

No. _____

In the

Supreme Court of the United States

Silas Salyers,
Petitioner

v.

Clifford B. Walker,
Respondent

On Petition For a Writ Of Certiorari To The
Michigan Supreme Court

PETITION FOR A WRIT OF CERTIORARI

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QUESTIONS PRESENTED

I. Whether a state court violates the **Due Process Clause of the Fourteenth Amendment of the U.S. Constitution** by entering judgment of eviction against the landowner without a trial or evidentiary hearing?

II. Whether a state court violates the **Due Process Clause of the Fourteenth Amendment of the U.S. Constitution** by refusing to disqualify the same judge who was the decision maker in the prior trespass case with the same parties, same request for possession not granted in the 1st case?

III. Whether a state court violates the Fundamental Right to Contract Under the **Due Process Clause of the Fourteenth and the U.S. Constitution Contract Clause** by ordering Petitioner to be evicted from his own home and farm which he never contracted away to Respondent?

IV. Whether a state court violates the **Due Process Clause of the Fourteenth Amendment of the U.S. Constitution** by ruling contrary to the binding law?

V. Whether a state court enabled a **RICO**¹ scheme of Respondent's taking of Petitioner's home and farm without paying for it when it issued judgment of possession to someone who has no transfer deed in his name and has not paid for the property?

¹ Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. 96

PARTIES TO THE PROCEEDINGS

Petitioner Silas Salyers, is a deed holder and the property record owner of the subject property. **Petitioner's Appendix**, pp. 40a-47a (deeds in the chain of title, county property record).

Respondent Clifford B. Walker is a personal representative of Petitioner's late sister Evelyn Walker's estate. Since 2019, Respondent Clifford B. Walker was engaged in extortion of Petitioner Silas Salyers forcing him to give up his home and the 79-acre farm without paying for it, and has paid at least \$225,000 to attorney Martin G. Lozier in furtherance of such effort.

CORPORATE DISCLOSURE

Petitioner is an individual and is not a subsidiary or affiliate of a publically owned corporation.

RELATED PROCEEDINGS

Walker v. Salyers, No. 169252, Michigan Supreme Court. Order entered on January 23, 2026.

Walker v. Salyers, No. 376914, Michigan Court of Appeals. Opinion issued on September 29, 2025.

Walker v. Salyers, No. CC: 24-000919-AV, Ingham County Circuit Court. Order on appeal entered on July 28, 2025.

Walker v. Salyers, No. 24-1075-LT, Ingham County 55th District Court, Order Entered on November 14, 2024

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PETITION FOR A WRIT OF CERTIORARI

This case concerns Petitioner Silas Salyers' \$669,000 farm and home in Stockbridge, Michigan. (**Petitioner's Appendix**, pp. 40a-47a, Chain of title, property tax roll record). Real estate fraud is common, especially when the land is closely located to oil companies' depositories, like in this case. Respondent Clifford B. Walker and his Attorney Martin G. Lozier made false statements in court and to the tax authorities in hopes to take Petitioner's home and farm for free. Respondent Walker has paid attorney Martin G. Lozier at least \$225,000 for this 7-year effort to get Petitioner's farm and home without paying anything to Petitioner, then sell it, and apparently split the proceeds with his attorney.

There was no trial or any evidentiary hearing in this case of trespass/eviction despite Petitioner's demand for a jury trial. The parties were ordered to appear for a pre-trial conference on November 14, 2024,¹ when Hon. David L. Jordon without a notice issued an order of possession to Respondent Walker (**Petitioner's Appendix**, p. 6a), despite the uncontroverted documentary record of the chain of title in Petitioner Silas Salyers (**Petitioner's Appendix**, pp. 40a-47a).

Petitioner Silas Salyers, the deed holder and the property record owner of the subject property (**Petitioner's Appendix**, pp. 40a-47a), petitions this Court for a writ of certiorari to review the record of the Michigan Supreme Court that affirmed the lower courts' orders of trespass and eviction by Respondent Clifford Walker who actually failed to produce a deed

¹ <https://micourt.courts.michigan.gov/case-search/court/D55/case-details?caseId=2024-241075LT-LT&tenantKey=D55-33-0631694-00-00&searchUrl=%2Fcourt%2FD55%2Fsearch%3FlastName%3Dsalyer%26firstName%3Dsilas%26page%3D1>

transferring the 79-acre parcel from Petitioner Salyers to the Estate. Respondent Clifford B. Walker had undisputedly never paid for this property, which is not for sale. However, Respondent Walker has been trying to fraudulently take Petitioner's property by making false statements in court, to the township, to the police, and to the county authorities that allegedly Respondent is the owner.

By issuing judgment of possession against Petitioner and eviction of Petitioner, the legal owner of the land, state judges denied Petitioner Silas Salyers due process and equal protection, as they ruled contrary to the statutes and clear precedents, violated Petitioner's fundamental right to contract and the Contract Clause of the U.S. Constitution. Damages to Petitioner's property and health keep mounting for the 86-year-old homeowner and farmer with a heart condition after he was evicted on August 25-29, 2025 out of his farm and home that he built in 1994 with his own two hands, and when a lifetime worth of Petitioner's possessions were put out to the curb, although Petitioner Silas Salyers is a deed holder and the record owner of the subject property (**Petitioner's Appendix**, pp. 40a-47a, 59a-61a). This is an extreme form of the most egregious violation of Petitioner's constitutional rights and the binding rule of law, which resulted in substantial unjustified damages to Petitioner.

OPINIONS BELOW

On January 23, 2026, the Michigan Supreme Court issued Order No. 169252, which affirmed the Court of Appeals Order No. 376914, Ingham County 30th Circuit Court Orders in No. 24-919-AV, and the 55th District Court Order dated November 14, 2024 (**Petitioner's Appendix**, 1a-7a).

JURISDICTION

Petitioner's Application to the Michigan Supreme Court for Leave to Appeal the Court of Appeals' order was denied on January 23, 2026, leaving lower courts' rulings to stand, by which the state judiciary denied Petitioner due process, equal protection rights, and violated the Contract Clause of the U.S. Constitution. Petitioner invokes this Court's jurisdiction under 28 U.S.C. §1257, having timely filed this petition for a writ of certiorari.

CONSTITUTIONAL PROVISIONS INVOLVED

United States Constitution, Article VI, Clause 2: "This Constitution, and the Laws of the United States... shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding."

United States Constitution, Amendment V: "No person shall... be deprived of life, liberty, or property, without due process of law."

United States Constitution, Amendment XIV: "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."

United States Constitution, Article I, Section 10: "No state shall pass any Law impairing obligation of contracts."

STATEMENT OF THE CASE

Due process and equal protection clauses of the U.S. Constitution guarantee that no state or private actors under the color of state law would take away property or liberty without due process of law. In *Shelley v. Kraemer*, 334 U.S. 1, S. Ct. 836, 92 L. Ed. 1161, 3 A.L.R. 2d 441(1948), this Court affirmed that judiciary are state actors who must comply with the due process and equal protection requirements. The doctrine of stare decisis precludes judges from discriminating against litigants as it imposes the strict duty to apply the binding law to all claimants, affording each person the requisite due process.

This case presents a complete denial of due process and equal protection by the Michigan state judges to Petitioner/Landowner Silas Salyers when they ordered him to be evicted from his own house and farm (**Petitioner's Appendix**, pp. 40a-47a (deeds in the chain of title, county property record)), by Respondent Walker who failed to produce a deed in his name and made false statements in court that allegedly the assessor had a record in his name and he paid all the taxes current. **Petitioner's Appendix**, §6 at p. 10a. Not true. See **Petitioner's Appendix**, pp. 40a-47a, County record in Petitioner Silas Salyers' name as well as the chain of title.

There was no trial in this case despite Petitioner's demand for a jury trial. At a pre-trial conference on November 14, 2024 (**Petitioner's Appendix**, p. 9a (Settled Record of the Pre-trial hearing), Hon. David L. Jordon without a notice issued an order of possession to Respondent Walker (**Petitioner's Appendix**, p. 6a (Judgment of Possession)), despite the uncontroverted documentary record of the chain of title in Petitioner Silas Salyers' name (**Petitioner's Appendix I**, p. App. 40-47).

REASONS FOR GRANTING THE WRIT

To avoid deprivations of one's home and family farm without a notice or hearing, by a biased judge, and to avoid violations of the substantive due process right to contract, this Court should grant review and order reversal of the Michigan state court's order which is in direct violation of the U.S. Constitution

In *Shelley v. Kraemer*, 334 U.S. 1, S. Ct. 836, 92 L. Ed. 1161, 3 A.L.R. 2d 441(1948), the United States Supreme Court expressly affirmed that the action by the judiciary is a state action:

[T]he action of state courts and judicial officers in their official capacities is to be regarded as action of the State within the meaning of the Fourteenth Amendment is a proposition which has long been established by decisions of this Court.... 'It is doubtless true that a State may act through different agencies, either by its legislative, its executive, or its judicial authorities, and the prohibitions of the amendment extend to all action of the State denying equal protection of the laws, whether it be action by one of these agencies or by another.'

In the consolidated case *Shelley v. Kraemer*, *Supra*, this Court also required a reversal in a Michigan case *Sipes v. McGhee*, 316 Mich. 614, 25 N.W.2d 638 (1947) ruling that the action of Michigan judges as state actors violated the claimant's constitutional rights and must have been reversed.

I. Petitioner Was Denied Due Process When He Was Ordered To Be Evicted From His Own Home and Farm At Pretrial Conference

The U.S. Constitution prohibits state governments from depriving its citizens of their private property and liberty without due process. "No person shall... be deprived of life, liberty, or property, without due process of law." U.S. Const. amend. V. Under U.S. Const. amend. XIV:

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.

There was no notice to Petitioner/landowner that at a pre-trial conference the court was going to enter judgment of possession and eviction against him. There was no trial in this case despite Petitioner's demand for a jury trial. The parties were ordered to appear for a pre-trial conference on November 14, 2024 (**Petitioner's Appendix**, p. 9a), and Judge David L. Jordon without a notice issued an order of possession to Respondent Walker (**Petitioner's Appendix**, p. 6a), despite the uncontroverted documentary record of the chain of title in Petitioner Silas Salyers (**Petitioner's Appendix**, p. 40a-47a), and while Respondent Walker failed to produce a deed in his name and made false statements in court that allegedly the assessor had a record in his name and he paid all the taxes current. **Petitioner's Appendix**, §6 at p. 10a. Not true. See **Petitioner's Appendix**, pp. 40a-47a

(The chain of title and the property record in Silas Salyers' name).

As a result of the November 14, 2024 order, Respondent was evicted by Respondent Walker out of his own home and farm on an expired Order of eviction on August 25-29, 2025. See **Petitioner's Appendix**, pp. 59a-61a, which show the devastating effect of eviction of the 86-year old farmer when 86 years of his life possessions were thrown to the curb and perished.

THEREFORE, intervention of this Court is critical to restore fundamental justice and require state courts to provide a notice and requisite hearing before deprivation of someone of his own home and farm, to prevent harassment and evictions of landowners out their own homes by opportunists like Respondent Walker and Attorney Lozier who have not paid for such property and have no transfer deeds in their names.

II. Michigan State Court Denied Petitioner Due Process By Failure To Disqualify Judge David L. Jordon, the Initial Fact-finder and Decision-maker On Trespass

"The Due Process Clause requires an unbiased and impartial decisionmaker." *Cain v Dep't of Corrections*, 451 Mich 470, 498; 548 NW2d 210 (1996). In *Crampton v Dep't of State*, 395 Mich. 347, 351; 235 N.W.2d 352 (1975), the Michigan Supreme Court said: "A hearing before an unbiased and impartial decisionmaker is a basic requirement of due process. ... The United States Supreme Court has disqualified judges and decisionmakers without a showing of actual bias in situations where 'experience teaches that the probability of actual bias on the part of the judge or decisionmaker is too high

to be constitutionally tolerable [emphasis added]."
Michigan courts have reaffirmed requirements of the federal due process. In *Clemens v Bruce*, 122 Mich App 35, 329 NW2d 522 (1983), the court affirmed that "[a]mong the situations identified by the Court as presenting that risk are where the judge or decisionmaker ... (2) 'has been the target of personal ... criticism from the party before him'; ... or (4) might have prejudged the case because of prior participation as ... fact finder or initial decisionmaker."

To afford claimants due process, judicial disqualification is warranted under MCR 2.003(C)(1)(b) where

"[T]he judge, based on objective and reasonable perceptions, has either (i) a serious risk of actual bias impacting the due process rights of a party as enunciated in *Caperton v Massey*, 556 US 868; 129 S Ct 2252; 173 L Ed 2d 1208 (2009), or (ii) has failed to adhere to the appearance of impropriety standard set forth in Canon 2 of the Michigan Code of Judicial Conduct."

The U.S. Supreme Court instructed that in the due process analysis, "[w]e do not question his subjective findings of impartiality and propriety. Nor do we determine whether there was actual bias." *Caperton*, Supra at 882. "The Court asks not whether the judge is actually, subjectively biased, but whether the average judge in his position is "likely" to be neutral, or whether there is an unconstitutional "potential for bias." *Caperton*, Supra at 881.

The Michigan state courts issued a ruling contrary to the requirements that judicial disqualification is warranted under *Caperton v*

Massey, 556 US 868; 129 S Ct 2252; 173 L Ed 2d 1208 (2009) and MCR 2.003(C)(1)(b) where "the judge, based on objective and reasonable perceptions, has ... (i) a serious risk of actual bias impacting the due process rights of a party as enunciated in *Caperton v Massey*, 556 US 868; 129 S Ct 2252; 173 L Ed 2d 1208 (2009). In *Clemens, Supra*, the court affirmed that "[a]mong the situations identified by the Court as presenting that risk are where the judge or decisionmaker ... (4) might have prejudged the case because of prior participation as ... fact finder or initial decisionmaker." For example, the U.S. Supreme Court Case *Caperton v Massey*, 556 US 868; 129 S Ct 2252; 173 L Ed 2d 1208 (2009) referenced *In Re Murchison*, 349 U.S. 133 (1955) as an example of a proceeding where the judge should be disqualified because he had previously participated as a fact-finder and a decision-maker in a prior proceeding. *In Re Murchison*, a Michigan state judge served as a "one-man grand jury" under Michigan law in investigation of a crime. Later, the same judge, after a hearing in open court, adjudged two of the witnesses guilty of contempt based on what he learned during that investigation, and sentenced them to punishment. The U.S. Supreme Court held that trial and conviction for contempt before the same judge violated the Due Process Clause of the Fourteenth Amendment.

Judge David L. Jordon had adjudicated this **2nd** trespass case with the same parties, the same property, and the same, second-time-around request for possession, while he clearly already had a predisposition to rule for Respondent Walker, as Judge Jordon was an initial fact-finder and a decision-maker on the same trespass issue when he did not grant possession in the prior trespass Case CC 22-463-CH, on the same request for possession

(**Petitioner's Appendix**, pp. 51a, 20a-21a (Complaint Excerpt, Order). Plaintiff Walker has never had a transfer deed in his name to the subject property and never paid to Petitioner Salyers for it, which has been exclusively owned and occupied by Petitioner Silas Salyers (**Petitioner's Appendix**, p. 40a-47a (Chain of Title, County Tax record). Hon. David L. Jordon had already clearly indicated that he was going to rule for Respondent in this case even at the hearing for his disqualification on July 25, 2024: "THE COURT: ... the kind of talking you are doing about the deeds ... I don't find there's any merit in that at all." Judge Jordon disregarded the law which required for a claimant to have a deed in his name before he can sue for trespass. Judge Jordon violated Petitioner's due process rights by ruling at a pre-trial conference, despite Petitioner's jury demand and without any kind of trial or evidentiary hearing.

In *Clemens supra*, the court affirmed that "[a]mong the situations identified by the Court as presenting that risk are where the judge or decisionmaker ... (2) 'has been the target of personal ... criticism from the party before him'." Judge Jordon was also subject to disqualification pursuant to MCR 2.003(C)(1)(b)(2)) because the probability of actual bias on the part of Hon. David L. Jordon was very high as he was subject to criticism by Defendant through his counsel, Elena A. Paremsky, during the hearing on the parties' motions for summary disposition and post-judgment proceedings in the initial trespass Case 22-463-CH when Hon. David L. Jordon ignored Defendant's attorney's rightful inquiry about the law that he used to justify an award of trespass damages to Plaintiff Walker who never presented a transfer deed in his name to the subject property, and which was never in its possession. The chain of title is undisputedly in

Defendant Silas Salyers. **Petitioner's Appendix**, pp. 40a-47a. Respondent's attorney even admitted in open court on an appeal of the dismissed reformation case that Silas Salyers "owns the 79-acre farm."² Petitioner's counsel also raised a concern in briefs and in open court regarding Judge Jordon's demand for filing of an Affidavit with the Register of Deeds by Defendant's attorney who was told to declare null and void Mr. Salyers' 2022 corrective documents filed pursuant to the statutory authority, MCL 565.451d and MCL 565.451a, while knowing that Petitioner's counsel's personal knowledge and belief were that such documents were legally valid and were not null and void. Ordering someone to sign an affidavit that is contrary to the affiant's personal knowledge and beliefs raises an issue of Subornation/Perjury because the affiant is ordered under oath to make statements, which the affiant does not believe to be truthful. MCL 750.423 - MCL 750.425. Because Hon. David L. Jordon was subject to criticism by Defendant through his counsel, "the probability of actual bias on the part of the judge ... [was] too high to be constitutionally tolerable." Thus, his disqualification was required to afford the constitutional due process to Petitioner Silas Salyers.

The end result of failure to disqualify is Judge Jordan's heavily biased ruling without any regard to the actual evidence or law, followed by eviction orders of Petitioner/ Landowner Silas Salyers out of his own home and farm by Respondent Walker who failed to present a transfer deed in his name and who made false statements in court that the Property Tax

² Oral Argument, April 5, 2023, at 1:01:32, <https://www.youtube.com/watch?v=D-S13SWx7oE&t=2861s>
"[Ms. Paremsky] ... went out and prepared and recorded her own version of a cloud on title on that deed that reflects that her client now owns the 79-acre farm." See 1:01:24-1:1:39

Roll was in Respondent Walker's name (**Petitioner's Appendix**, §6 at p. 10a), despite the uncontroverted documentary record of the chain of title in Petitioner/Landowner Silas Salyers (**Petitioner's Appendix**, p. App. 40a-47a).

III. Michigan State Courts violated Petitioner's Fundamental Right to Contract Under Due Process Clause of the Fourteenth Amendment and the U.S. Constitution Contract Clause By Ordering Eviction of the Landowner

The Due Process Clause of the Fourteenth Amendment protects the individual right to freedom of contract as a substantive fundamental right. *Lochner v New York*, 198 US 45 (1905). "[T]he State, in the exercise of its powers, may not unduly interfere with the right of the people to enter into contracts that may be necessary and essential in the enjoyment of the inherent rights belonging to everyone, among which rights is the right "... to live and work where he will; to earn his livelihood by any lawful calling; to pursue any livelihood or avocation." *Id.* at 66. Real property contract law is clear that land conveyance documents must be in writing, must be certain and definite as to property and other conveyance terms, and must be signed by the party to be charged. MCL 566.106, MCL 566.108; *Marina Bay Condominiums, Inc. v Schlegel*, 167 Mich. App. 602, 423 N.W.2d 284 (1988).

"[T]he action of state courts and judicial officers in their official capacities is to be regarded as action of the State within the meaning of the Fourteenth Amendment. *Shelley v Kraemer*, 334 US 1, SCt 836, 92 LEd 1161, 3 ALR 2d 441(1948).

State judges David L. Jordon, Rosemarie Aquilina, and Michelle M. Rick had ruled contrary to the law of real property contracts when they ordered/confirmed Petitioner's eviction from his own house and farm (**Petitioner's Appendix**, pp. 40a-47a (deeds in the chain of title, county property record)), by Respondent Walker who failed to produce a deed in his name and made false statements in court that Respondent Walker owned the farm, county tax record in his name, and he paid all the taxes current. **Petitioner's Appendix**, §6 at p. 10a. NOT TRUE. See **Petitioner's Appendix**, pp. 40a-47a (Chain of title and the County record in Petitioner Silas Salyers' name).

The United States Constitution, Article I, Section 10 guarantees that "[n]o state shall pass any Law impairing obligation of contracts." In *Shelley v Kraemer*, Supra, the United States Supreme Court affirmed that the action by the judiciary is a state action. In order for Respondent Walker to claim ownership of Petitioner Salyers' \$669,000 home and farm, Respondent Walker has to present a conveyance agreement that comports with the Statute of Frauds, signed by Petitioner Salyers, the party to be charged, (MCL 566.106, MCL 566.108, *Marina Bay Condominiums*, Supra), and none exists.

The state courts in this action had made a ruling which grossly impaired Petitioner Silas Salyers' contractual obligations as they ruled to evict him from his own home and 79-acre family farm by Respondent Walker without Respondent Walker paying for it and while Petitioner Silas Salyers has no intentions of selling it, let alone to Respondent Walker.

Respondent Walker's 7-year efforts including TWO trespass cases, his unsuccessful attempt to

harass Petitioner through the police in 2022 by criminal trespass charges, and harassment of the county and township officials trying to sway them to put the Petitioner Salyers' farm into the Respondent Walker's name when he uninvitingly paid a few thousand of property taxes, were initiated for the purpose of taking of Mr. Salyers' \$669,000 farm and home without paying for its actual value to Petitioner Silas Salyers.

IV. Michigan Judges Violated Petitioner's Substantive Due Process Rights Under the Fourteenth Amendment By Their Corrupt Conduct In Refusing to Follow Binding Law And Evidence

Either "*corrupt* or egregious conduct that so shocks the conscience as to give rise to a due process claim. *Mettler Walloon v. Melrose Twp*, 281 Mich. App. 184, 212; 761 N.W.2d 293 (2008). "[I]t is corrupt for an officer purposely to violate the duties of his office... Any intentional and deliberate refusal by an officer to do what is unconditionally required of him by the obligations of his office is corrupt as the word is used in this connection because he is not permitted to set up his own judgment in opposition to the positive requirement of the law. ... [F]or non-discretionary acts, as here³, the refusal to perform a required duty is corruption per se." *Perkins & Boyce, Criminal Law (3d ed.)*, p. 541-542, 546-547, cited

³ "[A] court must strictly follow decisions handed down by higher courts within the same jurisdiction." *In re AGD*, 327 Mich. App. 332, 339; 933 N.W.2d 751 (2019). "When the language of the rule is clear and unambiguous, we must enforce the meaning plainly expressed. *Hinkle v Wayne County Clerk*, 467 Mich. 337, 340; 654 N.W.2d 315 (2002).

in *People v Coutu* (On Rem) 235 Mich. App. 695, 705-706; 599 N.W.2d 556 (1999).

It was the corrupt conduct of state judges who refused to perform their duties to rule according to the clear language of the statutes, court rules, and binding precedents, that resulted in violation of Petitioner's substantive due process rights. No law exists that permits eviction of a landowner, the deed holder and the official property record owner from his own home by someone has no transfer deed in his name, who has not paid to the landowner for the property, and while it is not for sale (**Petitioner's Appendix**, pp. 40a-47a (Deeds in the chain of title, County property tax record), and none was cited in by Respondent or courts in these proceedings.

V. Michigan State Courts enabled Respondent And His Attorney Lozier RICO⁴ scheme of taking real property Without Paying For It

RICO makes it a crime “for any person employed by or associated with any enterprise engaged in, or the activities of which affect, interstate or foreign commerce, to conduct or participate, directly or indirectly, in the conduct of such enterprise's affairs through a pattern of racketeering activity.” 18 U.S.C. 96 §1962(c). “Racketeering activity” includes “any act which is indictable under any of the following provisions of title 18, United States Code: ...section 1341 [18 U.S.C. 96 § 1341] (mail fraud), section 1343 [18

⁴ Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. 96

U.S.C. 96 §1343] (wire fraud).” *Id.* §1961(1). 18 U.S. Code § 873:

Whoever, under a threat of informing, or as a consideration for not informing, against any violation of any law of the United States, demands or receives any money or other valuable thing, shall be fined under this title or imprisoned not more than one year, or both.

The current criminal enterprise scheme to get Petitioner's \$669,000 farm and home without paying for it started out when Respondent Clifford Walker, a resident of Florida, in 2019 texted Petitioner Silas Salyers an extortion/blackmailing threat to coerce him into giving up his home and farm to Respondent Clifford B. Walker in exchange for Respondent's not reporting Petitioner to authorities about Petitioner's SSI application. **Petitioner's Appendix**, p. 58a. The allegation was not true, but coercion was forceful and real. Respondent Clifford Walker's threats and coercive actions had continued. In 2022, Respondent Walker's step-daughter Pamela Griffith called the police on Petitioner Silas Salyers asking them to charge Petitioner with criminal trespass of Petitioner's own property. **Petitioner's Appendix**, p. 53a-57a. Pamela Griffith made false statements to the police that allegedly Petitioner Silas Salyers was renting from Respondent Walker who allegedly was a sole owner of the property, and that Petitioner had lived there for a couple of years and had not paid rent for awhile. **Petitioner's Appendix**, pp. 55a (July 9, 2022 Police Report). Pamela Griffith also made false statements that Respondent Walker was a fee simple owner of the property. Pam Griffith failed to produce a transfer deed in Respondent Walker's name. None exists. The police refused to

charge Petitioner Silas Salyers, the deed holder and the official record owner (**Petitioner's Appendix**, pp. 40a-47a) with trespass.

Respondent Clifford Walker and his attorney Martin Lozier have repeatedly intimidated the Stockbridge and Ingham County tax authorities pressuring them to put the property record in the Respondent Clifford Walker's name, but the authorities refused many times because Respondent Clifford Walker does not have a transfer deed in his name in the chain of title. Township Assessor this year again said that the deed that Respondent Walker gave her "skipped a chain of title." (**Petitioner's Appendix**, p. 63a, Voicemail Transcript).

The three attempted schemes were not working for Respondent Clifford B. Walker: (1) Petitioner would not give in to Respondent Clifford Walker's blackmail/extortion threats (**Petitioner's Appendix**, pp. 58a); (2) the police would not charge Petitioner with trespass because he was the holder of the deeds in the chain of title (**Petitioner's Appendix**, p. 53a-57a), and Michigan county officials affirmed that based on deeds in the chain of title that Petitioner Silas Salyers is the owner of his home and farm. **Petitioner's Appendix**, p. 47a. Thus, in July of 2022, Respondent Clifford Walker tried out civil trespass actions in the Michigan state courts, including this 2nd trespass action for possession/eviction of Petitioner/ Landowner Silas Salyers out of his own home and farm, despite the fact that Respondent Walker failed to present a deed in his name and made false statements in court that the Property Tax Roll was in Respondent Walker's name (**Petitioner's Appendix**, §6 at p. 10a), while the uncontroverted documentary record of the chain

of title is in Petitioner/Landowner Silas Salyers (**Petitioner's Appendix**, pp. 40a-47a).

Respondent Clifford B. Walker's attorney Martin G. Lozier, repeatedly misrepresented in open court and in his pleadings that his client was the fee simple owner of the Petitioner's home and farm, without ever producing a transfer deed in Respondent Walker's name. Despite the fact that it was Petitioner Silas Salyers who owned the property as the deed holder and the property record owner based on his undisputed deeds in the chain of title submitted to the court (**Petitioner's Appendix**, pp. 40a-47a), a visiting judge David L. Jordon, who actually retired from the district court in 2012 after 30 years, had awarded property trespass damages to Respondent Walker without stating any basis for such ruling and heavily fined Petitioner's attorney because Petitioner was indigent. In the first trespass case, the Court of Appeals judges Christopher M. Murray, Michael J. Kelley, and Noah P. Hood, despite their own admission that Respondent "Walker failed to produce a deed transferring the 79-acre parcel from Salyer to the Estate," affirmed the property trespass damages to Respondent Walker.

This was the 3rd case in the Court of Appeals that Attorney Martin Lozier (64) had before Judge Christopher Murray (61) on appeal. Judge Murray is a graduate of the small private Michigan college (1400 students) where Attorney Lozier's children, Martin G. Lozier, Jr. and Kelsey Lozier, also received their degrees. In all three court of appeals cases concerning land disputes, Judge Christopher Murray ruled for Attorney Martin Lozier's clients on land ownership claims when they did not pay for the properties: one was for adverse possession despite

permissive use;⁵ and in another case, he shortchanged the owners of their land in question, despite the condo association declaration documents to the contrary, which clearly stated that association's ownership was only to the surface waters but not for the land strip in question.⁶

In the 1st trespass case CC 22-463-CH on appeal, Judge Murray said that the Court of Appeals was ruling for Respondent Clifford Walker and that "it may happen again, from this Court, from this Panel,"⁷ and that if Petitioner and his counsel would continue to defend against trespass on appeal, they will be "going at [their] own peril,"⁸ which is authoritative intimidation with "peril"⁹ of undisclosed nature hanging in the air over this farmer and his counsel.

As a consequence of the Michigan state judges' ruling in violation of the binding law, the 86-year-old Petitioner's situation is extremely dire. As of August

⁵ German v LeForge, unpublished opinion of the Court of Appeals, Per Curiam, decided on May 24, 2007 (Docket No. 274224). (<https://www.courts.michigan.gov/c/courts/coa/case/274224>), when ownership to a strip of land which was an access easement was ordered to be transferred from the property owners to Attorney Lozier's clients who did not pay for it (adverse possession).

⁶ Scollard v Columbia Lake Association, unpublished opinion of the Court of Appeals, Per Curiam, decided on October 22, 2015 (Docket No. 322574). (<https://www.courts.michigan.gov/c/courts/coa/case/322574>), where Association was ruled a fee owner of a strip of land past the water's edge, although its ownership according to its "Declaration of Restrictions, recorded November 8, 1965, in Liber 741, Page 421, Jackson County Records, the authority of [the Association] extends only to the surface waters and bottom lands of Lake Columbia."

⁷ <https://www.youtube.com/watch?v=c0B5sQzCgSI>, at 59:10

⁸ <https://www.youtube.com/watch?v=c0B5sQzCgSI>, at 1:00:47

⁹ "peril" defined as 'with full understanding that what one is doing is dangerous and that one is responsible for one's own safety : at one's own risk' Merriam-Webster online, <https://www.merriam-webster.com/dictionary/at%20her%20own%20peril>

31, 2025, Petitioner's 86-years worth of possessions were scattered and crumbled on his front lawn by a 12-person eviction crew and left to deteriorate (**Petitioner's Appendix**, pp. 59a-61a), in front of the house that he had built, which he had never transferred to Respondent Walker, and for which Respondent Walker has not paid a dime to Petitioner Salyers.

Upon information and belief, Respondent Walker has been trying to sell Petitioner's home and farm (**Petitioner's Appendix**, p. 62a), and even found a private buyer who said he would buy it if Respondent Walker is successful in putting his name on the property tax roll at the township. Now Respondent Clifford Walker and his attorney Martin Lozier again are pressuring the Stockbridge township assessor to put the Petitioner's property into Respondent Walker's name. The assessor said that their records might not be based on the actual ownership. However, it's crucial in this case that the records are accurate. Township Assessor also said that the deed that Respondent Walker gave her "skipped a chain of title." (**Petitioner's Appendix**, p. 63a, Voicemail Transcript).

Without intervention of this Court, Respondent Walker and attorney Martin Lozier's scheme to take this 86-year-old farmer's home and farm without paying for it will continue and Petitioner's damages - to his property and to his health - will unnecessarily continue to mount. There seems to be no stopping of the 87-year-old Respondent Walker who had already paid an exorbitant amount of money (at least \$225,000) to attorney Martin Lozier to effectuate the scheme of getting Petitioner Salyers' family's \$669,000 home and farm for free and splitting the proceeds. This

scheme also calls into question mental capacities of the 87-year-old Respondent Clifford B. Walker who seems to have paid a quarter of a million dollars, apparently out of Petitioner's late sister's estate to a complete stranger, attorney Martin G. Lozier, on a claim that Respondent Walker knows to be baseless, rather than distributing that money to the estate's beneficiaries.

CONCLUSION AND RELIEF REQUESTED

Petitioner Silas Salyers is respectfully requesting that this Court issue a writ of certiorari to review the record of the Michigan courts and reverse their ruling because they violated Petitioner Salyers' due process, equal protection rights, his fundamental right to contract, and the Contract Clause of the U.S. Constitution, which resulted in fundamental unfairness when this landowner was forced out of his home and farm by the state courts without a notice of trial or trial that Respondent Clifford B. Walker and his attorney Martin G. Lozier used in their scheme to get Petitioner's \$669k home and farm for free, contrary to the law and evidence.

Dated: 4-20-2026 Respectfully Submitted,

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