

No. 260-439

IN THE
Supreme Court of the United States

**KERRY PATRICK RAHEB and
RENEE L. HOUSTON,**
Petitioners,

v.

JAMES COLGATE JEROME, JR.,
Respondent.

On Petition for a Writ of Certiorari
to the Supreme Court of Vermont

PETITION FOR A WRIT OF CERTIORARI

Kerry Patrick Raheb
Renee L. Houston
Petitioners Pro Se
281 Forest Hill Drive
Hinsdale, Massachusetts 01235
KRAHEB@ICLOUD.COM
516-220-9886

QUESTIONS PRESENTED

1. Whether the Due Process Clause of the Fourteenth Amendment is violated when a state court enters a judgment exceeding \$320,000 against individuals without a trial, without a jury, and after denying them any meaningful opportunity to present evidence or cross-examine witnesses.
2. Whether a state court's denial of relief under Rule 60(b) constitutes an abuse of discretion, and a violation of due process, when the record contains clear evidence of judicial bias, retaliatory litigation, and fraud regarding the existence of an easement.
3. Whether a judge's participation in multiple overlapping civil and criminal proceedings against the same parties—including extending stalking orders without hearings, imposing a nearly year-long curfew, and removing firearms from the victims of a shooting—creates an unconstitutional appearance of bias requiring recusal and vacatur of the resulting judgment.

LIST OF PARTIES

Petitioners are Kerry Patrick Raheb and Renee L. Houston. Respondent is James Colgate Jerome, Jr. There are no corporations that are parties to this proceeding.

RELATED PROCEEDINGS

Supreme Court of Vermont, *James Jerome, Jr. v. Kerry Raheb and Renee Houston*, No. 25-AP-383 (entry order issued May 8, 2026).

Superior Court of Vermont, Bennington Unit, Civil Division, *James Jerome, Jr. v. Kerry Raheb, et al.*, No. 22-CV-00175 (partial summary judgment Sept. 10, 2024; findings and order on damages July 9, 2025; denial of motion to vacate Oct. 15, 2025).

Superior Court of Vermont, Bennington Unit, Civil Division, *Kerry P. Raheb and Renee L. Houston v. James Colgate Jerome, Jr., et al.*, No. 25-CV-04921 (separate action for intentional infliction of emotional distress; pending).

TABLE OF CONTENTS

Questions Presented	i
List of Parties	ii
Related Proceedings	ii
Table of Contents	iii
Table of Authorities	v
Opinions Below	1
Jurisdiction	1
Constitutional and Statutory Provisions Involved	1
Statement of the Case	2
Reasons for Granting the Petition	5
I. The Vermont courts denied Petitioners due process	5
II. The Superior Court's refusal to vacate under Rule 60(b)	6
III. Judge Barra's overlapping proceedings created an appearance of bias	7
IV. The retaliatory character of the lawsuit supports review	8

Conclusion	8
------------------	---

APPENDIX

Appendix A — Opinions and Orders Below

.....	1a
A-1 Vermont Supreme Court Entry Order, No. 25-AP-383 (May 8, 2026)	1a
A-2 Superior Court Decision on Motion (Apr. 5, 2022)	8a
A-3 Superior Court Sanctions Order (May 10, 2024)	13a
A-4 Partial Summary Judgment on Liability (Sept. 10, 2024)	22a
A-5 Findings and Order on Damages (July 9, 2025)	26a
A-6 Denial of Motion to Vacate (Oct. 15, 2025)	38a

TABLE OF AUTHORITIES

Cases

<i>Caperton v. A.T. Massey Coal Co.</i> , 556 U.S. 868 (2009)	7
<i>Williams v. Pennsylvania</i> , 579 U.S. 1 (2016)	7

Constitutional Provisions

U.S. Const. amend. XIV	1, 5
---------------------------------	------

Statutes and Rules

28 U.S.C. § 1257(a)	1
V.R.C.P. 60(b)	1, 3, 6

OPINIONS BELOW

The Vermont Supreme Court's decision affirming the denial of Petitioners' motion to vacate is unpublished and is reproduced at Appendix A-1. The Superior Court's orders entered in conjunction with the judgment sought to be reviewed are reproduced at Appendix A-2 through A-6.

JURISDICTION

The Vermont Supreme Court entered its judgment on May 8, 2026. This Court has jurisdiction under 28 U.S.C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

The Fourteenth Amendment to the United States Constitution provides in relevant part:

“No State shall ... deprive any person of life, liberty, or property, without due process of law”

Vermont Rule of Civil Procedure 60(b) provides in relevant part that a court may relieve a party from a final judgment for fraud, misrepresentation, or other misconduct of an adverse party, or for any other reason justifying relief from the operation of the judgment.

STATEMENT OF THE CASE

Petitioners Kerry Patrick Raheb and Renee L. Houston purchased a 12-acre property at 1172 Bluestone Road in Bennington, Vermont. The title

search conducted at the time of purchase revealed no easement in favor of Respondent James Colgate Jerome, Jr. or his properties.

Within months of Petitioners moving in, Respondent began a sustained campaign of harassment. On September 5, 2021, Respondent illegally entered Petitioners' home, verbally threatened them, attempted to physically assault Mr. Raheb while visibly intoxicated, and had a white substance caked on his nostrils. He returned to the property multiple times that same day with additional individuals.

The harassment continued for years and included:

- Assault on Petitioners' minor son on March 4, 2023, during which Respondent used a plow to destroy the entrance to Petitioners' property and nearly ran over the child;
- Repeated trespassing, vandalism, and surveillance by Respondent and his associates, including his childhood friend and neighbor Peter Geannelis;
- Geannelis later shooting at Petitioners (for which he was criminally charged);
- Stealing Petitioners' mailbox multiple times;
- Coordinated social media attacks; and
- Business interference claims that were factually baseless.

Respondent's wedding venue business (Hubble Homestead) is located on West Road, not on Bluestone Road or Mount Anthony Road. Respondent maintains a fully paved private entrance on Mount Anthony Road. The property at

350 Mount Anthony Road is zoned residential. Nonetheless, Respondent claimed that Petitioners' actions on their own property interfered with his business.

After Petitioners obtained a temporary stalking order against Respondent, that order was dismissed. The very next day, Respondent served Petitioners with the civil lawsuit that underlies this petition. The lawsuit was filed immediately after the stalking order was removed.

The case proceeded before Judge David Barra. Judge Barra had already been involved in multiple other proceedings involving Petitioners, including:

- Arraigning Mr. Raheb on multiple felony charges that exposed him to approximately 37-40 years of incarceration (all of which were later resolved by plea agreement removing the felonies, and which have since been expunged or sealed);
- Extending stalking orders against Mr. Raheb without any hearing and without transcripts of the original proceedings;
- Granting and extending a stalking order in favor of the individual who had shot at Petitioners;
- Imposing a nearly year-long curfew requiring Mr. Raheb to be home by 9:30 p.m. despite knowing he operated a business in another state that closed at 8:00 p.m.; and
- Ordering the removal of Petitioners' firearms after they had been the victims of a shooting.

Petitioners repeatedly sought Judge Barra's recusal. Those requests were denied.

The Superior Court granted partial summary judgment on liability without a trial or jury. The matter then proceeded directly to a damages hearing at which Petitioners did not appear. Petitioners' nonappearance was due to the recent death of Renee Houston's father and the lack of counsel. The court awarded Respondent \$320,792.77.

Petitioners moved to vacate the judgment under V.R.C.P. 60(b)(3) and (6), presenting evidence of fraud regarding the claimed easement, the retaliatory timing of the lawsuit, the pattern of harassment, and Judge Barra's bias. The motion was denied. The Vermont Supreme Court affirmed on May 8, 2026.

Throughout the proceedings, court documents continued to be mailed to Petitioners' former address in Williamstown, Massachusetts, long after the court was aware they had relocated, causing repeated delays in notice.

As a direct result of the overlapping civil and criminal proceedings, Petitioners were forced to sell their Vermont home and leave the State. They have since relocated to Massachusetts.

REASONS FOR GRANTING THE PETITION

I. The Vermont courts denied Petitioners due process by entering a massive judgment without a trial or meaningful opportunity to be heard.

The Due Process Clause requires notice and a meaningful opportunity to be heard before a person is deprived of property. Here, liability was determined by summary judgment and damages were assessed in a proceeding at which Petitioners were absent for reasons of family emergency and lack of counsel. No jury was ever empaneled. The resulting judgment exceeds \$320,000.

This Court has long held that due process is violated when a party is deprived of a meaningful opportunity to present a defense. The procedures employed here fall far short of that standard.

II. The Superior Court's refusal to vacate the judgment under Rule 60(b) was an abuse of discretion.

Vermont Rule 60(b) exists precisely for situations involving fraud, misconduct, or other extraordinary circumstances. Petitioners presented evidence that:

- No easement existed according to the title search;
- Respondent's business was not located on the relevant road;
- The lawsuit was filed the day after a stalking order against Respondent was dismissed; and
- The same judge who entered the judgment had a long history of adverse rulings against

Petitioners in related matters.

The denial of relief under these circumstances constitutes an abuse of discretion and warrants this Court's review.

III. Judge Barra's pervasive involvement across multiple related proceedings created an unconstitutional appearance of bias.

This Court has repeatedly held that due process requires an impartial tribunal. See *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009); *Williams v. Pennsylvania*, 579 U.S. 1 (2016).

Judge Barra simultaneously:

- Presided over the civil case that produced the judgment at issue;
- Handled multiple stalking-order proceedings involving the same parties;
- Extended stalking orders without hearings;
- Arraigned Mr. Raheb on serious felony charges; and
- Imposed severe pretrial restrictions, including a lengthy curfew and firearm removal.

The cumulative effect of these overlapping roles created an objective appearance of bias that due process cannot tolerate.

**IV. The retaliatory character of the
underlying lawsuit further supports review.**

The civil action was filed immediately after Petitioners' stalking order against Respondent was dismissed. Combined with the documented pattern of harassment that preceded the lawsuit, the timing strongly suggests retaliation. State courts should not be permitted to insulate such judgments from meaningful review.

CONCLUSION

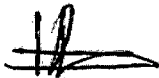
For the foregoing reasons, the petition for a writ of certiorari should be granted.

Respectfully submitted,
*[Signature pages of Kerry Patrick Raheb and Renee
L. Houston follow.]*

**IN THE SUPREME COURT OF THE UNITED
STATES**

Raheb & Houston v. Jerome

Respectfully submitted,



**Kerry Patrick Raheb
Petitioner, Pro Se**

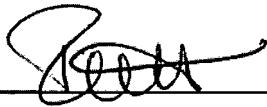
**281 Forest Hill Drive
Hinsdale, Massachusetts 01235
KRAHEB@ICLOUD.COM
516-220-9886**

Date: _____

**IN THE SUPREME COURT OF THE UNITED
STATES**

Raheb & Houston v. Jerome

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Renee L. Houston', is written over a horizontal line.

Renee L. Houston

Petitioner, Pro Se

281 Forest Hill Drive
Hinsdale, Massachusetts 01235
KRAHEB@ICLOUD.COM
516-220-9886

Date: _____