

25-1370

No. _____

IN THE

Supreme Court of the United States

Supreme Court, U.S.
FILED

DEC 23 2025

OFFICE OF THE CLERK

Samreen Farid Riaz, _____

Petitioner,

v.

Dental Board Of California,

Respondent, _____

On Petition for Writ of Certiorari
to the Court of Appeal of California,
Fifth Appellate District

PETITION FOR WRIT OF CERTIORARI

Samreen Riaz,
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Visalia, California, 93292
Tel no: 951-373-0229
Petitioner, pro per litigant

Question Presented :

A: Did the Supreme court of california in error, abuse discretion and show bias denying Petition (S293171) on Dec 10 25 and left unresolved conflicted issue of law and factual issue? (including violation of 7th,5th, 1st,4th,14th amendment amendments) ? (Opinion attached as Exhibit A) .

B. Did the Fifth District Court of Appeal err in Case No. F088523 (Sept. 25, 2025) by failing to apply the mandatory independent-judgment standard of review required when a fundamental vested right is at stake, and instead affirming on a deferential and incomplete record while disregarding material facts and deferring to agency and Attorney General arguments rather than independently evaluating the administrative record and the Tulare Superior Court rulings? (Exhibit B)

C: Did the Tulare County Superior Court err or abuse its discretion on August 20, 2024, by denying Petitioner Samreen Riaz's petition for writ of mandate in the case vc303441? (Exhibit C)

D: Did the Dental Board/DCA err or abuse its discretion by denying the August 16, 2023 reconsideration petition on August 21, 2023, and did revocation of petitioner's professional license constitute a compensable taking under doctrine of eminent domain the 5th and 14th Amendments (Boom Co. v. Patterson, 1879) (Exhibit D)?

E. Did the Dental Board of California err and abuse its discretion by issuing a mental and physical examination order under Business and Professions Code §820 on June 24, 2022- the same day the petition was filed, without prior service of the petition to ophthalmology patient prior to obtaining the order(Exhibit E)?"

F : Did the DBCA violate petitioner's constitutional and patient rights by initiating a petition mental exam without serving the petition, for a reason that an ophthalmology patient for exercising First Amendment rights?

Suggestive Answer: YES

PARTIES TO THE PROCEEDINGS

The petitioner is Samreen Farid Riaz.

Respondents is The Dental Board Of California.

Samreen
Mar 30 2016

TABLE OF CONTENT:

Question Presented	1
Certificate Of Interested Parties.....	2
Table of Content	3
Table of authorities	4
Petition	5
Opinion below.....	6
Jurisdiction.....	7
Constitution and Statutory Provision Involved.....	8
Statement Of the Case.....	9
Reason For Granting the petition.....	10
1:5th district error review Unserved Petition §820 , inadmissible evidence..	11
2: 5th district error review Section 820,822 part of the broader DPA ..	12
3: 5th district error review §2032.230(a) compliance and timely objections.	12
4:5th district error review Judge Gevin's misconduct.....	13
5a.5th district error review Board President violated Gov. Code §11517(b).	15
6:Retaliatory proceedings harming public interest.....	17
7: 5th district error review Sixth Amendment violation.....	18
8:5th district error review Misapplied clear-and-convincing burden.....	18
9:5th district error review Ignored June 20 2023 Gevin misconduct.....	26
10. 5th district error review wrongful denial of demurrer/strike motions.....	26
11. 5th district error review errors in Gevin's affirmative-defense ruling...	27
12. 5th district error review discrepancies in Hillman's 03/08 rulings ..	28
13. 5th district error :Refused review of judicial-disqualification denial.....	32
14. 5th district error review: Hillman's discovery obstruction/ involvement.	34
15. 5th district error review Denied Suppl. briefing; excessive litigation burden.	35
Verification	36
Conclusion.....	37
Certificate of word count.....	38
Attached to Petition Appendix A-E	

TABLE OF AUTHORITIES:

CASES	PAGE NUMBER
Mammoth v. Board of Public Works (1972)	Pg 05
Dent v. West Virginia (1889)	Pg 8
Miller v. Board of Medical Quality Assurance (1987)	Pg 8
Emslie v. State Bar (1974)	Pg 8
Elkins v. Derby (1974)	Pg 9
Herbert v. Lando (1979)	Pg 9
Catchpole v. Brannon, supra, 36 Cal.App.4th at p. 244.	Pg 9
Frost v state personnel board	Pg 15
People v. Cowan	Pg 17
Katie V. v. Superior Court(2005)	Pg 19
Fettgather v. Board of Psychology (2017)	Pg 25
Shelby county v holder	Pg 32
Wilson v. Garcia (1985)	Pg 28
Hernandez v Paicius	Pg 33
Strumsky v. San Diego County Employees Retirement Assoc (1974)	Pg 34
Boom Co. v. Patterson (1879)	Pg 37

STATUTES AND RULES	PAGE NUMBER
7th,4th,14th,5th,6th, 1st Amendment Rights	Pg 5
§1085	Pg 5
Universal Citation: CA Civ Pro Code § 473.5 (2020) (a)	Pg 8
Article III, ArticleI, section 1 , Article 6	Pg 6,8,9
Administrative Adjudication Bill of Rights (§ 11425.10)	Pg 9
Bus and prof code S1601.2	Pg 9
Section 2032.320(a), 2032.310	Pg 12,13,
Section 1983 claims	Pg 28
Section 820, 821	Pg 30,35
CCP §1094.5,	Pg 33
Section 2017.010	Pg 34

**IN THE SUPREME COURT OF THE UNITED STATE PETITION
FOR WRIT OF CERTIORARI :**

Petitioner filed a writ of certiorari under Rule 10(a) in the Supreme Court US because the decision below departs from settled principles governing judicial review of fundamental vested rights, resulting in structural due-process error of statewide and national importance. The California Supreme Court's denial of review (S293171, Dec. 10, 2025), the 5th district opinion (F088523, Sept. 25, 2025), and the Tulare Court's ruling (VCU303441, Aug. 20, 2024) left uncorrected jurisdictional defects, constitutional violations, and refuse to conduct independent judicial review required by §1094.5(c). Petitioner filed writ F086809 after reconsideration denied, but the 5th District declined merits review despite Article VI, §10 jurisdiction, while the Board proceeded with revocation during pending writ. Lower courts ignored that proceeding initiated without jurisdiction through unlawful §820 orders based on unserved petition §820, privileged information. Gevin asserts jurisdiction S1601.2 despite finding no DPA violation. The courts refused hear challenges to the unlawful examination order, disregarded board lack statutory authority, misapplied burdens, upheld findings unsupported by substantial evidence. This case presents federal questions involving violation of 7th, 4th, 14th, 5th 1st Amendment, due process, equal protection, judicial bias, patient/consumer/witness rights against retaliation warranting review because the lower courts resolved important federal issues in conflict with controlling authority & departed from accepted standards." §1085 permits filing in "any court", Riaz timely invoked jurisdiction as in Mammoth.

IN THE SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner prays that a writ of certiorari issue to review the judgment below.

OPINION BELOW

The opinion of the Supreme Court of California denying Petition review (S293171, Dec. 10, 2025) appears at **Appendix A** and is unpublished.

The opinion of the California Court of Appeal, Fifth District, denying Petition F088523 (Sept. 25, 2025) appears at **Appendix B** and is unpublished.

The opinion of the Tulare County Superior Court denying Petition VCU303441 (Aug. 20, 2024) appears at **Appendix C** and is unpublished

The order of the California Dental Board/DCA denying the August 16, 2023 reconsideration petition (Aug. 21, 2023) appears at **Appendix D** and is unpublished.

The order of the California Dental Board issuing a mental and physical examination under Bus. & Prof. Code §820 (June 24, 2022) appears at **Appendix E** and is unpublished.

JURISDICTION:

[x] For cases from state courts

The date on which the Supreme Court of California denied review (S293171) was December 10, 2025. A copy of that decision appears at **Appendix A**.

The date on which the California Court of Appeal, Fifth District, denied Petition F088523 was September 25, 2025. A copy of that decision appears at **Appendix B**.

The date on which the Tulare Superior Court denied Petition VCU303441 was August 20, 2024. A copy of that decision appears at **Appendix C**.

The date on which the California Dental Board/DCA denied the August 16, 2023 reconsideration petition was August 21, 2023, based on the administrative judge's proposed decision and order (Aug. 2, 2023). A copy appears at **Appendix D**.

The date on which the California Dental Board/DCA Order Denying reconsideration Petition was Aug 21 23 based on administrative judge proposed decision and Order (dated August 2nd 23). (**Exhibit D**)

The date on which the California Dental Board issued an order compelling mental and physical examination under Bus. & Prof. Code §820 was June 24, 2022, the same day the petition was filed. A copy appears at **Appendix E**.

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

CONSTITUTIONAL AND STATUTORY PROVISION:

Petitioner asserts deprivation of "life, liberty, or property, Due process, and Fourteenth Amendment rights violated (**Dent, 1889; privacy and procedural rights**)Cal. Const. Art. I §§1,6).Right to practice is both a **property and liberty interest (Conn v. Gabbert, 1999)**. DBCA compelled mental exams without notice or hearing, violating due process and rights (**Miller, 1987; Fort, 1982**). Courts reject unsupported Board findings (**Insurance Co. v. WCAB, 1981; Duke, 1988**). Fair notice guaranteed; substantive due process limits legislation (**Kavanau, 16 Cal.4th 771; CCP §1094.5; Cal. Const. Art. III §3.5**). Default may be set aside (§473.5). Article VI violated (**Fort, 1982; §11425.10**). Privacy protected under HIPAA, Patient Privacy Rights Act of 2020, CPRA (Cal. Health & Safety Code §1364.5; 3.1.1, 3.2, 3.3 Chapter 3 opinion on privacy: AMA Ethics I, IV, California Privacy Rights Act, 2020. "Appellate review requires impartial judges, independent evaluation, public confidence (**Cowan, 2010; Cromer, 2001; Freeman, 47 Cal.4th 1000-1001**), protecting federal (1st, 4th, 5th, 7th, 14th Amendments) and Ca(Art. I §7) rights. Agency can sustain demurrer for good cause like notice not served (§11520(c)); standing requires actual controversy (Art. III). Mental exams raise constitutional concerns (**Lujan, 90-1424; Himmel, 1971**) without prior-hearing breach due process (**Miller, 1987**). Courts interpret law; agencies cannot (art III, section 3.5)(**Regents, 1983**). Practice rights require clear, convincing evidence (**Conway**). Privacy inalienable (Cal. Const. Art. I §1). The board failed to convincing proof with reasonable certainty. (**Emslie, 1974; Furman, 1938**). Compensation allowed property/economic injury (**Kwikset Corp**).

STATEMENT OF THE CASE

This petition warranted because 5th District & Tulare Court ignored the mandatory independent-judgment standard when fundamental rights were at stake, creating a due-process error of statewide importance (CA Const. art. I, §1; §473.5(a); §11425.10). Petitioner, here a patient, consumer, and public, also a Muslim minority, Asian, immigrant, woman color, held good standing dental license (April 2013) not violated Dental Practice Act until Dental Board joined Cantrell breach Patient Privacy rights filed Unconstitutional mental exam petition unserved on patient before order issued. Defendant ignored motions vacate, strike, or demurrer on mental exam, violating due process, equal protection, Art 6 and the APA (Gov. Code §11425.10). Judge Gevin improperly relied on §1601.2 despite no Dental Practice Act violation showing lack of jurisdiction. Lower courts ignored Alan, DDS, Board President negligently issued orders (mental exam, Accusation, revocation) without legal authority, without board member approval, was a competitor dentist in market, had an ongoing dispute (VCU298300: 05 15 23) when issued (Accusation, revocation) order, yet, failed to recuse despite conflict. No good cause justified for exam petition beyond Petitioner's 1st Amendment activity. Retaliatory proceedings toward court witness in osha, hipaa matters harmed public interest, violating public policy (Catchpole) Hillman denied demurrer/strike defendant defense, obstructed discovery (18 U.S.C. Ch. 73). 9/25/25 ruling relied on false findings, insufficient evidence, burden-shifting on petitioner (to prove jurisdiction, service, good cause, statutory compliance.), validated unlawful §820 order, denied due process (Herbert). Misapplied tolling (Elkins; Armstrong).

Reason For Granting The Petition:

Petition warranted as Fifth District & Tulare Court ignored mandatory independent - judgment standard when fundamental rights were at stake, S1085 allows filing in any court; Riaz timely invoked original jurisdiction (Mammoth, 8 Cal.3d 269), creating a due-process error. The Court should grant Certiorari because, the California Supreme Court, 5th District, and Tulare Superior Court decided important question of law and federal questions in conflict with other U.S. courts on the same important matter, raises a DeNovo question of law for Supreme Court to make an independent determination without deference to lower courts' opinions of statewide importance (CA Const. art. I, §1; §473.5(a); Gov. Code §11425.10) including public, government importance, 1st, 4th, 5th, 7th, 6th, 4th & 14th Amendments, civil, human, racial, and ophthalmology patient rights, consumer, public member, Witness right performing public duty participated in osha hippa matters without retaliation in public safety matters (Dent, 1889), and petitioning government without discrimination, requesting to US Supreme Court make a decision based on individualized evaluation, guided by the principles of law.

The Supreme Court of California denied discretionary review — not on the merits — thereby leaving intact a Sept 25 25 5th district opinion that is in error asserting “Board” authorized under “§820” “to investigate” Riaz “not comply with the Board’s order” “Board” “statutorily authorized to revoke” “license” noncompliance is itself substantial evidence for the Board’s action: (ROA 812–813, 815–829) for following reasons:

1:Initiating petition §820 without notifying ophthalmology patient consumer and member of public based on inadmissible evidence obtained breaching patient privacy :

The Administrative Court, DBCA lacked legal authority (as failed to state act or omission upon which it can proceed). Art. II and jurisdiction over ophthalmology patient/consumer (Kees v. Med. Bd., 1992) in initiating petition by obtaining inadmissible privileged patient information without consent from Cantrell ophthalmologist (in violation S 1601.2, S2000), breach Patient Privacy Rights(Act 2020), CPRA, HIPAA (Doe, 2017), CMIA §1364.5, Ch.3 privacy rules 3.1.1,3.2,3.3, AMA Ethics I, IV. Sept 25 5th district opinion “not comply with the Board’s” §820 “Order” not “substantial evidence” for issuing 820 mental exam order where Wallace(, fraud: violated §§1600, 1601.2,due process) failed to serve petition 820 before obtaining intrusive mental exam order §820.(Art. I §1: §473.5(a); §11425.10) (Fort; Miller)(ROA 546-563,568,807-812,224). Until petition 820 properly served, legally valid, and challenged or resolved through lawful challenges cannot support a “noncompliance finding”. Here § 820 cannot be invoked to constitute grounds for the suspension or revocation under § 821 because 5th district relied on unlawful disputed order S 820 (Lack jurisdiction) as a basis for revocation while concealing above facts, and in violations of due process, §473.5, §§11505, 11520(c), 2032.310(c), and without independent fact-finding (Fort; ROA 216- 224, Exhibit B pgs 215-220, 662-667 226-228, 229-284,312-359). Lower courts ignored argument of Unlawful Application of a Statutory Provision on Ophthalmology Patient in Accusation (ROA 546-563,568-588, 683-695).

2: Section 820,822 part of the broader Dental Practice Act: which includes various regulations , statutes starting at Section 1600. Proceedings under S 821, 822 cannot be conducted in accordance with Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government Code as Judge Gevin acknowledge that “Complainant did not prove respondent violated the board’s licensing act” ”complainant did not prove respondent violated the dental practice act” (ROA 683-695; 551-560/ S293171 petition pgs 30-32) . Section 1601.2 does not authorize harming ophthalmology patients through §820 investigations absent any Dental Practice Act violation(clear convincing evidence ability to practice safely is impaired). Section 1601.2 governs licensing, regulatory, and disciplinary authority, not investigatory proceedings.Section 820 addresses investigatory functions and does not authorize license revocation or discipline. Lower court and Judge Gevin made legal error, exhibited bias, failing to present fact fairly that S 1601.2 not asserted by the Doj or board but judge gevin invoked §1601.2 sua sponte, misapplied §1601.2 on ophthalmology patient.

3: 5th district ignored Compliant with CCP §2032.230(a) and concealed timely objection to 820 examination order based on unserved Petition:

Sept 25 5th district opinion ignored petitioner’s challenges to Gevin’s June 20, 2023 decision “ “complainant proved that in 06 2022, the board issued and served an order compelling mental and physical examination of respondent to evaluate her fitness to practice safely”(ROA 867--930: S293171 B pgs 28)) “ based on tipin” “confirmed respondent not complied with the 820 order” where petitioner showed Gevin concealed petition was served to ophthalmology patient after the order

issued, not before. Petitioner argued complainant cannot bring accusation refuse submit exam when petitioner compliant with CCP §2032.230(a), concealed timely objection to 820 order before filing of an accusation via defense/motions with Admin Board, DBCA, DOJ, Consumer Board, which were never heard (ROA773,662-667,672-696, 459-462, 462-483,484-517,,226-359, S293171 Br. 23-27) where Petitioner objected to bad-faith, retaliatory, discriminatory accusations ((in violation of 2032.310,2032.310(a)) based of disputed mental exam order issued based on unserved mental exam petition issued beyond scope of authority by Sara Wallace, violating 473.5, S1600, violating due process, equal protection, Art. 6 (§11425.10), and depriving fair proceeding.(See Notice, defense,strike, vacate July 6- sept 06 22 ROA 535-591, 538-543,485-490, 490-493,491-517, 549-550, 812-813, 815-829). DBCA not authorized under §820 to investigate ophthalmology patients/consumers or members of the public. Therefore S 820 cannot be invoked to constitute grounds for the suspension or revocation of the licentiate's certificate or license." (§ 821.) and in violations of due process, CCP §473.5, §§11505, 11520(c), 2032.310(c), and without independent fact-finding (Fort; ROA 216- 224, Exhibit B pgs 215-220, 662-667 226-228, 229-284,312-359).

4: 5th district ignored Judge Gevin Misconduct:

5th district ignored judge Gevin improperly relied on §1601.2 of the dental practice act " contrary to public safety and welfare to allow her to maintain license." (ROA 1 873) despite no DPA (sect 1600) violation showing lack of jurisdiction when Judge Sean established Patient/consumer/member patient " did not" "violated the dental practice act" (ROA 3971-3976, 3982; 2330, 874, 549-550,874), failed to

address Dental Practice Act codified in §§1600–1976 and S820 included within the broader statutory framework that governs dentistry practice. S820 is not authorized absent Dental Practice Act violation. §820 cannot independently create a violation; without a Dental Practice Act violation, the Board has no independent power to act under §820. Because no Dental Practice Act violation occurred, Board action was unlawful and outside its jurisdiction because authority depends on actual statutory violation. Provisions Dental Practice Act not applicable to ophthalmology patients, consumer and member public who did not violate dental practice act. 5th district erred deeming “Board acted lawfully” in “revoking” because. Judge Gevin ruling based on S1601.2 of dental practice act (S1600) despite finding not to violate dental practice (Lack jurisdiction).

5th district failed to address and allow Just compensation for property deprivation when ruling tulare superior court found erroneous on timeliness:

Fifth District erroneously upheld “alternative denial” finding Board’s actions lawful, if supposedly accurate (when in fact based on false fact finding, hillman bias, discovery obstruction) still failed to address 5,14 Amendment compensation protections including property deprivation. 5th district avoids deciding whether appellant alleged controlling authority (e.g., Boom Co. v. Patterson, revoking license—property based on sua sponte invoking of §1601.2 “contrary to public safety and welfare to allow her to maintain license.” (ROA 1873 : although lacked evidentiary support) caused economic loss—was an uncompensated taking, denying due process, equal protection; Therefore, all appellate costs and just compensation

should be awarded to the ophthalmology patient.

5: Board President Misconduct and Violation Govt Code Section 11517 (b):

Lower courts ignored Alan, DDS, Board President negligently (without legal authority that authorize him to solely) issue orders (mental exam June 24, 2023, Accusation, revocation) without board member approval. Fifth District concealed Accusation was brought while demurrers, motions to strike, set aside mental exam order were pending (see ROA 459-517, 3959,) but never presented to the board members for voting filed on July 6 22, July 22 22(ROA 881-928, 535-591). 5th district disregarded that Judge Hillman failed to establish that the dental board and Alan violated Section 11517(b) (see the report of the council, page 23, title: The hearing officer cannot rule on the motion. The board is not present. He must therefore of necessity recess the hearing, report the matter to the board, which must in turn be convened for the purpose of passing on the motion: When such a motion is made, the hearing officer must report the matter to the agency board. The board must then be convened to pass on the motion. This ensures that the decision is made by the appropriate authority: Frost v. State Personnel Board.): without hearing evidence,disregarding adaptation of the rule of the Morgan v. United States, did not follow the Judicial Council's proposal for agency control and Morgan principles, exceeding authority, violating due process, rendering actions unlawful and void. 5th district ignored, Alan, a market-competitor dentist with an active dispute (VCU298300: 05 15 23), issued the Accusation/revocation order yet failed to recuse, violating Tumey/Cal. Standardbred Sires by allowing private interest to influence a regulatory decision; violating impartiality, due process therefore acting

unlawfully in revoking license.(ROA 812–813, 815–829). Specifically, the Decision and Order dated (June 20th 23 , August 2, 2023, signed by Alan ROA l 696–742, Petition Reconsider); contained discrepancies ignored by lower courts. No good cause (violated section 2032.220) mentioned for the exam petition other than Petitioner's 1st Amendment activity, witness in osha and hipa matter in re Berry (1968) (ROA 809-810, 812–813, 815-829) . The Fifth District erred: “not comply with the Board's” §820 “Order” is not substantial evidence for issuing a §820 mental exam order.

5th district ignored AG Email exam “ could not contest” denied due process: Fifth District erred in opinion “ We agree.”Board's Actions Were Lawful “ “revoking” “license” . 5th District's characterization Riaz “consistently assailed””the order” shows bias toward petitioner by recasting lawful motions, objections as aggressive attacks when concealed material ophthalmology patient received email from Attorney General that Petitioner's motions objecting mental exam “ could not contest the Board's order with motions or a request for a hearing” (AR 0227, ROA 3959,226–395, 773,662-667,672, 459-462, 462-483,484-517, 535-591, July 6,22 2022 and sept 06 22 ROA pgs 881-928,)),denying full-hearing procedural rights before making final decision,Denied due process and equal protection under APA §§11425.10, 11517(b),refusal prevented present evidence. By refusing to hear demurrer, motions to strike, and set-aside motions, Board exceeding powers statutory authority , acts are voided (Id. at p. 544, citing Rich Vision Centers), violated 14th Amendment violation,—specifically, no §11505 notice for the intrusive §820 exam, improper §11520(c) default, and denial of §11425.10 and CCP §473.5 protections, violating Cal. Const. art. I §1 (ROA 224, 219–223). The Fifth District's

opinion showed bias by concealing material facts and misstating law, disregarding Frost and Morgan rule providing fair hearing with all admissible evidence considered in the presence of appropriate authority that is the entire board. Therefore the underlying §820 order was unlawful, lacking jurisdiction, unconstitutional, procedurally flawed, biased, cannot constitute ground for application 821. Unlawful, due process violation Order Cannot Automatically Trigger Discipline. Neither the Board nor the complainant had jurisdiction over the patient/consumer/member of the public who did not violate the dental practice act. Compliance cannot be legally required for an unlawful order.

6: Retaliatory Proceeding Harmed Public Interest, Violate Public Policy:

Sept 25 5th district opinion ignored facts on Retaliatory proceedings toward court witness disclosing osha, hipaa matters, Federal welfare funds misuse at FQHC harmed public interest, violating public policy (case vcu276991- ROA 809).(People v. Cowan 2010 ; Catchpole). Sept 25 5th district opinion ignored petitioner's challenges Judge Gevin's June 20, 2023 decision: Tippin "He confirmed.. respondent not compiled with the 820 order" (record on appeal 871) where Judge Gevin failed to consider in a legal conclusion (ROA 491-502) that DBCA failed to investigate reported misconduct of Tippin —retaliatory date of unannounced visit to ophthalmology patient private residence coinciding with April complaint against Cantrell. filed by ophthalmology patient, failure to allow ophthalmology patient's attorney to respond.(6th amendment violation), harassing conduct, misrepresented himself as police office, refused to leave private property when requested (4th amendment violation), shouted, struck door (in violation 18 U.S.C. §§1512 (witness

tampering) and 241 (conspiracy against rights), Tippin's breached patient privacy by obtaining unconsented privileged information from ophthalmology patients ophthalmologist (ROA 491-502, 696-742), failed considered motion Strikes Demurrers to 820 and Accusations.(ROA 459-461,462-517,544-628, 662-667) .Therefore S 820 cannot be invoked to constitute grounds for the revocation of the license. (§ 821.), in violations of due process, CCP §473.5, §§11505, 11520(c), 2032.310(c), and without independent fact-finding (Fort; ROA 216- 224, Exhibit B pgs 215-220, 662-667 226-228, 229-284,312-359).

7: Sixth Amendment Violation:

Lower courts ignored petitioner's challenges June 20, 2023 Gevin decision misrepresenting respondent's testimony "Respondent appeared, declined to testify because ..not represented by counsel"(ROA 871) where Judge Gevin concealed key facts regarding denied appellant's request to allow appellant attorney to review newly introduced documents from defendant during the hearing and request of proper service, violating due process, show bias, improper service (ROA 871, 881-928; S293171, pp. 23-27). Ignored facts that Ophthalmology patients May 18, 2023 continuance request despite good cause, extraordinary circumstances denied along with evidence attorney Kathy and mosses stopped responding calls, email: held May 22 hearing without opportunity to be represented by attorney, violated 6th Amendment, due process and fair hearing rights. Also DBCA issued documents that were not under the respondent's name.

8: "Complainant bears" "burden by clear and convincing evidence" :

The Sept. 25 Fifth District opinion is erroneous because it ignored petitioner's challenges to Judge Gevin's June 20, 2023 decision (ROA 881-930), where petitioner argued Gevin acknowledged "complainant bears" "burden by clear and convincing evidence" ((Ettinger; Katie V.; ROA 872)) to prove petitioner's mental incapacity to practice dentistry safely (Emslie, 1974; Cooper, 1996 , yet failed to find that burden unmet despite expressly finding the complainant "did not prove respondent violated the board's licensing act" or "Dental Practice Act" (§1600 et seq.) (ROA 874, 812-813, 815-829). Appellant argument and evidence ignored(ROA 684-689, 695, 873, 881-924). The lower courts ignored that Gevin's ruling was legally erroneous and rested on a post-hoc, sua sponte invocation of §1601.2 "public protection" to justify suspension based on Tracy's 8/17/22 accusation (ROA 217-224), even though the §820 order was disputed and unlawful. They further ignored that the defendant never asserted §1601.2 and that Gevin wrongly claimed "clear and convincing" proof (ROA 684-689, 695, 873) while admitting no Dental Practice Act violation—rendering §1601.2 inapplicable because it is part of the same Act and cannot apply absent a proven violation, as Gevin himself confirmed ("the licensing act relevant to respondent is the Dental Practice Act," §1600 et seq.). Gevin's denial of cost recovery under §125.3(a) because the complainant produced no valid evidence of any licensing-act violation (Ex. A 114; Ex. C 328; S293171 34-35) further confirms the agency failed to meet the required clear-and-convincing burden.

5th district opinion Board acted "lawfully"; "Board" authorized under "§820" "to investigate" ignoring equitable relief challenges invalid §820 order : issued without

timely notice (CCP §473.5); the order relied on Cantrell's retaliatory, privacy-violating misconduct(outside the provider role, malicious after being reported for negligence, retaliating, denying care, and unlawfully disclosing patient information—violating the §2000;ROA 269-768,491) rendering the evidence inadmissible, legally void, cannot meet the clear-and-convincing burden support issuance of a §820 exam.The trial court relied on disputed, unlawful, privacy-breaching evidence, not undisputed facts requiring de novo review.

Fifth District ignored Cantrell complaint has no evidence of unsafe-practice of dentistry by petitioner, instead showing exceptional circumstances: Fraud, retaliation, confidentiality breach, harassment, discrimination, civil-rights violations of petitioner.(ROA 219-224,303-359). Nowhere stated in .§820 ophthalmology patients who did not violate dental practice act cannot reach Congressman, Government Authorities, Courts for discrimination, harassment, retaliation concerns, hatch act violation or for reasons facing court proceedings impediment.Exercising civil rights not a legal basis applying §820; not good cause or a clear convincing substantial evidence"("so clear..leave no substantial doubt" that ophthalmology patients who did not violate dental practice act ability to practice safely is impaired (ROA 219-224, see brief S293171 pg 117). §820 legal function is not to revictimize individuals reporting police misconduct, civil-rights violations or rely on unlawfully obtained medical thru patient-confidentiality breaches; such use is unconstitutional.

The Fifth District erred by asserting the Board was "authorized under §820 to investigate," ignoring that Tulare court failed to require Wallace to meet the

clear-and-convincing burden to show valid, good cause, reasonable legal basis applying 820 or regarding ophthalmology patient health other than discrimination, retaliation, harassment, and impeding court proceedings in violation of public policy complaints.(1st amendment violation).

(ROA485-490,538-543,668-671,807-812,224).

The Fifth District erred by labeling Riaz merely “an individual,” concealing she was an ophthalmology patient, consumer, and public member who committed no Dental Practice Act violation, enabling regulatory overreach by treating disputed “noncompliance” as evidence despite the Board’s lack of §820 jurisdiction—undermining due process, harming protected categories, and shielding DOJ/Board accountability.

Using a disputed, invalid §820 order as “noncompliance” evidence prejudices the challenge and improperly treats a contested procedural step as misconduct, even though §821 requires clear-and-convincing proof of actual wrongdoing. The Fifth District ignored petitioner’s motions strike/demurrer showing the complainant failed to state any “cause for discipline” under §821 in the Accusation (ROA 219–224, 303–359, 690–768, 296–742, 696–768).Fifth District”a Riaz “not “ ‘challenge” “merits underlying such an order without” “submitting”“examination” wrongly conflated procedural compliance with authority, ignoring §820 lacks jurisdiction is a valid objection can raised independently. It further erred by upholding revocation despite the Board’s lack of jurisdiction.

Considering “noncompliance” itself substantial evidence for the Board’s action” on 820 Mental Exam order issuance is in error as reasoning legally unsound, it does

not justify legitimate basis for issuing a mental exam .§820, is not a disciplinary statute and confers no jurisdiction to apply it to an ophthalmology patient. Further Invalid, lack jurisdiction, unconstitutional, unauthorized, without legal authority or disputed §820 mental exam order cannot be utilized as a basis as “clear and convincing evidence” of “noncompliance” under §821. Petitioner showed the complainant failed to provide clear-and-convincing proof or any lawful basis to request a §820 psychological exam of an ophthalmology patient/consumer (ROA 217–224, 226–228, 229–284, 215–220, 225, 662–667, 672, 326, 773; S293171 pp. 32–33).

Riaz Provide Clear and Convincing Evidence related to the Petitioner/Ophth Pt. consumer member of public health: Although unserved Mental-exam petition, was primarily based on ophthalmology pt/consumer/member of public exercised First Amendment rights, reporting harassment, discrimination based on skin color (ROA 809–810), Petitioner still provided competent evidence Psychologist Meadow’s February 2021 report confirmed harassment, discrimination, violence, and retaliation tied to Petitioner’s court filings against federally supported health centers (Ex. A, ROA 551–560), further testimony Dwight Sievert, MD specializing in psychiatry, confirming that the plaintiff is psychologically fit April 2022). (ROA 252-256,257, 551-560,226-228,229-284,429-434). Therefore the complainant failed to show, good cause, reasonable basis, clear and convincing evidence or legal basis applying §820 (ROA 364–369, 435–438, 219–224). The Fifth District ignored that the Dental Board abused its discretion on June 24, 2022 by granting a §820 order without reasonable cause, no substantial evidence that an ophthalmology patient/consumer and public member—who never violated the Dental Practice Act

was unable to practice dentistry safely.

The Fifth District's Sept. 25, 2025 opinion stating "Riaz fails on the merits" is erroneous. Instead of conducting independent-judgment review or determine whether agency findings were supported by evidence under §1094.5 when administrative decision substantially affects fundamental vested rights (301 Ocean Ave: Shapell); the court simply adopted the Attorney General's urges, mainly on Board's evidence/arguments presented—"The Board largely repeats its arguments on appeal," "Board's revocation order supported by the evidence," and "we also agree with the Board that its actions were supported by the evidence.", reflects govt/political influence rather than independent appellate review, and not reviewed trial court error ruling..It failed to recognize the trial court's improper burden-shifting in finding "Petitioner has not met Petitioners' Burden that the Administrative Findings are Contrary to the Weight of the Evidence," which treated an ophthalmology patient's dispute of a §820 order as "noncompliance" under §821 without first deciding threshold legal question on jurisdiction of unserved petition over ophthalmology patient or requiring the Board's clear-and-convincing showing. The Fifth District never established that the Board met its substantial-evidence burden to justify the §820 order, revocation, or related rulings(including jurisdiction, constitutional, legal authority and cause to apply 820 under dental practice), affirmed an incomplete denial without independent record review, violating due process

Fifth District admitted the petition was not untimely yet failed to reverse Hillman's "untimeliness" ruling (record of appeal 4509), failed to correct the improper burden shift, skipped the Board's obligation to justify its §820 authority, jurisdiction,

whether board met substantial evidence test.

Fifth District wrongly applied “substantial-evidence”(Fukuda) test instead of independent-judgment review §1094.5(c) when fundamental vested right practice dentistry was affected by the revocation.

The Fifth District recognized Rule 8.486(a)(1), Mammoth, and former Rule 56(a), which require a petitioner to explain why a writ should issue “as an original matter,” and acknowledged the Supreme Court’s policy that courts decline original jurisdiction absent “exceptional” circumstances. Yet it disregarded the documented exceptional facts—confidentiality breaches, civil-rights violations, retaliation, harassment, and conflicts (ROA 219–224, 224, 303–359, 459–517, 662–667, 672, 773, 824). Despite jurisdiction, the court failed independent-judgment review under §1094.5(c).

The Fifth District erred and abused discretion in declaring “We agree” the Board’s actions were “lawful” and “revoking” the license. Its claim that “noncompliance is itself substantial evidence for the Board’s action” misstates the record:the Board improperly treated a pending proceeding as proof of noncompliance. The court wrongly held Riaz could “not challenge” merits “without submitting” examination” , though F086809 accepted jurisdiction. By ruling “fails on the merits” without correcting F086809’s denial, ignoring §1085 permits filing in “any court”. Riaz timely invoked original jurisdiction consistent with Mammoth. It unlawfully deemed revocation “lawful” contradicting rule 8.486(a)(1), Article VI, section 10.substantial-evidence review did not apply when no genuine fact finding occurred at trial level. (see brief S293171pg 119) , depriving ophthalmology patient fair merits review, violate due process amid agency escalation with

license revocation on Oct. 13, 2023 during pending review (Sept. 7-Oct. 26, 2023; ROA 3007-3010, 3009) show bias and unequal treatment under law. Therefore, Fifth District's opinion Riaz "never contended she complied" mischaracterizes record; Petitioner did not violate §821.

In addition Fukuda v. City of Angels (1999) not a similarly situated case : involved a police officer on paid leave, City met its burden based on an undisputed finding, involved uncontested, lawful evidence and no due-process challenge. By contrast, Riaz, an ophthalmology patient who committed no Dental Practice Act violation, faced a Board that failed its clear-and-convincing burden, relied on inadmissible Cantrell evidence (ROA 683-695), notice violations, improperly shifted the burden to Riaz (McMillen; Graham; Shapell), and issued a jurisdictionless §820 revocation pending court challenges causing harming her career and economic stability. Fukuda's findings were undisputed; Riaz's were false, misleading, and objectively incorrect.

The Fifth District wrongly found Riaz "fails on the merits" by inaccurately comparing her case to Fettgather v. Bd. of Psychology, which is not similarly situated.: (See S293171 pgs 125-127) : Ophthalmology patient/consumer did not violate dental practice act, received no notice or interview before issuance §820 order. Unlike Fettgather Plaintiff never disagreed to meet for scheduled interview. Board investigator never requested a scheduled interview, failed to set up an interview to set up an appointment for an interview ophthalmology patient/consumer/member of public, medical records unlawfully obtained without consent, §820 order issued the same day without jurisdiction or due process, making Fettgather inapplicable.

Independent-judgment review requires weighing all evidence and determining

abuse of discretion, not accepting agency “noncompliance” characterizations as substantial evidence. (See other pending challenges strike, demurrer, vacate ROA 535-591, 538-543, 485-490, 490-493, 491-517, 549-550, 812-813, 815-829). By failing independent review, violated §1094.5(c); ignored the procedural and constitutional protections when fundamental rights are vested.

9: Additional Judge Gevin June 20 23 Misconduct:

Lower courts ignored Petitioner’s argument that Judge Gevin’s June 20, 2023 decision contained material discrepancies, misidentification—Judge Gevin knew the name ‘Samreed Farid Rinz’ was not the name of Samreen Farid Riaz at the hearing (ROA 696-742; S293171 Br. 22-23; Ex. C; ROA 676-680)—rendering his opinion factually unreliable, defective, denying due process. Judge Gevin’s showed prejudice, one-sided and inaccurate facts that are not true depiction of facts and omitted material facts (Ex. C; ROA 681-742; S293171 at 23-27) where petitioner showed the complainant violated Article 3 and CCP §§2032.310, 2032.310(c), 2032.320(a), 2032.220(d), and 2016.040 in seeking an unlawful mental/physical exam (Ex. A; ROA 216-224).

10: Lower court failed to review Judge Hillman wrongly denied Plaintiff’s demurrer/motion to strike(430.20, FR 12(f), Rule 3.1112(a) defendant defective Affirmative defense in July 2024 ruling:

Lower court disregarded that Tulare Court failed to strike conclusory, fact-free, insufficient, inadequate, not met pleading standards, lacked evidentiary

support, defective, failed to state cause of action affirmative defenses.(ROA 2651–3329; S293171 pg 81-84) and improperly shifted the burden to Petitioner. See Petitioner's verified FAC and exhibits show first–sixth affirmative defenses were defective and insufficient (Heller Fin. v. Case , Midwhey Powder Co., (7th Cir. 1989). The Fifth District relied only on Respondent's 2 reasons but ignored Petitioner's argument altogether (See on S293171 brief pg 81,82 :ROA 2277-22), misapplying review; independent-judgment, not substantial-evidence, review governs when a fundamental vested right is at stake.

11: Sept 25 25 5th district court ruling error disregard Judge Gevin generalized legal conclusions on Affirmative Defense:

Judge Gevin issued unsupported conclusions—"evidence doesn't support defenses" and "objections rejected" (ROA 873) without citing specific facts or evidence. He relied on partial fact-finding , misapplied law, ignored admissible evidence supporting objections (ROA 696–742) despite admitting "complainant did not prove violations" (ROA 881–924) and omitted Petitioner's filing (ROA 518–524, 538–544).," Declaration and Opposition statement", and constitutional objections to "Request for Discovery" citing Shelby County and Citizens United (ROA 518–524, 538–544) Petitioner argued no jurisdiction over an ophthalmology patient, using inadmissible evidence and challenged the Accusation through demurrer, strike, notice, and defenses 1–8 (§11506(a)(5)) (ROA 536–537). Gevin rejected defenses on incomplete facts (ROA 696–742); Petitioner objected to discovery and §11507.6 sanctions, noting Judge Sean found no §12.53 or Dental Practice Act violation.

12: Lower court ignored Judge Hillman's March 12 , Aug 20 rulings

Discrepancy in Authority & Analysis :

Hillman ignored material pleading facts, essential elements sufficient to constitute CAS, and judicially noticed evidence (Mathews v. Becerra (2019) patients privacy right under constitution. Lower court ignored Judge Hillman's Error in Legal Standard: Hillman failed to accept alleged facts as true, misapplied statute of limitations, and denied independent-judgment review required under CCP §§1085, 1094.5, violating fundamental vested rights (Ord v. De La Guerra, Tielsch v. Anaheim). The lower court in error failed to find abuse of discretion when the weight of the evidence fails to support the findings.

5th district ignored Claim involves § 1983 actions: Lower courts ignored discrepancies in fact-finding, authority, and analysis (§0312) contrary to Topanga Ass'n, 11 Cal.3d 506, misapplied §§11522–11523 in the March 12, 2024 and August 20, 2023 rulings (Bixby, 4 Cal.3d 130), and failed to address that the claims arise under §1983 (Bivens, 403 U.S. 388; Felder v. Casey, 487 U.S. 131; Howlett v. Rose, 496 U.S. 356 and involve agency action without jurisdiction (S293171 at 21–32)(Frost, 29 Cal.App.5th 986) .

Statute of limitations Code of Civil Procedure 1094.5 is 90 days:

Hillman misapplied Statute of Limitations & Tolling: Collaterally attackable anytime (Elkins; Armstrong)—based on false fact-finding (Wilson v. Garcia

1985), Reason for error rulings was Hillman personally involved in the controversy of the case, still failed to recuse, violating due process (Catchpole).

Lower Courts Failed To Apply Independent-Judgment Standard:

Although Fifth District admitted, the Board erred in claiming mandamus must filed under CCP §1094.5, citing Mammoth, 8 Cal.3d 247, 269 and found November 13, 2023 writ timely because F086809 tolled statute limitations “We do not find Riaz’s petition untimely,” based on F086809—it nevertheless affirmed the trial court’s untimeliness ruling (Sept. 25, 2025, pp. 2–3; ROA 4505, 1282) without remand, on an incomplete record, thereby denying mandatory independent judgment review under §1094.5(c) affecting a fundamental vested right and affirming a non-merits “without prejudice” decision. The Fifth District acknowledged the trial court’s original jurisdiction over administrative mandamus, yet inconsistently required §1094.5 in F086809 and later deemed it unnecessary under Art. VI §10 in F088523, reflecting delay, obstruction, lack of judicial economy, and retaliation against an ophthalmology patient, consumer, public member, and protected class: minority woman of color, immigrant, Muslim (0.2% Asian descent) (ROA 219–224, 303–359). Hillman denied petition “without prejudice”, did not rule on merits; but 5th district affirmed a procedurally incomplete decision. . Sept. 25, 2025 opinion “fails on the merits” is legally erroneous; the Board “Revocation” of license on Oct. 13, 2023 during pending judicial review, depriving petitioner of due process.

Instead of independent review, the Fifth District adopted the Attorney General’s (defendant party not neutral authority) assertion of unidentified “superior” authority “urge” 5th district to affirm on “untimely and its revocation

order was otherwise supported by evidence” undermining judicial neutrality and independence. Denial silenced petitioner’s challenge to defective record, undermining appellate review.

AGENCIES ACTED WITHOUT JURISDICTION:

Fifth District ignored Hillman’s biased, partial, one-sided fact-finding only in the context to strengthen opposing counsel contention, omitted material facts pleaded by Petitioner in the March 12 ruling and other Rulings (S293171 at 59–81).

Lower Court failed to take Judicial Notice Requested under Evidence Code §452 for RJN 1–12 from Jan 16 24 fillings(ROA 217–224, 1228–1230).

Lower court ignored Lack of Service and False Notice Claim : lower court ignored petition alleged document “Notice of Default Decision and Order” attached as Exhibit F was not served or produced to Petitioner other than as Exhibit F on Dec 29 23, further “ Board notified petitioner by first class and certified mail” referencing letter(Exhibit F) is not accurate information (DOj attorneys misleading court to gain an unfair advantage) and unsupported by the record.(RJn 1,2,3 ROA 1230,1228, 217-224).

Petitioner Did Not Violate §821, 5th district opinion is mischaracterization "Riaz has never contended she complied” and misleading: Lower Court ignored Petitioner alleged not “refused to comply with” “ board””examination” order but timely challenged §820 on July 6 22 via motions strike, demurrers, July 21 22 motions vacate (see requested RJN 4,5,6 on Jan 16 24) before accusation filing, show lawful challenge, participation and not noncompliance or refusal, and On Sep 06 22 filed

Motion strike, demurrer accusation and thru Petition reconsider ((see jan 16 24 requested RJN 7). —never refused compliance (ROA 1229).Therefore Sept 25 5th district opinion “not comply with the Board’s” §820 “Order” is not “substantial evidence” for issuing 820 mental exam order. Considering “noncompliance” itself substantial evidence for the Board’s action” on 820 mental exam order issuance is in error. (See ROA 224, 226–228, 229–250, 251–284, 459–462, 462–483, 484–517, 662–667, 672, 824.).

Also she acted in full compliance with the legal process to contest the disputed order, see No. F088523 petition filed 2 2 25 pg 20 clearly stated “The complainant cannot bring accusation ..when ophthalmology Patient/Petitioner was in ..§2032.230(a) refuse to submit to the demanded examination, for reasons specified in the motion to demurrer, motion to strike and motion to vacate filed by ophthalmology patient/respondent by serving copies to all the parties in a in a timely manner.(see Exhibit A pgs 13-15,16-37,38-71, record on appeal pgs 226-228,229-250,251-284)”.

820 requires compliance only with lawful orders not blind obedience; board and court errored treat asserting legal rights as defiance or noncompliance evidence.Appellant challenges are active participation, not refusal , not heard on merit, cannot serve as “substantial evidence” of noncompliance under § 820 , are not protective but punitive when there was no substantial evidence of actual unfitness.

Material Admission Omitted: lower court ignored Gevin’s admission “complainant” “not prove respondent violated” “ Dental Practice Act” (ROA 2457).

Lower Court ignored Hillman Mischaracterization: Hillman omitted Petitioner's argument that August 21, 2023 "Order Denying Reconsideration" triggered a timely writ within 60 days, instead misstate record, presented partial fact that petitioner arguing Oct 13 23 is a final order in march 12 23 ruling .(ROA 1239-1224), resulting in false finding, prejudicial dismissal.

.Lower court ignored Hillman Pattern of Flawed Fact-Finding in Hillman's March 12, 2023 ruling: harm self-represented litigant.(See specific facts S293171 Br pg 85) and denied impartial lower-court review.(Shelby County; Citizens United).

13: Denial of Disqualification of the Trial Judge reviewable on Appeal :

Fifth District ignored Petitioner's due-process bias claim, refused to review denial of an impartial tribunal, and misapplied independent review despite clear evidence of judicial bias.(Mayfield; Catchpole; Murchison; Cowan; Cromer) . 5th District failed to take judicial notice of (i) June 11, 2024 filings :evidence Entry of default entry 4/29/24 vcu398300 (ROA 2282-2294, 2597-2649, 792-793, 3307-3319) showing Hillman's was witness, co-conspirator, had bias, personal interest toward petitioner (S293171, pg. 84); (ii) disqualification motions (§§170.1, 170.6) documenting obstruction and delay: June 18, 2024, pressuring not file documents, May 22, 2024 ordered only plaintiff serve not defendant to administrative hearing (ROA 2155,1 2160-2188, 2258-2262), evidence of issuing rulings repeated parroting defendants disputed facts, concealing actual facts, deliberate bias in VCU303441 .(ROA 2277- 2279 , 2238-2244 : See S293171 brief Pgs 86-89); which revealed actual bias and structural error and above Extreme facts establish due-process error. (Chapman v. California,, People v. Abbaszadeh) affecting appellant's

substantial rights, judicial integrity, and trial structure, such that failure to reverse constitutes a miscarriage of justice. The Court of Appeal failed to assess the constitutionally intolerable risk of bias where Judge Hillman's personal interest, witness/co-conspirator in appellate cases, refusal to recuse, extrajudicial knowledge, and obstruction created a high probability of actual bias. Despite extreme facts—Hillman as witness/co-participant, flawed fact-finding, obstructed discovery in self preservation and denial of an impartial tribunal—the Fifth District refused independent review, contrary to binding precedent requiring objective evaluation of bias (Caperton; Hernandez; Schmidt). Hillman's vested personal interest created "extreme" facts showing actual bias (Hernandez; Scott), Court of Appeal refused disqualification review despite public policy grounds, "public interest" (9 Witkin §315), and documented bias toward right of ophthalmology patients, consumers, member of public, court witness in public safety matters, religious discrimination (0.2% Muslim), whistleblower retaliation with goal to preventing exercising first amendment right, obstruction (18 U.S.C. §1512(c)(2)), civil-rights violations (Catchpole), rise to the level of 'extreme facts' under Schmidt — requiring appellate scrutiny to protect judicial integrity, constitutional due process and equal protection. The Fifth District erred by ignoring that review protects not "only party rights" but "public confidence in the judiciary" (Freeman; Curle) and that merits review of judicial-bias claims serves the public at large, especially where the record documents judicial misconduct. Judge Hillman's refusal to recuse and issuance of erroneous rulings, denial discovery and refusal strike defective defenses (5/22/24, 7/30/24; ROA 2155, 4101) tainted the judgment. Fifth District compounded the error by failing independent review under CCP §1094.5

and Strumsky.

14: Fifth District ignored Hillman's discovery obstruction (18 U.S. Code Chapter 73), affirming June 18 24 "Motion to Compel Production of Records," denial without providing valid legal basis, ignored Hillman personally, directly and indirectly involved in the controversy of this case:

Fifth District ignored Hillman's failure to make findings and his refusal to address Petitioner's May 3 and June 17 2024 discovery requests (ROA 2205-2276, 2553).

5th district failed to take requested judicial notice section 452 of Minute order issued on June 18 24 on (ROA 2277-2279), and Petitioner's June 18 declaration in support affirmative-defense, record-lodging, and discovery issues and Extraordinary

delay in writ decision for no good cause (ROA 2160-2188, 2258-2262, 3327,

2651-3305). Defendant withheld non-privileged information as subpoena specifies redact personal information, discoverable admissible evidence of discriminatory

retaliation toward protected class. (Pacific Tel. & Tel. Co. v. Superior Court,

§2017.010. Specifically reason Recorded in DBCA for mental exam petition was that the brown patient filed grievances of discrimination based on her skin color with

consumer(medical) board regarding medical board licensee white ophthalmologist(

ROA 485-490,538-543,668-671). Defendant objections were generalized, insufficient

under 2031.210, no motion to quash filed establish subpoena validity and waiver of

objection. On June 18, 2024, Petitioner requested Hillman's recusal during hearing,

made comment judge hillman not interested in any discovery process, causing delay,

, discovery obstruction after judge hillman mentioned he will deny motion to compel

..(Herbert v. Lando (1979): discovery can be exploited to the disadvantage of justice.

"Court notes that the records filed within this case have been deemed

Administrative Record.” Plaintiff Motion Hearing – Compel Production of Records
 And 2) therefore limit record by denied discovery, failed to sanction subpoena
 defiance, obstructed evidence amid whistleblower retaliation and bias.(as judge
 Hillman has conflict of interest (take judicial notice complaint vcu 298300 pg
49,paragraph 362 and pg 48) with petitioner, show prejudice, violate due process
 against warrant certiorari.

15: Fifth District “denied” “supplemental briefing”, showing bias, abuse,
ignoring extraordinary circumstances: Excessive litigation refusing merits
 review F086809 despite jurisdiction Hillman recuses failure , false findings,
 improper timeliness rulings, discovery obstruction, action without jurisdiction.

Based on all above fact the DBCA, 5th District Case F086809, F088523 , and Tulare
 Case VCU 303441 each left unresolved conflicting issues of law and fact, resulting
 in violations First, Fourth, Fifth, Seventh, and Fourteenth Amendments and
 affirming disputed, speculative., fabricated, concealed, partial findings unsupported
by law or substantial evidence without the independent review required for lawful
 revocation. 9/25/25 ruling relied on false findings, insufficient evidence,
 burden-shifting on petitioner (to prove jurisdiction, service, good cause, statutory
 compliance.), validated unlawful §820 order, denied due process warrant reversal.
 Therefore, Petitioner, as ophthalmology patient, consumer, and member of the
 public has special and beneficial interests protected through the writ, with broader
 impact on public safety, patient and consumer rights, civil rights, and government
 accountability. Lower courts failed to examine full record and evidence for fairness,
 reasonableness, proportionality in the overall scheme of the law(Shelby County v.
 Holder and Citizens United v. FEC, the Court’s) relied on fabricated or concealed

facts of record to reach (erroneous) decision without a jury See also specific facts and citation in Section A-E of Legal standard on pg 10 -16of Brief S293171.

VERIFICATION: I, Samreen Riaz, declare under penalty of perjury that I have read the Petition, the stated facts are true and within my knowledge, and this

verification was executed on the 29 day March 2026 in Visalia, California.


March 29 26

Conclusion

Based on Above, This Court (1); Reverse S293171 (10 10, 2024) without merits review, leaving jurisdictionally, constitutionally unlawful orders intact.(2); Reverse 09 25, 25 F088523 ruling upholding unlawful §§820–821 actions without notice, hearing, authority violated §11517(b)(c), ignored jurisdictional and due-process challenges, relied on false fact, inadmissible evidence, improperly shifted the burden to the patient, approved unilateral Board president decision making, and denied judicial review.(3); Vacate Tulare Superior Court's 08 20, 24 denial of writ mandate and 08 21, 23 denial of reconsideration filed Aug 16 2023. (4); Vacate Alan 08. 2, 2023 solo order issued without board approval despite conflict as competing dentists.(5); Vacate June 20, 2023 AJ Gevin order based on accusation basing on §820 unlawful no jurisdiction order and 06 24, 22 §820 mental/physical exam, issued without notice to ophthalmology patient who violated no Dental Practice Act. (6); Vacate 08 13, 23 revocation notice pending writ (1084-1097) (F086809:09 7 23- 08 26 23) and Vacate, remand Fifth District order for independent merits review of prior writ refusal, failed to undertake despite jurisdiction(Art. VI, 10).(7); "Reinforce patient, consumer, public member dental license & compensation for property, economic injury. Boom Co.; Kwikset Corp. 8: Compel discovery, disqualify Hillman, order DBC, DCA, DOJ investigate, press charges for press charges for conspiracy, HIPAA/ privacy violations, and retaliation against petitioner.

Samreen

Samreen

Samreen Riaz, pro per litigant : March 29 26