

ORIGINAL

SUPREME COURT OF OHIO

Chong Hao Su APPELLANT : Ohio Supreme court

Martha W Lee : Case No: 11-0108

VS : pro bono publico

Ohio Cincinnati city APPELLEE : Case No: C100609
Ohio first district appellate court

Brief of the constitutional challenge

MEMORANDUM

Chong Hao Su APPELLANT

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Cincinnati city APPELLEE

Prosecutor office

Room 202 Cincinnati city Hall

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FILED
JAN 19 2011
CLERK OF COURT
SUPREME COURT OF OHIO

The judgment is formulated with a view to maintaining the national basic economic system and the economic order of the market, clarifying the ownership of property, giving full effect to the meaning of property, protecting the obligee's property ownership rights, restoring property economic role in accordance with the Ohio Const.. Signature: 苏崇豪 李慧娟

Chong Su

Martha Lee

I DELEGATION OF AUTHORITY AND EVIDENCE

People are hard to file the constitutional challenge. Thus the unconstitutional ordinance has existed. Please give the chance to review the case for the uniform Federalism sake. The delegation of authority is conferred on this Court by judges' office oath and the patriotic duty and the following law: Ohio appeal law Section. 8.03 ordains no limitation for the appeals involving Substantial Constitutions issue¹. 28 U.S.C. § 1331 and 1343(a)(4) and 42 U.S.C. §§ 1981 and 1983 and Supremacy Clause and Ohio Const. 8 and §16 and "Habeas Corpus Act"² and USC §2241 and the Judicial Precedent "Hamdi V. Rumsfeld"³. II INTRODUCTION.

III THE JUDGES NEED NORM OF LAW AND THE CONSTITUTIONAL CONCEPT.

IV The CBC conducts the warrantless search and seizure for the CBC execution.

In opposition to the above law, Cincinnati city annuls the key point of the power supervision and control. Since the above law is in the way. The doors are always locked. The law prohibits a warrantless search and seizure for a building inspection and has impeded the CBC execution. An architect can prove that the CBC and orders were completely irrelevant to the public exigency. A jury certainly reverses the charge and the CBC according to Ohio Const. §19. The below facts and defense history prove that the city and judge were at its wit's end. **This is the background of the abolition of the law.** Thus the city advisedly actively got rid of the constitutional limitation for remove of the barriers. Judge's potency screens the removal. Hereby the CBC "Sec. 1109-19. Severability." incurably ordains to annul all law and courts role for the CBC execution. There are the several key difference between the CBC and th2 Const.. The all No.2 CBC is derived from the abolition of the laws and democracy. **The mandatory nature of "Severability" section, in tandem with the other CBC, direct an inspector to create a series of the comprehensive discriminative novel criminal law, property law and sanctions relating to the warrantless search and seizure and the double penalties by an inspector unrestricted arbitrary discretion hereunder. In the effect and fact, the ultimate authority rests with the CBC and the inspector. "Sec.1101-**

¹p126 Appellate practice and procedure in Ohio.

² *United States [1867]*

³ 542 US 507(2004)

47. Personal Liability and Indemnity” reinforces the discharge of the rebellion of such CBC without the personal liability.(annex P1) The judges, by implementing the CBC, supported the breaking into inspection and twice convictions. The aftermath invalidates the public power operation institutionalization without the democratic characters. Thus the inspector had the privilege over law with the three branches power. He could break into for the unconstitutional search and seizure; moreover can push the aggrieved middle class toward incarceration, and impose the double criminal punishment based on no nexus to the criminal law and property law. As a result of the differences, the CBC exercise unlawfully banished people out of the city. Without the above restraints, the CBC enforcement overall effect is to defy laws, human and divine for the autocratic tyranny. The abolition of law destroys the entire system of the constitutional restraints on which the property of the people rest without the background security. Otherwise the CBC does not need to nullify all of law and court function. Otherwise the warrantless breaking into search and seizure could not possibility happen three times. The CBC is the histrionic scenario as follows.

V The city broke into seizure and search for warrantless inspection three times.

In 2007, Chong Hao Su just purchased 1818-1824 Race building and obtained the building resident permits in Cincinnati city Ohio. The majority of the buildings were vacant. On 4/25/07, the city building inspector Jim demanded inspection. Chong Su asked Gov. employee ID and the law-enforcement identity certification. Inspector Jim refused and broke into seized Chong Su during an unlawful search of his home and tenants homes and vacant buildings. On 4/26/07, the city charged Su with obstruction of the business performance in Cincinnati court of Hamilton county Ohio. Cincinnati court No:07/CRB/14561. The inspector issued the orders for the CBC violation correction.

The vague orders had not the concrete violation location and violation scope and degree without an architectonic norm. E.G: Is a violation in the vacant buildings or our home or a tenant home? Thus no company could offer letter. To hire the repair companies needs the repair permit. The orders concerned the antinomy of the different CBC hereunder. Thus the owners visited the inspection office for the administrative interpretation to the vague orders ; moreover paid money for the repair permit application and administrative appeal application. The city refused all of them without the refundment and explanation. **Without the permit, the repair is crime.** No one managed the concerned complaint. The

applicants had no chance to say the difficulty for sale of the building.

On 9/25/07 inspector Jim repeated the above breaking into for inspection. Under the police report, the warrantless arrest is the preventive arrest for the inspection without the body contact and conversation when Chong Su was far from Race building. Next day the city filed the M2 charge for obstruction of the business performance. Cincinnati court case No: 07/CRB/37093. Owners Chong H Su and Martha W. Lee were accused of not complying with the orders on 10/1/07 (Case No. 37452 and 37453). The orders and indictments and police reports and the public record system notably proved neither public exigency nor warrant for the inspections and arrests. On 10/5/07, police Elsaesser Donald and Hill Derrick, supported the trespasser to break into and occupy Race building. The purpose was to obtain the evidence at the city' back. Since inspector Jim evicted the tenants and closed the building without warrant. The tenants refused his entrance. The vacant apartments were locked. Thus the city needed the evidences for the conviction. Cincinnati court refused to accept the litigation against the police men. The applicants had to move in Kemple house. Cincinnati city repair permit granted a year for safe Kemple house repair from 6/25/07-7/25/08. The city "Case History and Report" proved to finish the some repair works. On 12/17/07 before the permit deadline (7/25/08), the owners stood the trial for not complying with the orders. The city broke into again to arrest the owners inside the home for a minor misdemeanor charge report under neither a warrant nor public exigency condition. (Cincinnati court Case No.: 07/CRB/47126 and 47126). The city action embodied the mutinous CBC.

VI JUDGES ANNUL PROPERTY LAW FOR THE NOVEL PROPERTY LAW EXECUTION.

The good No. 1 CBC", the section 1101-57. and 1101-63.3 and 1101-63.4 and 101-57.6, commands to eliminate a public exigency and close the building straight away. The city has to record the elimination in the public record system, included the building record and inspector work record. The owner pays the cost. The CBC Sec. 1117-13. until 1117- 61.2. (No.2 CBC) command to decorate and perfect every portion of a safe vacant building and vacant Lots and residence. The CBC "Sec. 1117-07.1 General and 1119.01.4 Scope" and "1119-01.5" stipulate every part of a building and a lot shall be maintained in good repair. Such as: the indoor painting color, visibility of the home inside, interior walls peeling, unclean flaky, all accessory and appurtenant and trash, etc. The CBC enacted a sweeping set of the vague mandates for the comprehensive mandatory sanction. The CBC

stipulates a violation is seemed to be serious hazard, then the building becomes hazard. Hence, the different painting color can cause the serious hazard. The Sec. "1101-51.Penalties" authorizes legislative power and jurisdiction power to an inspector. It is impossible to fulfill the sweeping vague orders mandates within half year. The CBC refused the alternative option and the negotiation. Then all the victimized owners (belong to the middle class) stood twice convicted of not to abide by the orders.(Annex P10 & 1) "No. 2 CBC" from the CBC Sec. 1117-13. until 1117-61.2, are not for the public Exigency on the face of its word. "No.2 CBC" applies to the concrete interior building substance within a private safe home. The orders and indictment and the city "Case History and Report" quoted the "No.2 CBC" and embodied the six months waiting and did not mention any thing in the alleged evidences. They and repair permit and the police report and public record system never mentioned the public exigency and warrant. All of them were not for the public use and the public interests and did not concerned the habitability restrictions. "Silverman V. United States"⁴ prohibited to alter Reasonable Expectation of privacy- homes. Hereupon the CBC Sec. 1201-23 Existing Buildings and Sec. 1101-15.6 do not ask the existing building to meet new building standard. On the contrary the CBC and its orders abound in the comprehensive demands to perfect a safe vacant building and vacant Lots and residence. The CBC orders annulled the previous inspection record and the building resident permit and the historic existence building Code. Essentially the CBC exercise is desuetude of the property ownership and extinction of exclusive property utilization and disposition rights against the title deed and private ownership regime protection without Due Process procedure. Property Law refers to the property right definition in the exclusive rights enjoyed by the oblige to directly control specific properties including ownership, property utilization and disposition rights etc. Distinctly the CBC orders rescinded the large areas owners fundamental ultimate property right and liberty rights and the tenants' usufructs against their willpower. It is the similar possessory action. (possessorium). British

⁴365 U.S. 505 (1961)

Maxim holds: Rain and wind can go into a poor home except King (the City). The city granted the exclusive title deed to us. Thus law punishes a trespasser. The exclusive ownership of personal property by citizen is ownership in indivision. To usurp the exclusive property right by the criminal punishment precisely is the constitutional taboo power. Amendment 14th distinctly prohibits any legitimate state law to deprive people of liberty and property. The rights of property and liberty are essential ingredients of the 4th and 14th Amendment and Ohio Const. §19. The 2 Const. secure the property right freedom from the unreasonable searches and seizures, through warrant and Due Process dictates. "Mapp V. Ohio" objected to use the home for conviction in detail Ohio Const. § 19 and B1anchard V . Department of Transp held ...the government may only exercise its power of eminent domain when the property is to be put to a public use and when a public exigency requires it. ME CONST . art. I , §21;..."⁵ The equivalent of the orders fairly is the involuntary payment and involuntary servitude for the city willpower. E.g. The city convicted people for their refusing the up to date garments(to perfect home). So Ohio Const. §6 prohibits such condition: "...nor involuntary servitude, unless for the punishment of crime."

VI. Judges execute the CBC to deprive the middle class of Due Process right. In reviewing the executive branch' decision, the dispute at law are: whether the CBC and its orders are subject to the constitutional process. Whether the constitutional process and democracy obstruct the public management performance. what the are processes due? (4) whether the city orders are validity.

¶ The CBC violated the specific law legislative procedure without the constitutional notice to the aggrieved middle class at the back of judges. The CBC conflicts with and otherwise stands as an obstacle to the full purpose and objectives of Ohio Congress in creating the uniform criminal law and property law. According to Ohio Const. "**Article II: Legislative**", the any conflicting proposed amendments to the constitution shall be approved at the same election by referendum vote of the

⁵798A . 2d 1119 Me. , 2002

electors and the notice before and after the enactment. The City had to publish the announcement and the time limit for a historic Existing building renovation in the building record and public record system and in a newspaper. The city has to cancel the building resident permit firstly through the Due Process procedure, then can enforce the CBC. But the city failed to do the above without enacting clause and the notice before and after the enactment. The owners association never received notice of the No.2 CBC requirements.

2 The CBC and its orders violate overbreadth doctrine and the first essential of Due Process law. They have not the accurate architectural norm for correction and **have not an ascertainable adjudicative material fact for guilty.** Essentially the city **created the novel criminal law for the CBC enforcement.** The evidences are the indictments which were the same with the orders in the court record system. ... "Anderson v. City of Issaquah." 6 strike down the vague CBC. The CBC and its orders violate overbreadth doctrine and were the layman norms. In addition No.2 CBC contradicts the existing historical building codes and the previous inspection records and the residential building permit.

3 "It is elementary theory that all police power enactments, no matter at what level of government, must conform to the basic state constitutional requirements of substantive due process and equal protection of the laws." "Southern Burlington County N.A.A.C.P. v. Township"⁷ The orders execution was typical administrative Gov. actions to which the administrative appeal and Due Process and a jury process and an architect identification procedure apply. 4 "18 The question before the Court in Bi-Metallic was "whether all individuals" have a constitutional right to be heard before a matter can be decided in which all are **equally concerned.**"⁸ Conversely, the Sec."1101-51. Penalties" ordains that an inspector orders are law norm for twice convictions prior to the administrative appeal and judicial review. Additionally the CBC annuls jurisprudence and the courts role. The judges prohibited to discuss the novel criminal law legitimacy. Thus the executive branch usurps the two branches' power. In fact and effect, the

⁶: 70 Wash. App. 64. 851 P. 2d 744 (1993)

⁷ 67 N.J. 151; 336 A.2d 713; 1975 N.J. LEXIS 181

⁸ "Steven J. HARRIS, V. COUNTY OF RIVERSIDE" 904 F2d 497

orders become the novel criminal law. Inspector Jim Curee has not competence mandate for the legislator and umpire. By simply giving a legislative moniker, his shoddy actions become legislative acts prior to applying the adjudicatory hearing and Judicial Review. His unconstitutional vague orders sidestepped the due process dictates to become the double sentences law. The crux of the issue lies in giving nonlegislative person the power to create and define the double convictions norms without the check and balance. Additionally the double penalties affirmed that the CBC countermand the law and court role. A tail wags the dog with manipulanda. Thus the city sidestepped the due process dictates to abrogate property right by simply giving their actions a legislative moniker. The CBC "Appeal Sec 1121-17.2 and 1101-81" invalidate the administrative appeal essence and purpose to strength the novel law enforcement.(annexP7) The appeal commission members should be jury composition principle. The appeal sections ordains that an inspector director decides an appeal decision and the prerequisite to the appeal can't abolish the CBC and orders; additionally stipulates the city to designate the appeal commission composition(members). There is no appeal guarantee system. Thus the city can usually revoke an adjudicatory hearing to the people. Thus the city deprived people of the property and liberty before Due Process procedure. **5** The motions cited the below judicial precedents with the evidences copy. The four charges were the completely consistent with the judicial precedents: "Mapp V. Ohio"⁹ suppresses all warrantless evidences. "Camara V. Municipal Court"¹⁰ prohibit penalty for rejection of warrantless inspection. "Ohio arrest, search and seizure by Lewis R. Katz" emphasized warrant for the executive administration and prohibited warrantless breaking into arrest for the misdemeanor one charge notice. Amendment 5th and Ohio Const. prohibit the double penalties. "Wilson V. city of Cincinnati"¹¹ struck down all of Cincinnati city vacated building codes and prohibited to criminalize an owner. Applicant filed the three constitutional challenge motions against the CBC, excepted "No. 1 CBC": Thus Cincinnati Judge Richard Bernat and Ted Berry and judge Brad Greenberang **willfully prohibited to say the defense and** forbad the jury trial motions. The complaints and motions and Interlocutory Appeal application claimed **jury trial** and defense rights in the

⁹ 367 U.S. 643 (1961)

¹⁰ 387 U.S. 523(1967).

¹¹ (Ohio 1976) 46 Ohio St.2d 138

competent organizations, as evidence. Then Judge Richard Bernat and Ted Berry transferred their cases to judge Brad Greenberang. After Race home was vacant and foreclosure, Judge Brad stubbornly rejected the jury trial and prohibited saying the defense for the double convictions in the secretive trial and the absent of attorney with racial discrimination. Judge Brad refused the applicant appeal application to suspend the judgment until the appeal result.

VII CLAIM FOR THE EQUAL SURVIVAL RIGHT AGAINST DISCREMINATION LAW.

"The question of whether a citizenry has adequate and sufficient housing is certainly one of the prime considerations in assessing the general health and welfare of that body." The city has the humanitarian **liability** for the housing supply.. "Census data: US poverty rate hits 14 percent in 2009." They need the shelter for survival. The original unconstitutional search and seizure and the consecutive due process violation refused the alternative option and compromise proposal on purpose. Thus the innocent middle class become the enemy from the initial without the background security. The CBC lacks a postponement clause when the orders limitation is expiration. The city has refused the postponement. The city' repair permit grants 12 months. The CBC violation accusation ought not to be just half year or before the repair permit expiry. Since the middle class had the job and family. The sweeping demands fulfillment is impracticability within half year. The foregoing law struck down all of the vacant building code and prohibited to criminalize the middle class. The convictions were after Race home was vacant and foreclosure. The CBC violation is the minor misdemeanor charge under the Sec. 1101-51.2. The city broke into seizure for the accusation notice without warrant. For the above, to say that men suspected of crime have rights to protection against the warrantless arrest and vague evidence and twice penalties, but that the middle class and tenants not suspected of crime, have no such protections, are a fantastic absurdity. The numerous renovation fund and bulky maintenance fee for the orders execution are much beyond the limited rent cost. The management becomes actual expropriation and violation of 5th Amendment under Property Law "Hotel and Motel Ass'n of Oakland V. City of Oakland" .12 Thus the city deprived the middle class of the buildings economically viability and Property interests. The comprehensive impracticable mandatory urgent demands disrupted the middle class priority and resources that focus time and energy on the job for survival. To maintain a job and building existence confronts the

¹² 344F . 3d 959 C . A . 9(Cal .)

increasingly fierce social Competition. Many companies do not allow the criminal charge procedure or record. The middle class limited time and money were depleted through the criminal litigation produce. The criminal procedure is punishment. The endless seizures and criminal procedure generated the loss of the job and a normal job possibility. The irreparable great injury to the owners is much beyond the orders benefit. The double penalties brought about loss of the properties and investment. The applicants lost the ten buildings and all investment. The endless mental stimulation and the much seizures resulted in the ischaemic heart disease to the applicant. The female owner gets the mental disorder illness. The city resulted in the unconstitutionally taking of the properties and economic viability under violation of law. The city stubbornly threw good money after bad money to kill cow without milk (property tax). The orders enforcement can't possibility substantially advance legitimate Gov. interests without an economic beneficiary. In fact and effect, the CBC enforcement excluded the owners and their tenants from living in the city. Essentially the CBC prohibits the inexpensive house subsistence. **But they aren't the only category of persons barred from so many municipalities by** reason of restrictive similar regulations. We have reference to young and elderly couples, single persons and large, growing families not in the poverty class and the poverty class in the other areas. **In the connection, the court should, therefore, consider the case from the wider viewpoint that the effect of the CBC execution has been to prevent various categories of persons from living in the city because of the limited extent of their income and resources or believed social incompatibility.** Thus the building management aftermath destroyed the management objectives and the legitimate legislative purpose. The applicants represent the people seeking their equal survival right. If te city restore constitutional process the city can avoid the loss of the both parties. The misjudgment rescinds Property Law economic role and deters building buyers from the purchase. For the above particularity, the city ought not to refuse discovering a compelling substantial city interests and the alternative options and a legitimate concrete legislative fact for the CBC constraint. Judge Brad prohibited the applicant saying USC §1983 and the 14th Amendment...etc.

VIII the city transgressed its legislative competence to promulgate the CBC.

The city incurably overstepped its authorization to promulgate the CBC. Const. and Congress prohibit that the legislative, executive, and judicial branches

encroach upon each other and dictate that the legislative power is vested solely in the senate and assembly. The delegation doctrine allowed the legislature to focus on the "fundamentals" of a law and left to the city task of "filling in the gaps" by promulgating rule to administer the law. "... but reserved the legislative right to repeal or alter the delegation (which we take it means repeal or alteration in whole or in part)"¹³. The city Gov. is trusted and has the liberal rule-making discretion. Because of the demands that modern economic and governmental conditions place on the city. Notwithstanding the city may exercise their police power in building management that is for the public use and public exigency, but it does not mean that the city can create the novel Criminal law and Property Law and the discrimination law to rescind the private ownership regime and law role. Ohio Const. §10 formulates Criminal law. Criminal law and Property Law inhere in the essential ingredients of the 2 Const. by nature. In our constitutional system, they, as Federal law, have preeminent authority over the CBC . They are hardpan of the local ordinance. This authority derives from the numerous acts of the 2 Congresses. US Const. Sec. 10 prohibits a state "pass any Bill of Attainder, ex post facto Law, or Law Impairing the obligation of contracts,etc." Supreme Clause and Ohio Const. §26 prohibit any incompatible provision. Enabling Act and delegation doctrine (legislative veto) terminate power delegated to the chief executive or disapprove particular exercises of the power by him or his agent since 1930. Delegation doctrine and legislative veto reflect an affirmative decision by the two Congresses to prohibit the city to develop the patchwork. Wherefore the city, as a executive agent, should act within its mandate and competence and legitimate legislative purpose, the local ordinance should pass constitutional muster under the delegation doctrine. Under Ohio Const. Article II, the place and benefit of the **minor** surrogates ought not to be higher than the place and benefit of their representative main body. The delegates(servitor) have not privilege to stealthily encroach their constitutional master property and liberty by moniker of the management. The borough can't strike down the federalism. Thus the borough has no the administration privilege over law. Otherwise where is the power of Const. restriction and prohibition? Otherwise the Civil War and the Amendment 14 have of no value.

Conversely, the city obdurately enacted a **sweeping set of the CBC** to strike

¹³ "Southern Burlington County N.A.A.C.P. v. Township"¹³

¹³ 67 N.J. 151; 336 A.2d 713; 1975 N.J. LEXIS 181

down jurisprudence and jurisdiction role and stealthily undermined the constitutional master livelihood in **despite preeminent authority of the Congresses and the delegation norm**. The legislature never abdicates its responsibility by allowing the inferior law to rescind the parent act. Since the denial of the law and jurisdiction function denies the legislature. On account of the separation of the powers doctrine, no legislature granted the city' delegated authority to strike down the enabling act. The above law prohibits that the CBC- the lower jurisdiction law conflict with the higher Jurisdiction law- Property Law and Criminal law. The city has no empowerment to promulgate the above CBC; additionally violated the legislative procedure to promulgate the CBC. Thus the CBC is invalid.

By reason of the aforesaid, the CBC is the notable discrimination law and the novel property law and unfamiliar criminal law. The mutinous CBC exercise effectively essentially is preempted by the 2 Const. and Property law and Criminal Law through operation of the singular CBC. Thus the contrary CBC transgressed alegislative purpose rule; additionally conflicts with and otherwise stands as an bstacle to the objective of US and Ohio Congresses. The city incorrigibly expressly invades the Congresses sovereignty. Nature of the CBC is the criminal infringement of freedom and title. Thus the city deliberately unconstitutionally took people properties. The CBC has caused and will continue to cause irreparable and substantial harm to the people equal survival basis. The CBC execution has impeded the real estate economic development and brought about the highest rate of the unconstitutional search and seizure and unemployed. Essentially the city and judges nullify the democratic essential ingredients: institutionalization of the public power; people participation institutionalization and institutionalization of the equal participation. It is beyond control that the city annuls the above law. According to the former middle class defense, our motions submitted the law and "**Brandeis Brief**" fact. But the city still incurably prosecuted the CBC to convict us after Race home was vacant and foreclosure. Notwithstanding the unconstitutional ordinance are the ubiquitous. But the other municipalities

stealthily implement the few illegal ordinance and dare not to blatantly promulgate a decree to defy Const. and the federal law. Their violations do not affect people survival. But the CBC blatantly direct disestablishes the 2 Const. and the Federal Law without the fig leave. The point is the public announcement for the rebellion. More surprising than the city is the incorrigible blatantly resistant habit. In effect, the city' systematical active whole rebellions, by the entire city Gov. system enforcing, actually become the underground resistances and the independent country treacherous acts. The rebellions have damaged the private ownership system and split the uniform 2 Const. and Federalism in front of the nations. The city commits the contempt of US Congress and Ohio Congress.

Additionally the city violated of the commerce clause and committed the common law cheat. Const. prohibited any state to violate Contract Clause and prohibited "impairing the obligation of contracts,...". The 2 Const. protect the common assurance and residence permit and the repair permit, when the city does not revoke them. If a vender does not introduce a building true condition to buyer, the vender bears the blame for the cheat. The city sold Kemple house to us and granted the common assurance and residence permit and the repair permit. Without cancellation of a grant, the city convicted us for the public exigency pretext. If a bargainer receives money and refused the service without the refund, law punishes the bargainer. After the city received our 2 applications fee payment, the city neither returned our money nor gave the repair permit and appeal notice for Race home. The city supported the trespasser to smash the door and occupy our home. The nations have no such conducts unbecoming to take the money without obligation and credence under moniker of law. Pursuant to the "stream of commerce theory"¹⁴, the city has to compensate for its cheat.

Based on the foregoing, the CBC existence manifests Judge Greenberg notably suppressed people defense for the management advantage privilege over "Bill of Right" and Const.. Admittedly this is resurgence of the colonial era tyranny. Might is right. The above mentioned constitutional prohibition can't play the due

¹⁴*Asahi Metal Indus. Co., Ltd. v. Superior Court of Cal.*, 480 US 102, 107 S.Ct. 1026 (1987).

role. Absolute Power corrupts absolutely. Thus Independence War and Const. were of no value in Cincinnati city. The minority civil servants autocracy despotism is the historic development inevitable and irresistible to their constitutional master. The judge turned his office oath into a farce without judicial independence. Experienced a bitter civil war expense, we must cherish and protect valuableness of the country unity and the constitutional order in from of the nations.

PRAYER FOR RELIEF We, US patriots, in order to protect the unitive law and federalism, establish protection of the judicial integrity and justice mechanism in the true administration justice, provide the private ownership regime security, insure the Const. guaranteed property and liberty, restore Property Law economic role, do hereby respectfully requests the following relief. Since the history prove that no way to prohibit the city outstanding incorrigible rebellion excepted the below constitutional tort. The relief can encourage the more constitutional challenge to prevent the unconstitutional ordinance. A leopard cannot change its spots. A stitch in time saves nine. An ounce of prevention is worth a pound of cure.

1. A declaratory judgment stating the above CBC are invalid(excepted No.1 CBC) null, and void;
2. A preliminary and a permanent injunction against Cincinnati city, and its officers, agents, and employees, prohibiting the enforcement of the CBC.
3. The applicants apply to reverse the all double convictions to Chong Hao Su and the concerned CBC violation convictions to wife Martha W. Lee. That this Court awards the other relief that this court deems just and proper under the circumstances.
4. That this Court awards the injunctive economic relief for the restitutionary remedy and the unconstitutional CBC' damage to us and for the applicants survival and medical fee. We lost the buildings and all investments and get the about the much doubt. **The claim detail is omitted and will be submitted later.**
5. That this Court awards the all costs in this action.
6. That this Court awards the applicants seek the other concerned relief that caused from the CBC. The applicants will submit the detail in the normal application.

Applicants: Chong Hao Su (writer) Martha W Lee

Applicants: Signature: 苏崇豪 李慧娟 suchong5@gmail.com

THE CERTIFICATE OF THE SERVICE

I, Martha Lee serviced the "Memorandum -Brief of the constitutional challenge" document to the prosecutor office in the Cincinnati city hall in 801 Plum street Cincinnati Ohio 45202. On Dec. 21, 2010 and Jan 15, 2011

Martha Lee



APPLICANT: Chong Hao Su



Applicants: Signature: 苏崇豪