

No. 17-999

In The
Supreme Court of the United States

BEVERLY JACKSON,

Petitioner,

v.

STATE OF CONNECTICUT
DEPARTMENT OF HEALTH, et al.,

Respondents.

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

PETITION FOR REHEARING

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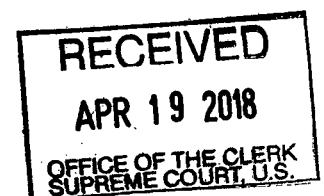


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PETITION FOR REHEARING

Beverly Jackson the Petitioner in this proceeding, respectfully petitions for rehearing of the order of the United States Supreme Court, entered on March 26, 2018, denying the petition for writ of certiorari to review the decision of the Second Circuit Court of Appeals. The basis for rehearing is that there exist substantial grounds not previously presented to have the petition for writ of certiorari granted. This request is guided by the criteria in Rule 10(c), which provides that the granting of a petition for writ of certiorari may be appropriate if a United States Court of Appeals decided an important question of federal law that conflicts with relevant decisions of this Court. Petitioner considers this guiding criterion in the context of Rule 44.2, which requires an articulation of “substantial grounds not previously presented.”

Petitioner requests review of the lower court’s judgement for constitutional violations. The judgment of the Second Circuit Court of Appeals is deeply troubling and leaves no doubt that it contravenes the Constitution of the United States. The Court presented a bizarre and objectionable decision on the central issue of dispute holding that the state has the right to interfere in religious affairs. The opinion of the Court contravenes the fundamental concept of liberty embodied in the Fourteenth Amendment that embraces the liberties guaranteed by the First Amendment pursuant to 42 U.S.C. § 1983. (Complaint Doc. 1 § 28, 3:15cv00750 CSH). The Court should grant review because the judgment of the Second Circuit Court of Appeals is

extraordinarily in conflict with relevant decisions of this Court. In *Cantwell* this court held:

“The First Amendment declares that Congress shall make no law respecting an establishment of religion or prohibiting the free exercise thereof. The Fourteenth Amendment has rendered the legislatures of the states as incompetent as Congress to enact such laws. The enactment by a State of any law respecting an establishment of religion or prohibiting the free exercise thereof is forbidden by the Fourteenth Amendment. The fundamental concept of liberty embodied in the Fourteenth Amendment embraces the liberties guaranteed by the First Amendment.” *Cantwell v. State of Connecticut*, 310 U.S. 296 (1940).

The Second Circuit Court of Appeals has made the Supreme Court’s ruling in *Cantwell* of nil effect by ruling that the state has the right to interfere in the affairs of a religious entity. The opinion of the Second Circuit Court of Appeals is unconstitutional because it contravenes this Court’s decision in *Cantwell*. In *Cantwell* this court held, “Freedom of conscience and freedom to adhere to such religious organization or form of worship as the individual may choose cannot be restricted by law.” The opinion of the Second Circuit Court of Appeals contravenes this court’s ruling because it restricts freedom of conscience to engage in the form of worship of choice. The ruling of the Second Circuit Court of Appeals is unconstitutional because it held that the state can interfere in the affairs of a religious entity by revoking the license, which the

religious organization, acting under the authority of 15 U.S.C. § 1064 of the Trademark Act, granted petitioner to practice the tenets of her religion in the healing arts as a Doctor of Nedicine®.

The United States Court of Appeals decided an important question of federal law that conflicts with this Court's decision in *Everson*. In *Everson* the Court held, "Neither a state nor the Federal Government can, openly or secretly, participate in the affairs of any religious organizations or groups and vice versa." *Everson v. Board of Education*, 330 U.S. 1 (1947). Petitioner believes her religion is not subject to the scrutiny of an impious Department that forces people to submit to their devilish medicine because they cannot distinguish between good and evil. "Those who are spiritual discern all things and they are themselves subject to no one else's scrutiny." *I Corinthians 2:15*, KJV. Petitioner's healing rites as an Ordained Christian Minister ("OCM") is subject only to divine scrutiny. The Respondents violated Petitioner's constitutional right of religious freedom by openly interfering in the affairs of her religion. Conn. Gen. Stat. § 20-9 explicitly states: "No person shall . . ." and does not state "No temple shall . . ." this implies that temples are exempt from this law. The Bible says: I am the temple of the Holy Spirit. *I Corinthians 6:19*, KJV.

The Court should grant review since justice has not been served because the Respondents persistently distorted the truth to bring a web of entanglement to misrepresent Petitioner's character to get the Court to revoke oral arguments so their deceitfulness would not be exposed. Petitioner was prejudiced because the

Respondents alleged that Petitioner "filed the lawsuit in the District Court in an attempt to stop the Connecticut Department of Public Health from prosecuting charges against her". Petitioner actually filed the lawsuit to preserve her constitutional right to practice the creeds of her religion under the federal trademark Doctor of Nedicine®. The United States Supreme Court ruled in *Everson* that the state does not have the right to interfere in religious affairs. In the aftermath of the prosecution, the medical board issued Petitioner an order to Cease and Desist engaging in the unlicensed practice of medicine. The problem with the Cease and Desist order is that it is an order requiring Petitioner to stop practicing her religion under the guise of an order to Cease and Desist engaging in the practice of medicine. The Cease and Desist order is an affront to the authority of the United States government in authorizing the trademark Doctor of Nedicine®.

Petitioner has never and will never engage in the unlicensed practice of medicine. In fact, Petitioner vehemently opposes the practice of medicine because prescription drugs are seeds of death. Petitioner is appalled that they would even suggest that she practiced medicine even after the witnesses testified to the contrary. (Doc.36-3 and Doc.36-4). The United States Court of Appeals believed their lies because they expected these dishonorable state officials to be honorable. In fact, the Connecticut Department of Public Health has no legal basis to restrict any form of worship as this Court stated in *Cantwell* and because state law did not grant them powers and duties over

members of any temple that does not use or prescribe in their practice any poisonous drugs or surgery.

The Second Circuit Court revoked the oral arguments granted to Petitioner because the AAG told the Court "that the questions raised in this appeal are so insubstantial as not to require further argument." (App. Doc 54.2). Petitioner believes the questions raised in the appeal are substantial because her problem has not been resolved and is still affecting her life. The question will become insubstantial only after Petitioner's inalienable right to worship according to the dictates of her heart has been restored. The Respondents believe they are above God. The AAG made calumnious declarations to the Court that, "Ms. Jackson is diagnosing and treating individuals within Connecticut through her practice of Nedicine. Ms. Jackson trademarked Doctor of Nedicine, and her lawsuit is based on the claim that her trademark authorizes her to treat and diagnose Connecticut residents." (App. Doc 54-2). There are 12 states whose law shows that alternative medicine is not medicine. New Mexico Unlicensed Health Care Practice Act § 2B(16), provides undeniable evidence that a functional diagnosis is not the practice of medicine because it is non-diagnostic. New Mexico Unlicensed Health Care Practice Act § 4F provides compelling evidence that an alternative medical prescription is not the practice of medicine because it is a non-prescription. Nevada, Colorado, Arizona, Louisiana, Rhode Island, South Dakota, California, Minnesota, Oklahoma, Florida, and Idaho concur with New Mexico. Certainly, the Respondents are not

ignorant of these truths. Respondents deliberately deceived the Court in order to illegally control the affairs of a religious organization and its members.

New Mexico

Unlicensed Health Care Practice Act

"AN ACT RELATING TO HEALTH CARE; ENACTING THE UNLICENSED HEALTH CARE PRACTICE ACT; PROVIDING PENALTIES.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF NEW MEXICO:

Section 1. SHORT TITLE.

This act may be cited as the "Unlicensed Health Care Practice Act".

Section 2. DEFINITIONS.

As used in the Unlicensed Health Care Practice Act:

- A. "complementary and alternative health care practitioner" means an individual who provides complementary and alternative health care services;
- B. "complementary and alternative health care service" means the broad domain of complementary and alternative healing methods and treatments including:
 - (1) anthroposophy;
 - (2) aromatherapy;

- (3) ayurveda;
- (4) culturally traditional healing practices, including practices by a curandera, sobadora, partera, medica and arbolaira, and healing traditions, including plant medicines and foods, prayer, ceremony and song;
- (5) detoxification practices and therapies;
- (6) energetic healing;
- (7) folk practices;
- (8) Gerson therapy and colostrum therapy;
- (9) healing practices utilizing food, dietary supplements, nutrients and the physical forces of heat, cold, water, touch and light;
- (10) healing touch;
- (11) herbology or herbalism;
- (12) homeopathy;
- (13) meditation;
- (14) mind-body healing practices;
- (15) naturopathy;
- (16) nondiagnostic iridology;
- (17) noninvasive instrumentalities;

- (18) polarity therapy; and
- (19) holistic kinesiology and other muscle testing techniques;
- C. "controlled substance" means a drug or substance listed in Schedules I through V of the Controlled Substances Act or rules adopted pursuant to that act;
- D. "conventional medical diagnosis" means A medical term that is commonly used and understood in conventional western medicine;
- E. "dangerous drug" means a drug that is required by an applicable federal or state law or rule to be dispensed pursuant to a prescription; that is restricted to use by licensed practitioners; or that is required by federal law to be labeled with any of the following statements prior to being dispensed or delivered:
 - (1) "Caution: federal law prohibits dispensing without prescription.";
 - (2) "Caution: federal law restricts this drug to use by or on the order of a licensed veterinarian."; or
 - (3) "Rx only";
- F. "department" means the regulation and Licensing department;
- G. "health care practitioner" means an individual who provides health care services;

- H. "health care service" means any service relating to the physical and mental health and wellness of an individual; and

Section 3. LICENSING EXEMPTION.

A complementary and alternative health care practitioner who is not licensed, certified or registered in New Mexico as a health care practitioner shall not be in violation of any licensing law relating to health care services pursuant to Chapter 61 NMSA 1978 unless that individual:

- A. engages in any activity prohibited in Section 4 of the Unlicensed Health Care Practice Act; or
- B. fails to fulfill the duties set forth in Section 5 of the Unlicensed Health Care Practice Act.

Section 4. PROHIBITED ACTS.

A complementary and alternative health care practitioner shall not:

- A. perform surgery on an individual;
- B. set fractures on an individual;
- C. administer x-ray radiation to an individual;
- D. prescribe or dispense dangerous drugs or controlled substances to an individual;
- E. directly manipulate the joints or spine of an individual;

- F. physically invade the body except for the use of non-prescription topical creams, oils, salves, ointments, tinctures or any other preparations that may penetrate the skin without causing harm;
- G. make a recommendation to discontinue current medical treatment prescribed by a licensed health care practitioner;
- H. make a specific conventional medical diagnosis;
- K. illegally use dangerous drugs or controlled Substances . . . ”

Petitioner now turns this Court's attention to the undeniable evidence that medicine is a crime against humanity. We need only to look at the list below of all the people whose lives have been claimed in the medical holocaust to know the destructive effects of Western medicine. Even people who take a drug for their maladies with good intentions can end up as a drug addict due to the addictive effects of prescription drugs. According to the Journal of the American Medical Association, two-hundred and ninety people in the United States are killed by prescription drugs every day. *The Journal of the American Medical Association* (JAMA) Vol. 284, No. 4, Starfield, B. (2000). "Prescription drugs taken as directed kill 100,000 Americans a year." *Alternet*, Prescription drugs (2010). Over a period of one hundred years that would be 10,000,000 people killed in the United States plus all the people killed worldwide in this century long genocide. The medical holocaust is a far more pervasive genocide than

Hitler's holocaust; it is the axis of evil. Instead of Petitioner, they will be the ones to face charges in the tribunal of Heaven for their crimes against humanity.

Vioxx, a Jim Jones rheumatoid arthritis potion, caused the deaths of more than 60,000 people. An Australian court held Merck liable for the heart attack suffered by a patient using the painkiller Vioxx. The medical board owes Petitioner an apology for their libelous accusations in the media that she is part of the medical mafia and their accomplice in annihilating millions under the guise of medicine. It is an offense to Petitioner's good and clean conscience. Assuredly, all the partakers in this crime against humanity will not be exonerated in the judgement now taking place in the heavenly Court to judge the world in preparation for Jesus' soon return.



Marilyn Monroe, Actress

Date: August 5, 1962

Age: 36

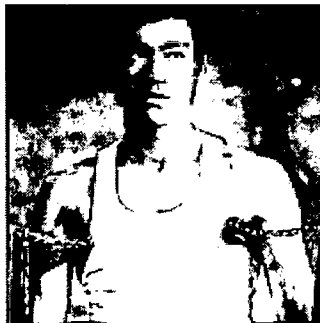
Drugs: Pentobarbital (AKA Nembutal) and chloral hydrate (sleeping pills).



Dorothy Dandridge, Actress
Date: September 8, 1965
Age: 42
Drug: Imipramine, AKA
Tofranil (antidepressant).



Jimi Hendrix, Guitarist
Age: 27
Date: September 18, 1970
Drug: Secobarbital, AKA
Seconal (sleeping pill).



Bruce Lee, Martial artist
Age: 32
Date: July 20, 1973
Drug: Equagesic (painkiller).



Freddie Prinze, Comedian
Age: 22
Date: January 29, 1977
Drug: Methaqualone, AKA
Quaaludes (sedative).



Elvis Presley, King of Rock

Age: 42

Date: August 16, 1977

Drugs: As many as 14 different drugs, including codeine (painkiller) and methaqualone (sedative).



Keith Moon, Drummer

Age: 32

Date: September 7, 1978

Drug: Clomethiazole, AKA Heminevrin (sedative).



Michael Jackson,

King of Pop

Age: 50

Date: June 25, 2009

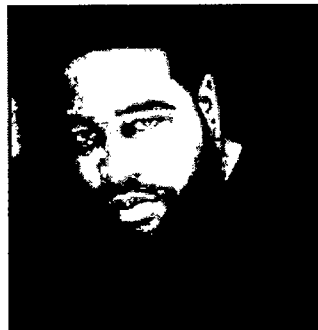
Drugs: Propofol (sedative)
Benzodiazepine (anti-anxiety).



Margaux Hemingway,
Model and Actress
Age: 42
Date: July 1, 1996
Drug: Phenobarbital (anti-seizure sedative).



Dana Plato, Actress
Age: 34
Date: May 8, 1999
Drugs: Carisoprodol, AKA
Soma (muscle relaxant),
Vicodin (painkiller)



Gerald Levert, Singer
Age: 40
Date: November 10, 2006
Drugs: Vicodin, Dextro-propoxyphene (AKA
Darvocet), sedative/anxiety
medication alprazolam (AKA
Xanax).



Heath Ledger,
 Australian Actor
 Age: 28
 Date: February 6, 2008
 Drugs: Painkillers Oxycodone
 and hydrocodone, Sedatives
 diazepam (AKA Valium),
 alprazolam (AKA Xanax)
 and doxylamine.

Dr. David Healy's Exposé of Medicine

Dr. David Healy is an internationally respected psychiatrist, psychopharmacologist, scientist, and author. He is a professor of Psychiatry in Wales, who studied medicine in Dublin, and at Cambridge University. He is a former Secretary of the British Association for Psychopharmacology, and has authored more than 200 peer-reviewed articles, 200 other pieces, and 20 books, including *The Antidepressant Era* and *The Creation of Psychopharmacology* from Harvard University Press, *The Psychopharmacologists Volumes 1-3* and *Let Them Eat Prozac* from New York University Press, and *Mania* from Johns Hopkins University Press. David's latest book, *Pharmageddon*, documents the riveting and terrifying story of how pharmaceutical companies have hijacked healthcare in America and the life-threatening results. David's main areas of research are clinical trials in psychopharmacology, the history of psychopharmacology, and the impact of both trials and psychotropic drugs on our culture. He has been involved as an expert witness in homicide and suicide

trials involving psychotropic drugs, and in bringing problems with these drugs to the attention of American and British regulators, as well raising awareness of how pharmaceutical companies sell drugs by marketing diseases. A person who commits a school shooting is usually regarded as the perpetrator, but this may be a mistake, according to Dr. Healy, world-renowned psychiatrist and psycho-pharmacologist.

Dr. Healy has acted as an expert witness in high-profile trials where violent acts and prescription drugs were linked and says the school shooter is often the victim too – the victim of a prescription drug. About 90 per cent of school shooters in North America and Europe were being treated with a prescription drug, according to Dr. Healy, usually an antidepressant or mood stabilizer. For as many as one in five people, these drugs can “make you more anxious and more agitated.” This includes developing thoughts of harming yourself or others. Critics often argue that untreated mental illness is the cause of these violent acts, but this isn’t the case, according to Dr. Healy. “Almost all of them are on treatment.” Dr. Healy says the public doesn’t hear about the connection between prescription drugs and violent events, such as school shootings, because “regulators look for any other possible reason why this could have happened.” “They will not blame the drug. Nor will the [pharmaceutical] company, nor will any of the academics that are linked to the company . . . but we have compelling evidence that these drugs can cause the problem.” www.risk.org



CONCLUSION

The petition for writ of certiorari should be granted because the opinion of the Second Circuit Court of Appeals conflicts with relevant decisions of this court. Petitioner is in the same predicament Sha'drach, Me'shack and Abed'nego found themselves when King Nebuchadnezzar, King of Babylon, ordered them to bow down and worship the golden image or be thrown into the fiery furnace from, which they were saved by God in the fire. *Daniel 3:1-29*, KJV. The moral of this narrative is that when the laws of the state are in conflict with the laws of God we must obey God even under concomitant perils. Petitioner is in the same predicament being forced to submit to an order of Satan to Cease and Desist worshipping God. If this Court does not grant certiorari Petitioner will be forced to join Sha'drach, Me'shack and Abed'nego in the fiery furnace because, "It is written, Thou shalt worship the Lord thy God and he only shalt thou serve." *Matthew 4:10*, KJV. The petition for writ of certiorari should be granted. Alternatively, the Court should grant certiorari, vacate the decision below, and remand with instructions.

Respectfully submitted,

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Dated: April 17, 2018

RULE 44.2 CERTIFICATE

Beverly Jackson, hereby certifies that this petition for rehearing is restricted to the grounds specified in Supreme Court Rule 44.2 and is presented in good faith, not for delay, and to protect Petitioner's interest as a sincere God-fearing Doctor of Nedicine seeking legal protection from Connecticut's complete ban on a core religious belief.

BEVERLY JACKSON, N.D., OCM