

---

No. #25M42

---

**In The  
Supreme Court of The United States**

---

**Samuel Ghee**  
**Natural Person none Corporation**  
*Petitioner*

**Vs.**

**FLIX NORTH AMERICA INC. parent company of  
GREYHOUND LINES, INC**  
**Officer George Moore,**  
**Personal Capacity**  
**Officer Isaac Sanchez,**  
**Personal Capacity**  
*Respondent*

---

**On Petition for a Writ of Certiorari to the United States  
Court of Appeals for the 11<sup>th</sup> Circuit**

---

**PETITION FOR A WRIT OF CERTIORARI**

---

**SAMUEL GHEE**  
P.O. Box 92120  
Atlanta, Georgia 30314  
Phone: 404 998-6144  
gheesamuel@yahoo.com

## Questions

1. Why did both lower court judges say a fourth amendment seizure requires an arrest and refuse to challenge your stare decisis ruling, *Hodari D.*, 499 U. S., at 624, that states it doesn't require arrest or detention "A seizure doesn't have to necessarily result in actual control or detention. It is true that, when speaking of property, "[f]rom the time of the founding to the present, the word 'seizure' has meant a 'taking possession.'" cited in the original Complaint?
2. If officers acknowledges no criminal activity and no reasonable suspicious or probable cause to act but start assuming the incident being under domestic duties using their authority to take possession of Petitioner's freedom of movement from reboarding a bus that breach Georgia's *Motor contract carrier* laws a private contract agreeing with the same bus driver refusing Petitioner contract paid service, would this be a "meeting of the minds" as in *Adickes a Conspiracies Between Public Officials and Private Persons*, *Adickes v. S. H. Kress & Co., Id. at 158*, 90 S. Ct. at 1609,?
3. How is it that the lower district courts expecting self-litigants/pro se to support all allegations with supporting proof when this lower court judge granted respondent/defendant's motion that claimed separate entities having no supporting proof nowhere found on the record

## OPINIONS BELOW

Petitioner's Complaint, (Doc. 1), 04/27/2023.

The District Court's Final Judgement, (Doc. 75) on 7/25/2024.

The 11<sup>th</sup> Circuit issued its last panel decision, (Doc. 29-`1) on August 20, 2025.

## JURISDICTION

This Court's jurisdiction is invoked under 28 U.S.C. 1254(1).

## STATUTORY PROVISIONS INVOLVED

Title §42 U.S.C. 1983, Fourth amendment seizure that breached a private contract as this court have already stated that a seizure can take the form of "physical force" or a show of authority that "in some way restrains the liberty of the person as stipulated in this case.

Also, Public Officials and Private Persons Conspiracies, *Adickes v. S. H. Kress & Co., Id. at 158, 90 S. Ct. at 1609*. The governing principles for a Title 42 USC, Section §1983 Conspiracy with a private party Claim, 'a Meeting of the minds' and thus they reached an understanding that petitioner should be refused service. The bus driver made-up lies and use police officers as a weapon to terminate Georgia's *Motor contract carrier* service laws of Petitioner as passenger.

And, irrelevant motives of officials thinking because they have a shield of absolute and qualified immunity, they can rig the outcome of a situation and be supported by each other.

## INTRODUCTION

The made-up language written in the lower court's judgements/orders/opinions are only irrelevant narratives that only blame the Petitioner for bringing the case seeking remedy for rights violated. Instead of addressing and refuting the cause of actions in the Petitioner's original complaint, (see Doc. 1), they prefer to blame the self-litigant/pro se as stated all throughout their writings of what petitioner didn't do.

## STATEMENT OF THE CASE

Two police officers and a *Motor contract carrier* bus driver used their authority to seize Petitioner's freedom of movement voiding Georgia's *Motor contract carrier* laws that left Petitioner stranded hundreds of miles away from his paid designation. Officers had no reasonable suspicious nor probable cause to do anything to Petitioner. They used guns and badges as authority and breached Georgia common carrier's law. The bodycam footage, the 911 call, the incident report filed as evidence are unrefuted all showing sequential events of the false inconsistence statements made by the contract carrier's bus driver, who accused Petitioner of loudly talking. Even the passengers on that bus couldn't confirm those false statements. The truth was that Petitioner was only listening and responding to a seated female passenger next to him only talking at the sound pitch of the louder fifty-year-old bus engine. When asked, the police officers refused to take statements from passenger seated next to Petitioner and the bodycam show this evidence. Petitioner was able to take interrogatories (see Doc. 66) from officer Sanchez, an immigrant officer supervisor who came out, *see evidence bodycam footage*. Officer stated that they treat every incident as domestic, are not the laws of this country, yet he has supervisor status. The court undermine this very issue when raised in the lower court.

## REASONS FOR GRANTING THE PETITION

1. The reason for granting this petition is because both lower court's judgements/orders/opinions have so far departed from the accepted and usual course of judicial proceedings in this case. The language in their judgements/opinions/rulings is made-up narratives and no relevant reason at all to the issues in the original complaint. The Judicial Conduct and Disability Act classifies such statement as irrelevant motives if they didn't directly address nor refute the issues in the case. See *Rule 11 (b), Judicial Conduct and Disability Act, an act of congress*, there in the commentary, stating that if the rulings are not relevant on its face, additional inquiry should take place. When judicial conduct was filed there at the 11<sup>th</sup> circuit, they refuse to take it seriously nor look further into the matter.
2. Flix's and Greyhound Motion to dismiss were granted on the grounds of being separate entities but never proven. Greyhound was a dissolved corporation Petitioner placed evidence on the record showing in the business record at the secretary of State of Georgia business registry. The only way the Greyhound business operated was by the owner Flix. This issue was raised in the district court only to be ignored.
3. The issue that both lower court's rulings wrongly agreed on was that an arrest has to take place for a seizure to occur but never refuted this stare decisis ruling cited in the original complaint.

A seizure of a person, which can take the form of "physical force" or a show of authority that "in some way restrains the liberty of the person.

*Terry v. Ohio*, 392 U. S. 1, 19, n. 16 (1968). A seizure doesn't have to necessarily result in actual control or detention. It is true that, when speaking of property, "[f]rom the time of the founding to the present, the word 'seizure' has meant a 'taking possession.'" *Hodari D.*, 499 U. S., at 624 (quoting 2 Webster 67). *Hodari D.*, 499 U. S., at 624.

4. In both the 11<sup>th</sup> circuit and the district court order, (see appendix,) none of which never did fully touch on Georgia's *Motor contract carrier* laws properly. Motor contract carrier is well established in Georgia as a contract under Article 1, SECTION 10. Clause 1. In the *district court's order, page 7 and 8, see Appendix starting at page 8*, it cites to justify its reasonings stating that "if Petitioner were free to go it was not a seizure" as though being denied to get back on the bus at that stop was the paid designation. This is a bias mentality these judges thinking somehow that Petitioner hangs out in that area. This ruling/opinion never did explain the real facts about the officers used their authority to breach Georgia contract law and took possession with their authority which is the main issue of this case. The overall and conclusion of the whole entire order was to make up statements to lie about an arrest or detention was needed or has to take place before a seizure occurs when US Supreme Court stare decisis ruling already states differently.

5. *The 11<sup>th</sup> circuit final opinion on page 6, 7 and 8 (see Appendix starting at page 18)* this court bases their ruling on *Peery v. City of Miami*, 977 F. 3d 1061, 1071 (11<sup>th</sup> Circuit 2020), also stating that Petitioner was free to go after the encounter and on page 8,9, and 10 it stooped to lying trying to be a witness of the case a judge want-to-be witness and stating that Petitioner wasn't injured. If anyone who is left miles away from their designation with insults and embarrassment, this judge labeled it as not being an injury.

They also never gave an opinion on the use of the officer's authority when having no reasonable suspicious or any probable cause to act at all.

A common carrier of passengers is bound to exercise extraordinary diligence to prevent insult, injury, or harm to a passenger transported by it. *Hames v. Old S. Lines*, 52 Ga. App. 420, 183 S.E. 503 (1935). If plaintiff suffered insult and was embarrassed and mortified by reason of any negligent acts of the defendant common carrier or its servants or their failure to perform their legal duty towards the person as a passenger, then the passenger would be entitled to recover. *Hames v. Old S. Lines*, 52 Ga. App. 420, 183 S.E. 503 (1935).

6. In Article 1, SECTION 10. Clause 1, the Contract Clause provides that no state may pass a "Law impairing the Obligation of Contracts. The situation should have resulted back to Georgia's *Motor contract carrier* laws, O.C.G.A. § 46-9-1, once Petitioner was free from the officer's encounter for the obligation to get Petitioner to his designation.

Petitioner was injured and suffered insults and embarrassment and other emotional damages as stated in *Hames v. Old S. Lines*, 52 Ga. App. 420, 183 S.E. 503 (1935).

The summarized statutory elements of a 42 USC § 1983 cause of action that shows no injury, "A plaintiff must prove (1) a person (2) acting under color of state law (3) subjected the plaintiff or caused the plaintiff to be subjected (4) to the deprivation of a right secured by the Constitution or laws of the United States," there's a common injury whenever encountering an incident with state officials.

#### CONCLUSION

Imagine how many cases are stolen from self-litigants/Pro se unable to compete with an organized judicial system using the people's power for their own agender. Using false narratives that never directly challenged the main issues in the original complaint nor refute none of your Supreme Court well established stare decisis rulings. There's no doubt that this case has to be remanded and refuted properly.

Executed this 3<sup>th</sup> day of February, 2026



---

Samuel Ghee  
P.O. Box 92120  
Atlanta, Georgia 30314  
Phone: 404 998-6144  
gheesamuel@yahoo.com