatment which resulted in phisical sexual attack
6 on the plaintiff.

7 see: (Hudson, V. McMillan, 503 U.S.1, 6-7; see: also Farmer V. Brennan, 511
8 U.S. 825 recklessness leading to harm.) "Bad motives of attitudes
9 harbored by prison personel: see: Halley V. Gross, 86 F.3d 630, 642 (7
10 th Cir. 1996) and Velez V. Johnson, 395 F.3d 732, 736 (7th Cir. 2005).

11 Plaintiff alleges Defendant R.Sutter, also committed sexual harass-
12 ment towards plaintiff when he seat in the shower podium in or-
13 der to enhance his view of the plaintiff while he (plaintiff) sho
14 werd he did this with the intention of sexual gratification see;-
15 (Smith V. Cochran, 339 F.3d 1212-13 (10th Cir. 2003) Eighth Amendment
16 Violation to the U.S. Costitution.

17 Plaintiff alleges exhibited Defendant L.Scotland, Deliberate Indi-
18 fference. When Scotland harassed and bullied the plaintiff and cre
19 ated a hostile atphere where he directed other officers who work-
20 ed under him perpetrated cruel acts against the plaintiff with
21 Lt.Scotland's approval.

22 These acts by L.Scotland were carried out sadistically and malic-
23 iously with the intent to cause harm and injury to plaintiff. see:
24 (Hudson V. McMillan, 503 U.S.1, 6-7.) also Farmer V. Brennan, 511 U.S.-
25 825:

26 Defendant L.Scotland : Directed correctional staff to compiled fal
27 se evidence against the plaintiff, which he presented to the comm-
28 issioners at the plaintiff's Parole Suitability Hearing, causing

1 the panel to find plaintiff unsuitable for parole.see:(Wolff V.-
2 McDonnell,418 U.S.539,556-58.) Scotland defendant also interfered
3 with the plaintiff's transfer in retaliation for plaintiff filing
4 an administrative appeal 1st and 8th Amendment Violation to the
5 U.S. Constitution.

6 Plaintiff alleges Defendant E.Arnold: purposefully interfered with
7 th the plaintiff's 5th Amendment right to access to the courts.the
8 a acts or amissions perpetrated by this defendant delayed,hinder-
9 ed and impered plaintiff's attempt to pursue legal action,in court
10 see:(John V.Adams,969 F.2d 228,235 (6th Cir.1992);see also Simkins
11 V.Bruce,406 F.3d 1239-1242-43 (10th Cir.2005).This intentional in
12 terference was committed with the specific intent to block plain-
13 tiff's constitutionally guaranteed right to petition the governm-
14 ent for a redress of his grievances.see:(Hoskins V.Lenear,395 F.-
15 3d 372,375 (7th Cir.2005):Prisoners are entitled to use available
16 grievance procedures without treat of retaliation.

17 These actions of defendant Scotland was committed with malice and
18 forethought which served nor advance any penological goal.(42 U.
19 S.C.§1983.) First Amendment Violation.

20 Plaintiff alleges Defendant C.Fritz:Committed an act which severe-
21 ly jeopardized plaintiff's protected liberty interest,in violation
22 of The 1st Amendment's guarantee when he received and accepted
23 confidential evidence from unqualified person during a break in
24 the plaintiff's Parole Hearing which was used to form a basis for
25 denying plaintiff a parole suitability.see:(Wolff V.McDonnell,418
26 u.s. 539,556-58.) 14th Amendment Violation.

27 Plaintiff alleges Defendant G.Mattason:Directed (Lt.L.Scotland)in
28 tervene in the Board of Parole Hearing with extrinsic evidence to

1 sabotage plaintiff's chances at receiving parole suitability. This
2 was done in retaliation and meant to punish the plaintiff for re-
3 porting defendants staff misconduct. see: (Siggers-El V. Barlow, 412
4 F.3d 693 (6th Cir. 2005)) (Hoskins V. Leneer, 395 F.3d 372, 375 (7th Cir
5 2005)). First Amendment Violation.

6 Plaintiff alleges Defendant Denercourt: Had a conspiratorial relation
7 ship with Associate warden G. Mattason to hinder the plaintiff's
8 right to petition the Government for a redress of his grievances,
9 (Hoskins V. Leneer, 395 F.3d 372, 375 (7th Cir. 2005)).

10 Defendant Denercourt also was involved in an act to sabotage plai-
11 ntiff's chances at receiving parole. see: Wolff V. McDonnell, 418 U.S
12 539.) First Amendment Violation.

13 Plaintiff alleges Defendant R.E. Record: Misstating and misreprese
14 nted the plaintiff's verbal responses during the psych. hearing, de
15 fendant record violation plaintiff's 5th Amendment right.

16 The Parole Board Commissioners receive the psychologist's record
17 reports and use them to either grant or deny parole. This defendan-
18 nt is aware of this fact yet misstated plaintiff's responses!

19 On page 93 EXHIBIT#B-93 Line N=15-16 he say: He denied any physical
20 as a child, while growing up ! IF I DENIED HOW I CAN SAY THIS ?
21 see: (Holff V. McDonnell, 418 U.S. 539.) see: also Hodson V. McMillan, -
22 503 U.S. 1, 6-7: 14th Amendment Violation.

23 Plaintiff alleges Defendant T. Wamble: Participated with defendants
24 failing to investigating plaintiff's complaints in his administr-
25 ative appeal. This constitutes a violation of the plaintiff's rig-
26 ht to access to the court. see: (Christopher V. Harbury, 536 U.S. 405,
27 414.)

1 defendant T.Wamble acts constitute deliberate indifference to the
2 plaintiff's constitutionally protected rights:see:(Hudson V.Mc-
3 Millan,503 U.S.1.) Due Process clause 5th Amendment Violation.

4 Plaintiff alleges Defendant K.Young:Interfered with plaintiff's
5 right to file an appeal in the U.S.District Courts.She failed to
6 report alleges committed by officers crimes to the proper autho-
7 rities.see:(Christopher V.Harburry,536 U.S.403,414.)see:Farmer-
8 V.Brennan,511 U.S.825.)Due Process Violation 1st and 5th Amend-
9 ment Violation.

10 Plaintiff alleges Defendant R.Rivas:Inflicted mental as well phy-
11 sical pain and suffering on the plaintiff when he conspired with
12 defendant Scotland and cancelled the plaintiff's transfer that
13 had been agreed upon by plaintiff and his counselor.This act con-
14 stitutes deliberate indifference,see:Velez V.Johnson,395 F.3d 732
15 736,(7th Cir.2005).) 5th Amendment Violation.

16 Plaintiff alleges Defendant T.Webster:Went beyond his legal duty
17 when he openly and routinely watched the plaintiff shower in a se-
18 xual way that made plaintiff nervous and fearful for his safety.
19 In order to view plaintiff naked in the shower defendant Webster
20 lowered the privacy barrier.see:(Flait V.North American Watch Co-
21 rp.,3 Cal.App.4th 467:see:Civil Rights Act of 1964,§2000e-2 (a)-
22 (1):Ellison V.Brady,924 F.2d 872(9th Cir.1991):8th Amendment Vi-
23 olation.

24 Plaintiff alleges Defendant R.Marsden:Committed crime of sexual
25 assault/attempted rape,on the plaintiff.R.Marsden "an inmate to-
26 attack and rape the plaintiff,After the discredited flashing all-
27 egations failed,defendant R.Marsden revenge towards the plaintiff
28 by commanding a known sexual predator(defendant T.Smith) to "get"

1 the plaintiff, telling smith that the plaintiff was "gay" and would
2 be easy prey. see: Smith V. Cochran, 339 F.3d 1205, 1212-13 (10th-
3 Cir. 2003): 8th Amendment Violation.

4 Plaintiff alleges Defendant T. Smith: Acted on the command given
5 by R. Marsden to attack the plaintiff with the intention to rape
6 him. Plaintiff feared for his safety and life causing injury of
7 actual rape. see: (PC §261 (a)(2); People V. Iniguez, 7 Cal. 4th 847;)
8 8th Amendment Violation.

9 Plaintiff alleges Defendant Cathleen Newman: Allowed the Board of-
10 Parole Hearing (BPH) to be tainted by unverified, unproven docu-
11 mentary evidence prejudicial to the plaintiff. Between pages N:124,-
12 EXHIBIT#B-124. Line N:24 say: It's not the Parole Board. We're not/-
13 continuing on page N:125 EXHIBIT#B-125 Line N:1 the second part -
14 of the sentence said: the one that filed the 602. Where the # 602 -
15 copy are don't exist, cause the plaintiff never filed to the Paro-
16 le Board Hearing (ONE) !

17 Which was used to deny the plaintiff parole. see: (Wolff V. Donnell,
18 418 U.S. 539, 556-58.) This act stemmed from the plaintiff's choice
19 to exercise his constitutionally protected right to seek redress
20 for wrongs committed against him, in violation of the 1st Amendm-
21 ent to the U.S. Constitution. see: (Siggers-El V. Barlow, 412 F.3d 693
+ 22 (6th Cir. 2005).) 14th Amendment Violation.

1 All defendants acted with deliberate indifference, and did so with
2 malice; As they cared not whether the plaintiff suffered at the
3 hands of his abusers. All defendant's actions neither served, nor
4 did they further, any penological interest or goal. All defendant's
5 actions violated plaintiff's protected liberty interest and
6 right to file for redress without fear of reprisal or retaliation
7 It should also be noted that of the overt as well as covert acts
8 of these 14 defendants we committed with such malice as to consti-
9 tute cruel and unusual punishment, in violation of the 8th Amend-
10 ment (Wilson V. Seiter, 501 U.S. 294, 297-303: 8th Amendment prohibits
11 only "cruel and unusual punishment, and the infliction of punish-
12 ment is a deliberate act intended to chastice or delay.)

13
14
15
16
17 I DECLARE UNDER PENALTY OF PERJURY THAT THE STATEMENTS ARE
18 ABOVE ARE TRUTHFUL AND CORRECT !
19
20

21 Dated: 12/23/2017
22

23 Respectful

24
25 Sign: Francisco Argon
26 Francisco Argon, E-73850 I/m in
27 Pro Se
28

DEFENDANT'S AMENDMENTS VIOLATION
BY EXHIBITS

1 Plaintiff's present c/o.R.Sutter:EXHIBITS# Violations Rights

2 EXHIBIT#A-70,EXHIBIT#A-71,EXHIBIT#A-72,EXHIBIT#A-87,EXHIBIT#E-8,-
3 EXHIBIT#E-9 and EXHIBIT#E-10,and EXHIBIT#C-1.

4
5 Plaintiff's present all EXHIBITS# TO this defendants and also are
6 aplaying for the c/o.R.Sutter who are the responsible.

7 Transfer retention,Lt.L.Scotland.EXHIBIT#A-70,EXHIBIT#A-71,EXHIBIT#
8 BIT#A-72,EXHIBIT#A-87,EXHIBIT#E-8,EXHIBIT#E-9 and EXHIBIT#E-10

9
10 Plaintiff's presentation,c/o.T.Webster,planted new evidence on
11 February 03,2015 EXHIBIT#A-88,also EXHIBIT#E-9 and EXHIBIT#E-10

12
13 Plaintiff's presentation:c/o.R.Marsden,EXHIBIT#E-9,EXHIBIT#E-10
14 EXHIBIT#E-11,EXHIBIT#E-12,EXHIBIT#E-13,EXHIBIT#E-14,EXHIBIT#E-15
15 EXHIBIT#E-16,EXHIBIT#E-17,EXHIBIT#E-18,EXHIBIT#E-19,EXHIBIT#E-20
16 EXHIBIT#E-21,EXHIBIT#E-22,EXHIBIT#E-23,EXHIBIT#E-24,EXHIBIT#E-25
17 and EXHIBIT#E-26. Affidavits,Declarations,and Third Level #602.

18
19 Plaintiff's presentation:Warden.E.Arnold,EXHIBITS#E-1,EXHIBIT#E-2
20 EXHIBIT#E-3,EXHIBIT#E-4 and EXHIBIT#E-5 Letter's petitioner tryed
21 to resolver the problem.

22
23 Plaintiff's presentation:Lt.Derncourt,are responsible for all the
24 those rule violation her pot with A.W.G.Matteson and Lt.L.Scotland
25 nd to give to the bph commissioners false information without one
26 evidence.

1 Plaintiff's presentation:A.W.G.Mattason,are responsible for all
2 those rule violation her plot with Lt.Derncourt and Lt.L.Scotland
3 to give the BPH commissioners false information without one evid-
4 ence.

5
6 Plaintiff's presentation:Presiding commissioner Cynthia Fritz,who
7 received false information without documentation from the Lt.L.-
8 Scotland on July 9,2015 at 1:37 hours,about the false complaint
9 and false #602 who the petitioner never wried;see:EXHIBITS#B-93-
10 line N.12-17,EXHIBIT#B-70,Line N.19 also EXHIBITS#B-124-Line N.24
11 and EXHIBIT#B-125-Line N.1.

12
13 Plaintiff's presentation:Deputy commissioner Kathleen Newman,who
14 received false information without documentation from the Lt.L.-
15 Scotland on July 9,2015 at 1:37 hours,about the false complaint
16 and false #602 who the petitioner never wried;see:EXHIBITB-93-
17 line N.12-17,EXHIBIT#B-70,Line N!19 also EXHIBITS#B-124-Line N.24
18 and EXHIBIT#B-125-Line N.1.

19
20 Plaintiff's presentation:Dr.E.Record for the risk assessment to
21 the BPH on 2008-9 in Vacaville State Prison Medical Facility,who
22 SPECULATION with the report to the Board of Parole Hearing in his
23 report dated on 12/31/2008 see:THE REPORT EXHIBIT#Page N.3 he lie
24 about something I never told him

25
26 Plaintiff's presentation:CCI-R.Rivas plot with Lt.L.Scotland to
27 stoped the transfer for the plaintiff Francisco Argon,E-73850 on
28

1 two occasions see:EXHIBITS#A-70,EXHIBIT#A-71 and EXHIBIT#A-73

2
3 Plaintiff's presentation:I/m.T.Smith who was planed with the c/o.-
4 R.Marsden to rape the plaintiff,this two defendants agree to
5 do that after both's saw the plaintiff's record by the computer
6 and the c/o.R.Marsden give the directtorder to the I/m.T.Smith
7 EXHIBITS#E-9,EXHIBIT#E-10,EXHIBIT#E-11,EXHIBIT#E-12,EXHIBIT#E-13
8 EXHIBIT#E-14,EXHIBIT#E-15,EXHIBIT#E-16,EXHIBIT#E-17,EXHIBIT#E-18
9 EXHIBIT#E-19,EXHIBIT#E-20,EXHIBIT#E-21,EXHIBIT#E-22,EXHIBIT#E-23
10 EXHIBIT#E-24,EXHIBIT#E-25 and EXHIBIT#E-26

11
12 Plaintiff's presentation:Defendant T.Wamble having the same resp-
13 onsability like the Assistent Warden K.M.Young and the Warden E.-
14 Arnold.

15 SEE:EXHIBITS#A-70,EXHIBIT#A-71,EXHIBIT#A-72,EXHIBIT#E-6 and also
16 EXHIBIT#E-7

17
18 Plaintiff's presentation:Defendant K.M.Young Having the same resp
19 onsability like the Warden E.Arnold.

20 SEE:EXHIBITS#A-70,EXHIBIT#A-71 and EXHIBIT#A-72.
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REASONS FOR GRANTING THE PETITION

1 To the Honorable Court Supreme of the Stated Unites,I am
2 the petitioner Francisco Argon,E-73850 a inmate who suffered and
3 continuing to suffering Harrasment for the CDCR/BPH I been suffer
4 ed many medical problems who's The petitioner describe in the ca-
5 se during over six years for the Defendants a presented here in
6 this complaint they all violated all rules the petitioner suffer
7 ed and one of the most damage he having suffered and continuing t
8 to suffering,cause the damage are Inreparable Damages.

9 Pétitioner presented here all evidences the Defendants violated b
10 by his abuse of power they having they did,for that I have been in
11 ing for the rest of my life to living half life,cause the medical
12 problem of Myocardial Infarction and the physical and mental !

13 A preliminary and permanent injunction ordering defendants
14 E.Arnold,Warden;Lt.L.Scotland;G.Mattason,(Asst.Warden);Lt.Derncoe
15 urt;c/o.T.Webster;c/o.R.Marsden;c/o.R.Sutter;CC-I R.Rivas;Inmate
16 T.Smith;Dr.R.E.Record,Ph.D;Cynthia Fritz,Presiding Commissioner;S
17 Cathleen Newman,Deputy Commissioner,to pay monetary damages for
18 the willful acts committed against the Pétitioner Francisco Argon-
19 E-73850:

20 Compensatory damages in the amount of \$140.00 a day for pain and
21 suffering inflicted upon the Petitioner by defendants in the form
22 of sexual harasment by State Employees for the time span covering
23 2010-2017 and also for the thre years denial from the BPH (7-9-15
24 7-9-18): Any additional relief this Court deems,proper,and equita
25 ble

26
27 Dated: 5/03/18

Sign: Francisco Argon

Francisco Argon,E-73850 I/m in
Pro Se

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Francisco Aragon
Date: 3/17/18