

21-6935 ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES

Supreme Court, U.S.
FILED
JAN 15 2022
OFFICE OF THE CLERK

Richard Roy Blake — PETITIONER
(Your Name)

vs.

People of the State of Colorado — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

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

PETITION FOR WRIT OF CERTIORARI

Richard Roy Blake
(Your Name)

3879 E. 120th Avenue, #131
(Address)

Thornton, CO 80233
(City, State, Zip Code)

(720) 309-1281
(Phone Number)

QUESTION(S) PRESENTED

- 1.) Did the City of Northglenn, Colorado police department violate Petitioner's First Amendment rights to free speech and assembly on January 4, 2020 when they issued him a ticket and threatened him with arrest while he was engaged in a peaceful protest on the sidewalk adjacent to the Metropolitan Denver North Islamic Center?
- 2.) Did the City of Northglenn repeatedly violate Petitioner's 14th Amendment rights to due process and equal protection in prosecuting him under Northglenn ordinance 9-11, 16.5, arguing that instead of being an American citizen with Constitutional rights, he was, in fact an object, obstructing a city thoroughfare.
- 3.) Is Northglenn Municipal Code 9-11,16.5 void for vagueness under 14th Amendment and overbroad under the First Amendment?
- 4.) Did the Adams District Court The Adams District err in affirming Petitioner's conviction on minor procedural grounds in an otherwise compliant appeal in violation of Section 1 of the 14th Amendment per *Bodie v. Connecticut* 401 U.S. 371 (1971) and not giving Petitioner any notice of alleged deficiencies and an opportunity to amend his appeal?

LIST OF PARTIES

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

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

RELATED CASES

United States District Court for the District of Colorado civil action pending:

No. 21-cv-00138-RMR-NYM

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OPINIONS BELOW

For cases from **federal courts**:

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

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] is unpublished.

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

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

For cases from **state courts**:

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

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

The opinion of the _____ Colorado Supreme _____ court

appears at Appendix A to the petition and is

reported at
 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 _____

No petition for rehearing was timely filed in my case.

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

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

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

For cases from **state courts**:

The date on which the highest state court decided my case was 11/8/2021. A copy of that decision appears at Appendix A.

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

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

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

U.S. Const. amend. I: Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right to assemble, and to petition the government for a redress of grievances.

U.S. Const. amend XIV Section 1: All persons born or naturalized in the United States are citizens of the United States and of the state wherein they reside, no state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty or property without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

Northglenn Colorado Municipal Code Nuisance Ordinance Chapter Nine, General Offenses and Nuisance Control Article 9-11, 16.5:

"It is unlawful for any person to willingly, maliciously, or recklessly place in any doorway or driveway not owned by him or under his lawful control or on any sidewalk, public highway, street or alley in the City any object which causes the obstruction thereof or any part thereof.

Any violation of this section is a civil infraction punishable according to Section 1-1-10 (a) (3) of the Municipal Code as amended, or is a nuisance, punishable according to this Chapter or both. In no case shall a violation of this section be deemed to be punishable by jail time. The penalty set forth in Section 1-1-10 (a) (2) does not apply."

STATEMENT OF THE CASE

In 2013 Petitioner became aware of, and began attending events which were advertised as "open houses" at the Metropolitan Denver North Islamic Center in Northglenn, Colorado. Petitioner did so out of concern for the human rights of Christian minorities in certain Islamic nations. For example, in Pakistan, Egypt and other Islamic nations many young Christian women are kidnapped, raped and forced to marry their captor and forced to convert to Islam. Where they are allowed Christian churches are often subject to terrorist attack. Christian minorities are also subjected to the same totalitarian laws that ordinary Muslims, especially Muslim women are subject to. Islamic law, which is enforced to differing degrees in Muslim majority nations, particularly Islamic republics and the Saudi and Persian Gulf monarchies. Where Islamic law is the law of the land, if a woman claims to have been raped she must produce four male Muslim witnesses or she has, de facto, confessed to adultery, which leads to imprisonment in Pakistan and the death penalty in Afghanistan.

Petitioner had hoped to find "moderate" or "reformist" Muslims. or as he preferred to call them "Muslims of good will" at the "open house." Unfortunately, Petitioner was to discover that the Islamic missionaries and mosque officials that Petitioner met at the "open houses" were far from moderate. At the first and second "open houses" the imam dismissed Petitioner's concern for Christian minorities as invalid and declared that they were an attempt to 'stir up trouble between

Christians and Muslims.' When they were being candid other Muslim missionaries were in agreement of the death penalty for apostasy (leaving Islam) and adultery, as well as rationalizing terrorist attacks as proportionate and valid responses to drone attacks.

At that point Petitioner's motive for attending the "open houses" became to act as a truth squad to inform non-Muslim "open house" attendees of the mosque's true agenda and to warn them not to give out their contact information to the mosque. After Petitioner had attended nine "open house" events, the "open house" leader, Ihsan Riahi, decided that he could no longer tolerate Petitioner's presence and called the Northglenn police to have the Petitioner "trespassed."

Upon being "trespassed" Petitioner vowed to continue to warn non-Muslims by conducting a protest on the public sidewalk on the occasions of future "open houses." Petitioner was not to make every "open house" (always held on every first Saturday), but tried his best to do so as he it was his duty to do so. Those who witnessed Petitioner's protest varied widely. On a number of occasions he (and sometimes his family), were threatened.

Petitioner reported three of the threats to the Northglenn police, but did not report all both because the police response was unhelpful and veiled threats were likely not criminal offenses. Petitioner also felt that the Muslim missionaries and mosque officials would not go through with their threats as it would not want to do so in such close proximity to the mosque, would invalidate one of the goals of the

"open house," which was for the community at large not to see them as a threat.

In any event, Petitioner did take the precaution of telling others when he was on his way to protest and in check in following the protest as a precaution.

Others who witnessed the protest, including Muslims, had a more positive reaction. Young Muslims especially, quietly told Petitioner that they supported his protest and some told him that they either planned to leave Islam or would do so if their current circumstances were to change. Many, though not all, members of the larger community showed their support with a thumbs up or honk of their horn as they drove by. Others (much fewer in number) yelled at him and flipped him off. Ihsan Riahi, the "open house" leader was highly irritated by Petitioner's protest and called the Northglenn police virtually every time, usually making false accusations against Petitioner.

On all occasions prior to January 4, 2020, the police realized that the accusations were false and that Petitioner was entitled to protest pursuant to the First Amendment, however, Riahi was never cited for making a false police report. The toleration of Petitioner's protest began to wane following the mosque's employment of off-duty Northglenn Police officers as private security and traffic control, allowing mosque attendees to cross in the middle of Irma Avenue in what would otherwise be jaywalking, especially when political events were held at the mosque featuring Northglenn officials.

Although Petitioner was occasionally joined by others who shared his concerns,

however, Petitioner was the only protester present on the sidewalk in front of the mosque on January 4, 2020 when a white pick-up going south on Irma Drive stopped next to Petitioner.

The occupants of the pickup rolled down their window and asked Petitioner if they could speak to him. One of the accusations that Riahi had made previously was that Petitioner was interfering with traffic on a previous occasion when a car had stopped next to Petitioner on the sidewalk. Responding police officers, after reviewing the closed circuit video from the mosque's surveillance cameras decided that Petitioner had not committed any offense, requested that if a similar event should occur in the future Petitioner should ask the stopped vehicle to pull into a driveway immediately south of mosque property and converse with Petitioner there.

Petitioner did exactly as the previous responding officers had requested and the pickup drove to the designated driveway where he had a conversation with the occupants of the pickup and gave them leaflets. The pickup's occupants described themselves as mosque supporters and then drove off. Petitioner noticed Riahi apparently filming Petitioner's interaction with the pickup's occupants with his phone but was not concerned as he had done precisely what had been requested by previously responding officers.

Approximately 10 minutes later a Northglenn police car pulled into the mosque parking. Another police car arrived a few minutes later. After speaking with Riahi, the first responding officer walked over to the sidewalk and asked

Petitioner to come over to talk with him. The officer and Petitioner were the only people on the sidewalk. The first responding officer, Darren Burton, told Petitioner that he would be giving him a ticket based on the film Riahi had shot with his phone from a distance of approximately 200-300 feet. Incensed, Petitioner asked him to review the mosque's closed-circuit video of the incident as that camera was considerably closer, just as previous responding officers had done. Officer Burton refused to do so. Petitioner also told Officer Burton that his protest was protected the First Amendment and a ticket would violate his First and 14th Amendment rights.

Shortly thereafter the second responding officer, Liliane Hong, walked over to where we were standing and told Petitioner that he would be getting a ticket for blocking the sidewalk and that unless he left the area immediately he would be arrested.

Petitioner took the ticket and left the area vowing to fight this suppression of his First Amendment and 14th Amendment rights, which he asserted at that time. At no time during Petitioner's presence on the sidewalk that day were any other individuals present other than Petitioner and the two Northglenn officers. The occupants in the pickup truck never stepped on the sidewalk in front of the mosque. Incredibly, when Petitioner read the ticket, he found that he was being ticketed and threatened with arrest for allegedly violating Northglenn Municipal ordinance 9-11, 16.5 is entitled "Obstructing Streets and Sidewalks" and reads:

"It is unlawful for any person to willingly, maliciously, or recklessly place in any doorway or driveway not owned by him or under his lawful control or on any sidewalk, public highway, street or alley in the City any object which causes the obstruction thereof or any part thereof.

Any violation of this section is a civil infraction punishable according to Section 1-1-10 (a) (3) of the Municipal Code as amended, or is a nuisance, punishable according to this Chapter or both. In no case shall a violation of this section be deemed to be punishable by jail time. The penalty set forth in Section 1-1-10 (a) (2) does not apply."

Petitioner noted that the ordinance applied to placing objects on thoroughfares, not physically hindering traffic. Petitioner also noted that despite the fact that Officer Hong had, in fact, threatened him with arrest if he did not immediately leave the area, the ordinance declares that "In no case shall a violation of no this section be deemed punishable by jail time." Petitioner thought the City had a very weak case and would be surprised if the City could make the facts of the case line up with the ordinance. Officer Hong's threat to arrest Petitioner was noted on the printed ticket that she issued.

Whether or not Petitioner was confident that he would prevail in court, he would have pled "not guilty" in any event. Although Petitioner had been a civil paralegal in the past, he felt that he had a better chance a lawyer. However, as Petitioner is on a small fixed income, any lawyer he employed, it would have to be pro bono. The Pacific Justice Institute agreed to represent Petitioner through Matthew Park, esq., who filed a Motion for Summary Judgment to the Northglenn court March 24, 2020.

In the motion Mr. Park, under the caption "The Court Should Dismiss the Case as Citing Defendant for an Ordinance Violation, Northglenn Violated Defendant's First Amendment Rights," writes that:

"Streets, sidewalks and parks, are considered without more, to be "public forums." U.S v. Kokinda, 497 U.S. 720, 742 (1990) (Brendan, J., dissenting) [quoting U.S. v Grace, 461 U.S. 171, 177 (1983)]. As public sidewalks are a "prototypical example of a traditional public forum, speech on public sidewalks receives the utmost protection under the First Amendment. Shenk v. Pro-Choice Network of New York, 519 U.S. 357, 377 (1997); see also Foti, 146 F.3d at 635 [quoting Frisby v. Schultz, 487 U.S. 474, 480 (1988)]

Content based regulation of speech in a traditional public forum is subject to the highest scrutiny Foti, 146 F.3d at 635. For a county to to enforce a content-based regulation, "It must show that its regulation is necessary to serve a compelling state interest and that is narrowly drawn to achieve that end." Id. (emphasis added) [quoting Perry Educ. Assn. v Perry Local Educators Assn., 460 U.S. 37,45 (1983)]....

Although county governments have "a strong interest in ensuring public safety and order [and] in promoting the free flow of traffic on public streets and sidewalks," merely asserting," merely asserting that interest is insufficient. Goodhue v County of Maui, 98 F. Supp. 3d 1133, 1143 (quoting Madsen v. Women's Health Ctr., 512 U.S. 753,768 (1994); see also Heffrom v. Intl. Society for Krisna Consciousness 452 U.S. 640 (1981). "The government show that the regulated communicative activity endangers that interest. Id.

In this case the citation that the Northglenn Police Department, hereinafter NGPD, issued to Defendant indicates that Defendant violated Northglenn Nuisance Ordinance 9-11,16.5. That ordinance however, merely states that placing an object on doorway or driveway not owned by the person or any sidewalk, public highway, street or alley in the City would be unlawful.

The officer in this case determined that Defendant standing on the sidewalk leading up to the Islamic Center was in violation of this ordinance. Defendant did not place any object on the sidewalk; he was merely standing and holding a sign. The officer's note

records the observation that Defendant's sign read "Islam Kills."

The fact that Defendant was not engaged in activity remotely resembling placing any object on the sidewalk described in the ordinance yet the officer citing the Defendant of the violation clearly shows that the NGPD intended to silence Defendant's speech...."

Mr, Park's motion goes on to argue that "2. City of Northglenn's Nuisance Ordinance is Substantially Overbroad, and thus Invalid as Applied to Defendant." The motion was not granted.

Trial was held on October 9, 2020, 10 months after the incident, in order to accommodate Petitioner's attorney time to recover from surgery on his amputated leg and possible Covid. The case was assigned Northglenn Municipal Court case #CR-2020-05. Oddly, the trial was being held amidst Covid precautions and from pretrial discussion between the judge and city attorney indicating the City had already spent significant time and money on the case, and that the City had designated the trial as a priority.

Officer Burton did not attend the trial. Petitioner, Officer Hong and Ihsan Riahi testified. Petitioner's attorney did not ask to have prosecution witnesses, Hong and Riahi sequestered. Hong and Riahi testified that they had seen pedestrians and/or bicycles have to step in the street to avoid Petitioner. As no such thing had occurred, failure to sequester the prosecution witnesses lost any chance for the defense to ask prosecution witnesses to describe the pedestrians and/or bicycle riders. Petitioner felt that he had received ineffective

counsel because of this other occurrences during the trial.

Yet even in the event that pedestrians and/or bicycle riders needed to step or ride into the street to avoid Petitioner, the ordinance only outlaws the placement of objects. As no witness had made any mention of any object during testimony and cross-examination the Northglenn City Attorney invented the outrageous, insulting and obviously unconstitutional legal theory that Petitioner himself was the object in question. Cleverly waiving his opening argument, Mr. Ausmus, the Northglenn City Attorney made certain that his arguments would be the last that the three person jury would hear and give no chance for Petitioner's attorney to challenge. The transcript of the trial from page 250 line 22 through page 251 line 1 reads as follows:

(Mr. Ausmus) "The fourth element is placed on any sidewalk public highway, street or alley any object. Now there's been a lot of discussion about what is this object, what is this? Nobody talked about the fact that Mr. Blake himself is an object."

Also during the trial the judge repeatedly made constitutionally suspect rulings against the introduction of any exculpatory documents and/or testimony. On page 149 lines 19-23 the prosecution objects to Petitioner's attorney's important and potentially exculpatory line of questioning to Petitioner:

"Mr. Park: "So is it your testimony today that had the mosque wanted to look at the surveillance video, they could have done that with a police officer at any time on January 4th?"

Mr, Ausmus: Your honor I'm going to object. That's a leading question."

From the trial transcript Page 149 lines 24 and 25 the Judge refused to allow

Petitioner to testify to the fact that the mosque had a closed-circuit surveillance system that could have given the responding officers a clearer view of the incident involving the white pickup and which might well have been exculpatory, sustain the City's objection with the inexplicable ruling:

"The objection is sustained as to leading and it's also speculation and hearsay."

On page 132 line 9 of the trial transcript, the Judge sustained the prosecution's objection to Petitioner's attorney's questioning of Officer Hong concerning the fact that the mosque had been employing members of the Northglenn Police Department, which could have provided a clear motive, a financial motive, for false testimony on the part of a Northglenn officer, demonstrating the Court's animus towards Petitioner.

Further animus toward Petitioner's cause and violation of his 14th Amendment rights was demonstrated on page 88 lines 6-13 when the Court admits that Petitioner's attorney was not allowed sufficient time to conduct voir dire, but rather than redo voir dire, issue a jury instruction properly or declare a mistrial the Court simply noted the situation and proceeded:

"The (Court) will reflect that if you had more time on voir dire you would have attempted to educated (sic) the jurors on what Islam is. I can imagine that the prosecution would have objected and we would have a different ruling about whether or not that was relevant for this trial. But there (sic) record will reflect that you feel because of the nature of voir dire, you weren't able to conduct voir dire in the way that you would like."

On page 169 lines 14-19 the Court seems to say that a mistrial ought to have

been declared and that only the many hours already committed to the case and the fact that the prosecution had not called for a mistrial stopped her from doing so

"The Court:...So that would be actually the concern of the prosecution as far as not asking for a mistrial. We have invested hours into this case. I think we would probably get a mistrial based on the statements that were made and the record that is made at that point, but the City is not asking for that, just a limiting instruction."

There were numerous other instances of the Court's interference with Petitioners defense during the trial including the Court's blocking of admission of Officer Hong's notes and instructing the jury that the notes that they would not be allowed to examine would not have been exculpatory.

While the video taken from Riahi's phone showing the Petitioner's interaction showed the incident to have occurred precisely as Petitioner has indicated it was shot from such a distance that Petitioner had to be asked if the person standing next to the truck was, in fact, him. Riahi's narration of the video falsely asserted that Petitioner was blocking traffic but at no time is Petitioner standing in front of the truck. After Petitioner gestures towards the parking lot where previous Northglenn Police officers had asked him to send anyone who stopped in traffic to talk with him, the pickup drives off unhindered by Petitioner. In her testimony, however, Officer Hong declared that she would have ticketed Petitioner whether or not the pickup stopped on its own accord. But again, no object was identified.

Inexplicably the jury was not able see through the City's agenda and voted

to convict Petitioner on the ordinance violation. Petitioner's attorney turned down the opportunity to poll the jury in spite of believing that one of the three jurors was sympathetic to Petitioner. This is one of several instances that Petitioner believes he was provided with ineffective counsel. Petitioner believes this was largely caused by Petitioner's attorney's health situation and the surprise testimony of Riahi and Officer Hong that Petitioner's attorney rightly considered perjury.

Other instances of ineffective counsel occurred when Petitioner's attorney failed to object to Riahi's accusations, that had nothing to do with the placement of an obstructing object and was designed to prejudice the jury against Petitioner such as on Page 9 lines 6-13:

(Riahi) "No. It's the same thing as always. Screaming and trying to tell our guests who are coming into the mosque whether they're in---trying to come in with their cars or if they stop in the middle of the parking lot and he shout at them, because is trespasser. He can't come into the mosque. But he shout at kids, at kids or our guests. You going to hell. Islam is this. Islam is that."

For the record Petitioner has never told anyone that they are going to hell as he believes that is an evil thing to say and not in his power to judge.

Following the conviction and despite the fact throughout the trial that Riahi and the prosecution took no note of Petitioner's protest and told the jury that the trial was solely about traffic safety the true agendas of Riahi and the City became evident in their post-trial pre-sentencing comments. On page 261 lines 1-4 Riahi is finally free to express his true grievance with Petitioner:

"Hi, your Honor. I just want to say that for the past six years, this gentleman has been coming to our mosque, harassing our guest, harassing our kids."

On page 263 lines 5-23 the prosecution petitions the Court to prohibit Petitioner from further protests at the mosque:

(Mr. Ausmus): "...And then as a matter of law based on what the Court heard today and knows about the situation, advise the Defendant as to whether his continued protesting there on the sidewalk that we've been discussing with the sign that he has, is or is not in your opinion, an obstruction. Because I am concerned that we will be back here in November on the first Saturday and having seen the evidence before the Court today, the size of the sidewalk, what I believe is required to be proved, that is impossible for somebody of Mr. Blake's size to hold a sign in the manner he was and not obstruct a portion of that highway. And I would like to diffuse the situation, not light it on fire based on what happened here today. So I think it would be helpful if the Court could give some instruction based on you have sat through today as to his continued picketing or protesting out there on the sidewalk that we were discussing in the manner that it was presented to the Court today."

Citing the costs of continuing their pro bono representation in the appeals process, Petitioner's attorney and Pacific Justice Institute withdrew from the case following the conviction of Petitioner, forcing Petitioner to appeal the case pro se.

Petitioner appealed his conviction to Adams District Court in Brighton, Colorado. Adams County assigned case # 20CV86.

Petitioner filed a Notice of Appeal and Designation of Record on October 30, 2020 with Adams District Court pro se. An Opening Brief was filed on November 17, 2020. An Amended Opening Brief was filed on February 5, 2021 when the transcript of the trial became available. An Answer Brief was filed on February 24, 2021. No Reply Brief was filed.

On June 23, 2021 Adams District Court affirmed Petitioner's conviction citing minor deficiencies in Petitioner's appeal including Petitioner's use of "reasonableness" as a standard of review although Adams County Public defenders use that standard frequently. Adams District Court also apparently assumed that it had been Petitioner's preference to file the case pro se. Adams District Court did not inform Petitioner of these deficiencies and allow him the chance to file an amended appeal.

On June 21, 2021 the court upheld the conviction which is attached as Appendix B. Petitioner then filed an application for a Writ of Certiorari with the Colorado Supreme Court, Colorado Supreme Court Case #: 2021SC559. The application was denied without comment on November 8, 2021, which is attached as Appendix A.

REASONS FOR GRANTING THE PETITION

In its order affirming Petitioner's conviction, which is contained in Appendix B, under the heading "Legal Standard at the beginning of the second paragraph the court writes that a deficient appeal may move forward if it address a "public interest." Yet what more vital "public interest" can there be than to protect American citizens from a foreign, subversive, totalitarian entity that seeks to corrupt (and has been successful in the case of the City of Northglenn) and eventually dominate? What greater vital "public interest" can there be than to assert that American citizens have Constitutional rights and must never be considered "objects" by any government?

In the fashion of all totalitarian ideologies, Islam seeks to outlaw any criticism, using whatever means are at their disposal. In Pakistan and other Islamic republics the laws against criticism of Islam or Mohammed are enforced by the state or by the mob.

The actions of the Northglenn Police Department in ticketing and threatening Petitioner with arrest were clearly, and somewhat clumsily done, in an effort to infringe on Petitioner's First Amendment rights and rights under the Constitution of Colorado. The Adams District Court erred in affirming Petitioner's conviction on minor procedural grounds according to. *Bodie v. Connecticut* 401 U.S. 371 (1971). *Bodie* argues that striking down an appeal on minor procedural grounds in a violation of Section 1 of the 14th Amendment.

Prior to the change in attitude of the Northglenn Police Department towards Petitioner's protest, Petitioner asked an officer if he thought the statistic he had seen that 80% of US mosques embraced a militant ideology. The officer told Petitioner that there was no such thing as a "moderate" mosque in the Denver area.

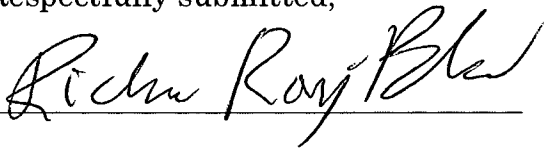
Petitioner acknowledges that his opinions might not be considered politically correct. He considers the Islamic ideology, and fundamentalist Muslims whose aim is eventual world conquest, to be subversive and totalitarian. In fact, he considers totalitarian Islam to be the equivalent, if not more egregious ideology, of fascism. ISIS committed atrocities that would have made the SS queasy.

While clearly the impetus that caused the City of Northglenn to cite and threaten Petitioner with arrest for being an obstructing object, it was clearly at the behest of an outpost of a dangerous and anti-democratic ideology that is deserving of condemnation and protest. Ayaan Hirsi Ali put it best when she said "tolerance of intolerance is cowardice." Following his conviction in Northglenn Municipal Court, Petitioner quoted President John Kennedy to the Court, letting them know that though they were today successful in suppressing free speech, there would likely be unintended consequences. "Those who make peaceful protest impossible," Kennedy said make violent protest inevitable."

CONCLUSION

It may seem on the surface that a ticket for a \$500 ticket and threat of arrest in a relatively small suburban community is a trivial matter. Yet the deprivation of Petitioner's (and presumably others) Constitutional rights at the behest of adherents to a militant, subversive and totalitarian ideology that seeks to silence any and all criticism is a matter of massive importance. The petition for a writ of certiorari should be granted.

Respectfully submitted,



Date: January 17, 2022