

JUL 18 2018

OFFICE OF THE CLERK

CASE NO. _____

IN THE SUPREME COURT OF THE UNITED STATES

LENA HARDAWAY — PETITIONER

vs.

SHLOMO DOSTEKAM et al— RESPONDENT

**Application to: the Honorable Sonia Sotomayor
Supreme Court of the United States**

**ON PETITION FOR A WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS FOR THE
DISTRICT OF COLUMBIA CIRCUIT**

NO. 17-7108

**PETITIONER'S OPENING BRIEF
Rule 17. Procedure in an Original Action**

Lena Hardaway
3232 Georgia Ave NW Suite 605
Washington DC, 20010
lena@ColorLawCenter.org
(202) 900-8855
July 18, 2018

GLOSSARY OF ABBREVIATIONS

ADA	Americans with Disabilities Act
SRL	Self Represented Litigant
DSRL	Disabled Self Represented Litigant
DCHA.....	District of Columbia Housing Authority
DDD	Delay and Dismiss and Deteriorated
FOIA	Freedom of Information Act
AAD.....	Amend Amend Dismiss
FP.....	Formidable Barriers
IA.....	Interlocutory Appeal

TABLE OF AUTHORITIES

Cases:

Hardaway vs. District of Columbia Housing Authority, - (Legally Related Case).....	3
Hardaway vs. District of Columbia - (Legally Related Case).....	3
Smith vs. District of Columbia	3
Young vs District of Columbia Housing Authority	20
Hardaway vs. the City of Hartford	31
Jane Doe vs. Law School Admission Council	3

Appendix

Hardaway vs. Dostekam order.....	1
Judicial Misconduct Complaints by Hardaway and an unrelated African American woman	
Smith against Judge Richard J. Leon, same time, same complaint, same race, same sex,	
same dismissal	3
Chart of both complaints.....	4
Example of Judicial Abuse.....	14-27
Letters complaining of Judicial Abuse.....	14-27
The Court returning fee waivers false claiming the never received them	
Related Case: Order from DC Circuit Court related case detail Judge Richard J. Leon abuse.....	28
Email for the Clerk told me to pay \$400 filing fee if I want equal rights.....	45
Related Case: Hardaway vs DC - Order from DC Circuit Court confirming Judge Richard J. Leon	
dismissing on grounds the defendant did not argue.....	46

Constitution, statutes, regulations and rules:

Americans with Disabilities Act and Rehabilitation Act:

The Americans with Disabilities Act (“ADA”) prohibits a public entity from discriminating against a qualified individual with a disability, and prohibits excluding such an individual from participation in, or denying her the benefits of, the services, programs, or activities of a public entity. 42 U.S.C. § 12132. Section 504 of the Rehabilitation Act similarly declares that “[n]o otherwise qualified individual with a disability ... shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” 29 U.S.C. § 794(a).

Statement Of Facts And Procedural History

The procedural history of oppression from the Lower Court is drawn from various other filings, orders, and opinions in all three related complaints assigned to Judge Richard J. Leon. The Lower Court had ignored or denied all thirteen reasonable accommodations request for my severely disabled sister and me forcing me to act as a lawyer to my sister. The Lower Court refuse to following rules of regulation guiding accommodations request in violating Section 504 and ADA. Hardaway disability affects all members of her mother side of the family; therefore it was a legal error for the Lower Court to place the legal error to place the burden of legal representing my severely disabled sister when I am a person with disabilities. The fact my sister and I received accommodations all our lives until the lower Court discrimination. The Lower Court had a legal duty to comply with the ADA when they there is no one to enforce the rules and procedural facilitate reasonable accommodations under ADA.

A. Parties

The parties to this appeal and in the proceedings before the district court are Plaintiff-Appellant Lena Hardaway (“Hardaway”) and Defendant-Appellee Shlomo Dostekam.

B. Rulings Under Review

Hardaway appeal a May 23, 2018 order, entered by the DC Circuit Court of Appeals . United States District Court for the District of Columbia, abuse his authority by violating the constitution, violating the 14 Amendment and violating color of law and his fiduciary duty as a Federal Judge in this case in the two legally related cases. The pattern of gross discretion rise to the legal of conspiracy to deny Justice when it clearly evident in all three related cases. Judges, Staff Attorneys, Clerks, who collude to deprive disabled self-represented litigants Basic Access to the Court. The Court declared Hardaway a Second-Class Citizens as a vulnerable American and places Formidable Barriers to block basic access to the court let alone meaningful access to the court; therefore denied due process. The Bill of Rights guarantees that the government can never deprive Americans of certain fundamental rights including the right to due process of law, the purse of happiness, These fundamental rights were not afford to Hardaway due to Race in violations of the Civil Rights Act 1964, Are these Fundamental Rights not afford to her despite the ADA 1990, 2010 and revised in 2016.

C. Related Cases

1.Hardaway vs DCHA The DC Circuit said, “The district court dismissed the case on standing and mootness grounds and, in the alternative, granted summary

judgment. Because these rulings were erroneous, we reverse. And because the

district court abused its discretion in summarily denying our motion to seal certain medical records, we reverse that decision as well.” Judge Richard J. Leon violated privacy, and filed medical records and summary disses complaint with prejudice and tried to say we did not file the appeal within 30 days

despite certified mail proof. Delaying my appeal for another year. Due to the Lower Court abuse in all three related cases, Hardaway filed a Motion to replace Judge Richard J. Leon and filed timely Judicial Misconduct Complaints

against Judge Richard J. Leon. We filed a Notice of Interlocutory Appeal on 19th day of April 2016 (No. 13-7138). This Court dismissed that interlocutory appeal for lack of appellate jurisdiction. D.C. Cir. Case. The district court's denial of the Motion for replacing Judge Richard J. Leon despite showing a clear pattern of abuse in this case in the two other related cases; therefore this issue is one of the issues raised on this appeal.

2. The U.S. District Court for the District of Columbia received on July 18, 2014, and docketed on July 24, 2014, a complaint filed by Hardaway against the District of Columbia and its Chief of Police and Mayor (No. 1:14-cv-01273). Case

No. 1:14 - cv -01273 Docket Entry #1: The complaint alleged a D.C. police officer's failure to enforce Hardaway's rights as tenants against a July 18, 2013, attempted eviction by Angelene's leasing agent. Id. On August 31, 2015, an order and an opinion by Judge Leon were docketed that dismissed the case; the **opinion denied defendants' motion to dismiss for lack of standing but granted their motion to dismiss for failure to state a claim under Federal Rule of Civil**

Procedure 12(b)(6). Hardaway v. District of Columbia, No. 1:14-cv-01273, 2015 WL 5138711 (D.D.C. Aug. 31, 2015). Hardaway appealed (No. 15-7095). On January 4, 2016, this Court granted the defendants' motion for summary affirmance. Hardaway v. District of Columbia, No. 15-7095, 2016 WL 232009 (D.C. Cir. Jan. 4, 2016).

Reasonable Accommodation under Americans with Disabilities Act and Rehabilitation Act:

1. To be allowed access to the Court despite my disability preventing me from communication effectively with the court. Details will be provided to the court by request.

QUESTION PRESENTED

ISSUE 1

The Lower Court showed a pattern of abuse by placing FORMIDABLE BARRIER to prevent me access due to her DSRL status from July 11, 2013, until May 2018 when this Complaint was dismissed. The Lower Court, Conspired to deny my Constitutional Rights in this case and the two related causes due to my status as person with disabilities, as an African American female, as a poor person and as a Self Represented Status. And whether the e Lower Court willfully violating my constitutional and civil rights pursuant to 42 U.S.C. §§ 1983, and other civil rights laws including Equal Protection Clause.

ISSUE 2

The Lower Court Obstruct Justice by refusing to read the complaint with "liberal construct" as required as a rule in handling SRL complaints. Did the Lower Court Obstruct Justice by not informing the DSRL what missing from her complaint with the opportunity to Amended as required by the Supreme Court.

ISSUE 3

Did the Lower Court overstep their authority by allowing Richard J. Leon to make up "alternative facts" then rule on these facts as real despite the facts defendant's lawyer never argued any of those facts. Therefore ruling to deteriorate dismiss on lies Judge Richard J. Leon made up. He made up these alternative Facts in all three motion to dismiss. In this case the Lower Court legal advice to the defendant's lawyer.

ISSUE 4

Did the Lower Court obstruct justice by not liberal construct my Pro Se complaint as required by law; and hold Hardaway to a Lawyer Standard, and at times hold Hardaway to an evidently standard; therefore denying DUE PROCESS?

ISSUE 5

Did the Lower Court Obstruct Justice by blocking access Discovery, thereby having her evidence deteriorate due to time, for example, "livingsocial.com" is out of business along with her evidence due to the Court conspiracy to deny DSRL access to the Court? DCHA were allowed to make up a fake medical record 4 years later to force the Hardaways to settle their lawsuit or the fact, I filed Freedom of Information Act request with the DC Police department, and they said July 18, 2013, never happen despite Hardaway filing Internal Affairs Complaint and Police Miscount Complaint with the CC office.

ISSUE 6

Did the Lower Court violate ADA and Sec 504 ACT by not allowing reasonable accommodation request, denying service, and discriminating against Hardaway due to her person with disability status?

ISSUE 7

When does a pattern of discrimination in ALL THREE RELATED CASES rise to of legal of OBSTRUCT OF JUSTICE? Would the Lower Court, Judges, Staff Attorneys and Clerks deny Hardaway access if she was represented by a Lawyer.

*"The way to right wrongs is to
shine the light of truth on them"*
~Ida B. Wells

OPINIONS BELOW

The opinion of the United States Court of appeals appears at Appendix (Pet. App. 1a) and is unpublished.

JURISDICTION

This is a final judgment of the court of appeals was entered on May 23, 2018 under rule 17. No petition for rehearing was timely filed in my case. The jurisdiction of this Court is invoked under 28 U.S.C 1254(1)

BACKGROUND

I have argued and won appeals in the 2nd Circuit, in the 4th, Circuit, and in the DC Circuit Courts. I am not winning appeals because I am a legal genius. I am a person with an intellectual disability. I am winning appeals because the federal courts across the United States are brazenly denying basic due process with no fear of accountability or repercussions. This deprivation of rights has caused me great pain. I am suffering from posttraumatic judicial stress: 1) Every pleading is retraumatizing me, I hurt myself to divert pain away from remembering the judicial abuse. Remembering the pain of being denied rightfully entitled rights. 2) I collapse in the street due to the stress of judicial abuse. 3) I have night terrors of Judge Richard J. Leon. 4) I develop agoraphobia if the courts are not going to enforce my right, and the cops are not going to enforce my rights. I am safer at home. With all this suffering, I will not forfeit my rights. I wrote a book about the five years of judicial abuse I have suffered at the hands of Judge Richard J. Leon and all the complicity judges who turn a blind eye to this abuse. I had my pre-launch party on July 11 steps away from the Supreme Court at Busboys and Poets. July 11 is the five-year anniversary of date the lower court judicial abuse caused this case and the two related cases. If only the Court did their job and ruled on my Emergency Protective order/Temporary Injunction; I filed on July 11, 2013. This abuse would have never occurred. SHLOMO DOSTEKAM's lawyer admitted that SHLOMO DOSTEKAM made a "simple mistake" in his joint statement but to this day. SHLOMO DOSTEKAM returned the defrauded money. I do not understand how it could be a simple mistake" when I warn SHLOMO DOSTEKAM not to use the fraudulent contract to win the credit card dispute. But he did. Because he knows something, I did not know. He knows I am a voiceless American and my rights do not matter. The courts will not enforce my rights. Not only was the lower court complicity in his abuse. The lower court empowers SHLOMO DOSTEKAM and other abusers to take advantage of people with disabilities. Nobody in their right

mind can look at this case and say I had meaningful access to the court. Nobody can look at the related case and see a clear pattern of abuse that already been confirmed by the DC circuit court in related case Hardaway vs. DCHA. But being allowed access to the court should not be a crap shoot or rolling the dice. The case Hardaway vs. Cross State Moving and Hardaway vs. DC the dice rolled the other way. Not because of any legal reason but because of my status and pure discrimination. I am on my book & art tour right now. Tomorrow I will be on an airplane headed to Tampa to speak about this case. So far the auditions is awesome. "You have a national story," "you have so much proof" "your story must be told," your story is not uncommon this happens every day." I know it is almost impossible to get your case heard by the Supreme Court. But I did not have my case heard by the lower court or the circuit court, and they did not even try to hide their bias against people with disabilities or poor people. This court has to do something. You can not keep allowing Judges like Judge Richard J. Leon to subvert our democracy and allow disadvantaged American to be denied access to justice. This is America, My people build this country for free! I am entitled to my rights. Like all Americans.

Mr. Dostekam agent's made a fraudulent contract. (1) I reported Dostekam Agent's immediately to Mr. Dostekam by email and phone call to not use the fake alter contract and to apply my "LivingSocial voucher." Mr. Dostekam according to my "credit card" company used the alter document to steal my money. Mr. Dostekam clearly committed credit card fraud. I provided the Lower Court with the original contract, the Lower Court did not care due to the fact, I am a person with disabilities. People with disabilities are the largest minority group who are repeatedly abused by people who have a duty to protect us. Ableism is more than being called the R-Word. Ableism is when Federal Judges block your access to court and force you to settle for a "water down" version of "justice" after five years of being denied access; causing, "evidence being destroyed, by the deterioration of time.

Discrimination occurs when a particular group of people are denied their rights. Yet, the media doesn't talk about the oppression of people with disabilities by the Federal Civil Court system. The only Court people with disabilities can go to enforce Civil Rights, ADA Rights, and Human Rights. The media doesn't talk about the obstruction of justice by people who have a duty to enforce your rights. Obstruction of justice is more than Russia. The systemic indignity that people with disabilities have to face every day is another form of obstruction of justice. Our rights are stolen by the very people duty is to enforce our Rights. Federal judges, police, and government entities, prey on people with disabilities.

Combining the following three groups, people with disabilities, people of color, and women with poverty creates what I call the Vulnerable Americans. We Vulnerable Americans are called troublemakers, con artists, lazy, stupid, entitled, and uppity when we try to enforce their rights. No your place! Just sit back and be prey. Allow the defendant to steal our money, allow DCHA to steal our right to access a federal program, allow the police to ignore our landlord tenant rights and human rights to not be assaulted. Because of course American was built on was built on oppression. America replaced Slavery with Jim Crow and replace Jim Crow with "The New Jim Crow." Which targets all marginalized people.

Where federal judges can willfully violate the Constitution with no fear of repercussions in a system where judges judge judges. Without oversight.

“A system that relies for investigation solely upon judges themselves risks a kind of undue 'guild favoritism' through inappropriate sympathy with the judge's point of view or de-emphasis of the misconduct problem.”

Judicial Misconduct toward a vulnerable class and Judicial Miscount towards a female clerk goes through the same secret process where Judicial complaints are non-searchable, scanned documents; thus these documents cannot be searched for names, keywords or any content; therefore, victims cannot track Judge's history of abuse; causing he said vs. she said and everyone knows the so-called Honorable Judge word count more.

This is not a judicial problem, this is a human rights problem. The United States district courts have a history of disproportionately denying the rights of people with disabilities, people of color and other Vulnerable Americans. This is not an opinion, let alone some far-out conspiracy. It's a fact. Just look at the docket or the misconduct complaints. Everyday Americans who are too poor to hire a lawyer too poor to pay the court fees are being deprived of justice. This abuse is happening every day in courts across America.

I. (Legally Related Case) Hardaway vs. District of Columbia Housing Authority, - Judge Richard J. Leon judicial misconduct caused me to developed agoraphobia because “if the police will not enforce my rights and the court will not enforce my rights, I am safer at home.” This abuse was proven and confirmed by DC Circuit on December 6, 2016.

II. (Legally Related Case) Hardaway vs. District of Columbia - Judge Richard J. Leon died access to the court due to my status.

III. Smith vs. District of Columbia - Judge Richard J. Leon judicial pattern of abuse towards African American Women pro se Ms. Smith case to be irreparable damage due to the deterioration of being denied timely access to the court. We both filed Judicial misconduct complaint at the same time argue the same abuse and was dismiss three days apart.

IV. Young vs District of Columbia Housing Authority, Word for word almost the same complaint. One filed a month apart one by a lawyer and one by a pro se. One had access to justice and one was dismiss with perjured for lack of jurisdiction.

V. The State of Connecticut, Hardaway vs. the City of Hartford - Reported hazard to OSHA got fired. Chief Judge Janet C. Hall indifference caused the death of Tatiana Vendentsova

I. The State of Pennsylvania, Jane Doe vs. Law School Admission Council - judicial abuse cause Jane Doe access to the court; thereby denying her another lost school year due to bias in her ten-year battle to take the LSAT with accommodations.

July 9, was the being of the end. I received a letter from the District of Columbia Housing Authority (DCHA) that said my sister's (Angelene) reasonable accommodation for a two bedroom apartment was denied. I thought that must be a mistake. We had already been approved by the federal government on February 22, and the local housing authority in Montgomery County, Maryland. Then, we were approved again by DCHA on June 6, and we received the official two

bedroom voucher. The landlord had already processed the official two bedroom voucher. June 20, the DCHA's housing inspector inspected the apartment for the voucher. June 21, the inspector approved the apartment. How could we have been denied? We had already moved in! This must have been an error.

I immediately called the DCHA. No answer. So, I sent an email to DCHA's agents Sherry Smith, the ADA coordinator, and to Nicole Brooks, the woman who approved an issued the voucher. Ms. Smith mailed a "denial of participants request for reasonable accommodation" letter on July 9 that was misleadingly backdated to June 28. The envelope was stamped by a United States Post Office as received on July 7, 2013. I believe Ms. Smith purposely being misleading when she backdated the denial letter. Why would it take her eleven days to place the letter into an envelope and mail it to us when it was so critically important. Why didn't she simply email us the letter? Most of our communications had been by email. Why didn't she simply call us to inform us that she was taking back the two bedroom voucher? All these actions would have been quicker, but Ms. Smith knew she was breaking the law and just did not want a confrontation since she knew we had already moved into the apartment on June 26. She was the person who processed and approved the apartment on June 21. My email to both of them stated that this must have been an error. How can we be denied accommodations when we had already moved into our apartment on June 26?

1. Signed the lease.
2. Paid the deposit.
3. Paid first-month rent.
4. Turned on the cable.
5. Turned on the utilities.

Most of all, it was already approved by you! Ms. Smith never answered. Ms. Brook responded and said it wasn't a mistake. She told us we had to move out of the apartment right away. I was in complete shock! Of course, this is against the law. Of course, DCHA cannot order us to move out of our apartment. Where did she think we were going to go? On the street? I knew I had to act quickly. I knew I had to document everything and save all communication including the backdated letter and its envelope proving DCHA did not mail the letter until July 7. It shouldn't matter if she mailed the letter on June 28, like they falsely claimed, because we moved into the approved apartment on June 26. Okay, act fast. What do I do? I quickly went onto the federal district court website: (<https://dockets.justia.com/search>) to see if there were any other lawsuits filed against DCHA for violations. I did a search for violations of Fair Housing Act laws as well as violations of the ADA. There were plenty of lawsuits. DCHA has shown a pattern of abuse towards the weakest Americans. A history of abusing people with disabilities. I quickly found a lawsuit which was just like what happened to us. Young et al. vs. District of Columbia Housing Authority filed on May 7, 2013. It was for the same allegations. However, our abuse was worse! Young (and other members of the lawsuit) were denied access to reasonable accommodation; therefore, denied access to DCHA. My sister received her reasonable accommodation under the American with Disabilities Act and had it

stolen from her right after we moved into the apartment. We could have just stayed in Maryland and avoided the abuse we faced in D.C. completely if we were denied before we moved into the apartment.

I quickly contacted the lawyer who was listed on the Young vs. DCHA complaint. While waiting for the lawyer to get back to me, I used the "Young et al. vs. District of Columbia" complaint as a guide for filing my own complaint, if needed. It was simple! I had a professional lawyer's complaint that was almost identical to our situation. Now, I had to write an emergency protective order to stop them from forcibly removing us from the apartment and the threat of being homeless due to DHCA's willful violations of the law and common sense. I went back to the (<https://dockets.justia.com/search>) and found a similar emergency protective order and a motion to seal. I wrote a reasonable accommodation request for the court to appoint my sister a lawyer because she can't read or write due to her disability. Then, I wrote a reasonable accommodation request and motion to seal her medical records. I was worried I added too much personal information about my sister's disability that would embarrass or harm her. I worked on the three pleadings for two days using other lawyer's pleadings as a guide.

July 13, Young's lawyer got back in touch with me. Due to the threat of harm, she swiftly processed my request for help and asked for a meeting on July 14. I was so thankful the lawyer got back to me so quickly, but nothing was official yet; therefore, I still had the burden of acting as my sister's lawyer. First, I wanted to send DCHA a message that I knew they were violating the law and I knew that they had a history of doing this. I let them know, that I was serious about filing a lawsuit. I wanted them to end this abuse before they cause irreparable harm. The ADA/504 Coordinator, who was responsible for making sure the DCHA complied with the American with Disabilities Act, refused to meet with us. So, on July 11, we ambushed her office giving her one last chance to stop the madness. One last chance to stop breaking the law. I had the lawsuit in hand to file if necessary.

July 11: At 2:14 pm, my mother and my sister, and I went to the DCHA office to speak to the disabilities ADA/504 Coordinator. I wanted to tell them that I was getting a lawyer and I didn't want any more threats of forcible eviction without a court order. Ms. Smith refused to see us, so, I waited and waited. Finally, she came out of her office and said we must move out of their apartment immediately. She wouldn't listen to us. Her secretary told us that I could file an administrative hearing on the fifth floor. At 3:05 pm, we went to another office in the DCHA building to request a hearing. The hearing officer said there weren't any openings for hearings until next year. The hearing date was scheduled for January 15, 2014, at 1 pm. Six months later?! Under the housing voucher regulations, my sister must be provided a hearing within 30 days of the termination of the Voucher. DCHA basically denied the hearing request. After dealing with a high level of incompetence and willful disregard for the ADA, Fair Housing Act, and Section 504 of the Rehabilitation Act of 1973- which prohibits discrimination towards people with disabilities, it was clear that the DCHA simply did not care about the laws. It is clear that the only reason anyone would need housing assistance from the government is because you

are poor. It was like they dared me to hire a lawyer. I was outraged! What world was I living in? All that made sense no longer held its place. How could this be our nation's capital were federal government workers don't care they are breaking the law.

I showed the intake officer the lawsuit I wrote and said: "I filing this TODAY with the United States District Court of Columbia." "I know my rights!" - I felt like she was thinking, "Sure poor girl. No one cares about your rights." The DCHA's office was about one mile away from the federal courthouse. So, I ran to the courthouse like a child running to their father for help. My mother and sister went to get lunch. My sister had already signed the complaint, the protective order, the ADA request with the motion to seal, and the fee waiver. Therefore, I didn't need her with me to file the complaint. I was running desperately to make it to the courthouse before the clerk office closed at 4:00 pm. It was 3:54 pm by the time I got there. Now, I just had to get through security. I was too late. It was 3:59pm. The door was closed in my face, so, I was forced to file the papers in the drop off box. I put everything in a large envelope(the Complaint, the ADA request with the motion to seal, the protector and the two fee waivers)* marked "SEALED" just like the district court website said to do when filing a complaint "under seal." I stamped each pleading and stamped my own copy of the pleadings for my records. I felt safe. Surely, the court will see the foreseeable danger that would unfold if we were forced to move out and stop DCHA's and the landlord's threats of eviction without a court order. Of course, the court will see Angelene's doctor's report that said her life would be in danger if she didn't receive this accommodation.- (as her doctor explain in the medical report) Of course, the other details in the medical report explaining her disability and how she needs reasonable accommodations to live would make the court decide in my favor and would also appoint a lawyer to her case since she is severely disabled. I am not a lawyer, I cannot be expected to act as her lawyer.

After filing the complaint, I meet up with my sister and my mother got something to eat. I was running on fumes. But I was starting to feel happy! I didn't feel in danger anymore. I felt the court would protect us. I should have known that I would not have access to justice. I was eating my sandwich under a statue of Confederate general Albert Pike in Judiciary Square. At that time, I didn't know the statue was a confederate trader. Why would D.C. have a statue of a terrorist around the Justice Department, the FBI, and courthouses,? - but I regress.

July 13: The landlord's leasing manager said, Benita Bobo, contacted me by email. She stated that she had spoken to Nicole Brook of DCHA and had been informed by her that Angelene was not approved for a two-bedroom apartment and that she was only approved for a one-bedroom apartment." Bobo further explained that the leasing office needed to start the process of moving us into a one-bedroom apartment by July 26th. I wrote back and told her that I had contacted a lawyer and that it was the same lawyer that was suing DCHA for violations of ADA for the Young et al. vs. District of Columbia Housing Authority case. None of her options were going to work for us.

July 14, 10 am: My mother was still in town helping us decorate our new apartment, and she went with us to meet the lawyer. Angelene signed a limited contract to advise us until the lawyer was able to get approval from her boss to be Angelene's lawyer. I told the lawyer DCHA told the landlord that we were not approved for the apartment and now the landlord told us to move out. I showed her the emails from DCHA and how the landlord treated us. She advised us not to move out of the apartment. DCHA or the landlord couldn't force us to move without a court order. So, we had time. Yet, I didn't leave her office feeling at ease. I knew that the judicial abuse I had personally experienced over the last two years was legal compared to what is given to the poor as legal. They are two entirely different justice systems. I knew we were still in danger. I had been trying to schedule a meeting with the ADA/504 Coordinator since I received the letter two days prior, but she kept refusing to return my calls or emails.

July 15: Angelene's lawyer had good news. She was approved to become her lawyer officially. "Getting a free lawyer in four days is unheard off, but the abuse was such an imminent situation of life or death. They knew they had to help. He had contacted DCHA and the landlord advising them her was Angelene's lawyer and that all contact must come to him. The burden of being my sister's lawyer was over, or so I thought. Both the DCHA and landlord kept calling and sending me email threats to move out of the apartment now despite Angelene's lawyer contacting DCHA and the landlord.

July 15: DCHA employee, Nicole Brook, sent an email that said we weren't allowed to access the apartment. I contacted Angelene's lawyer and told her that both the landlord and DCHA continued to contact us even though they knew she was representing Angelene.

July 15, 2:35 pm I went back to the United States District Court clerk office to make sure they received our complaint. Two different people one male and one female, both African American, confirmed that the clerk's office had received our ADA request with the motion to file under seal, complaint, and emergency protective order/ temporary injunction. The Clerk and Head Clerk both confirmed they received the pleadings and my case was on the chief judge's Desk. Nonetheless, I was worried because I did not see it on the public docket. I was concerned. My gut was telling me misery was near.

July 17: The landlord manager, Bobo, continued to ignore our request to only talk to Angelene's lawyer. The leasing manager wrote to me again stating, "DCHA's Ms. Brooks confirmed that you are not approved for a 2-bedroom voucher." Bobo set out three options for me. We could transfer into a one-bedroom unit, pay full rent on the unit we had already leased presumably without DCHA assistance or cancel the rental application and turn in the keys. I told her by email that none of those options will work and to contact Angelene's lawyer or we will sue the landlord for Fair Housing violations. She had to obey the law. She couldn't contact me on behalf of Angelene when my sister was represented by a lawyer. I was just Angelene's living in aid, not a lawyer. Since Angelene is disabled, she couldn't legally make these decisions. I warned her that I expected to use the loading dock and the elevator the next day without any difficulty.

uly 18, 2013, was not the worse day of my life but it was the day that changed the trajectory of my life. My sister's lawyer had already contacted DCHA and the landlord, but I always braced myself for the worse. I had my sister's lawyer on speed dial, but I never actually thought that law enforcement would turn their back on me again. The abuse I faced from the Atlantic City police must have been a fluke, one-time, isolated incident. It couldn't have been the start of a pattern of misconduct towards African American women or other marginalized Americans, could it?

July 18, 2013, The day Mr SHLOMO DOSTEKAM stole my money and committed credit card fraud was the worse day of my life. I attempted to move the rest of our belongings into the apartment. We were stopped by a building employee. The employee explained that, since DCHA had rescinded our two-bedroom voucher, we would not be allowed to continue moving in. The employee physically blocked our truck from parking at the loading dock and attempted to coerce my sister to into signing a new lease for a one-bedroom unit down the hall while my mother and I were away from her. My sister was watching the stuff being removed from the truck. I heard my sister scream "stop pushing me." Then, I ran down the hall and saw the employee attacking my sister trying to force her to sign a contract that knew she couldn't read and knowing that she had legal representation. I quickly called the police for assistance. I called them to 1) report an assault, 2) to stop an illegal eviction attempt and 3) to stop the abuse of a person with disabilities. That was the worse mistake of my life. Which lead to lawsuit number two Hardaway vs. District of Columbia.

I was raised to believe that the police are our friends. I was raised to believe, that if you are in danger, law enforcement will be there to help you. I was never unnerved by the police. I have been pulled over many times for driving too fast, running stop signs, and running lights but I never once got a ticket. White police officers or Black police officers looked at my car and looked at the address on my driver's license and knew I was privileged. Police officers never gave me a ticket even when I deserved it. I never realized at the time that it was my privilege that protected me. When you have money, you don't care about getting tickets and cops don't care about giving them to the people who can pay the tickets. That is something only reserved for the poor.

When I called 911 on July 18, at 2:51 pm, I explained that the leasing agent was physically attacking my disabled sister and forcibly trying to evict her without a court order. One would think the cops would enforce my rights? I was doing the correct thing. I did not physically attack the leasing agent. I did not engage in any act of violence in the name of self-defense. I did what I was trained to do- rely on law enforcement. It took 20-30 minutes for the police to arrive. When the White male police officer finally came, he decided to discriminate against us because of our black skin, sex, and our disability. He decided he did not care about enforcing the law. Our rights were optional.

I explained to the police officer that my sister is a person with disabilities who took possession of the apartment on June 25, 2013. Angelene had paid the utilities, the rent, & deposit, and had signed the lease. The leasing agent forcibly attacked my sister and tried to make her sign a new lease knowing she cannot read, knowing she has a lawyer and knowing

the leasing agent had no right to illegally deprive her access to her apartment without a court order. Despite us having the law on our side;

The officer said, "This is a landlord-tenant matter, go to landlord-tenant court and get a lawyer."

Lena to the officer, "I have a lawyer, who is actively trying to contact the leasing office, but they are not answering the phone." "My lawyer has been calling all day."

Lena to the officer, "Please, talk to the leasing agent, and tell her to stop touching my sister and trying to force us to sign a contract" {without her lawyer permission.}

Lena, "Can you please just talk to her,"

White Male Officer, "No!"

Lena, "She is taking advantage of my disabled sister and refusing her access to the apartment."

White Male Officer, "I cannot talk to her. You have to go to court."

Lena, "My things are in the apartment, where are we going to live. I need your name and badge number."

The Officer, "NO!"

Lena, "She is taking advantage of my disabled sister and refusing her access to the apartment."

White Male Officer, "I cannot talk to her. You have to go to court."

Lena, "My things are in the apartment, where are we going to live. I need your name and badge number."

Lena, "She is taking advantage of my disabled sister and refusing her access to the apartment."

White Male Officer, "I cannot talk to her. You have to go to court."

Lena, "My things are in the apartment, where are we going to live..."

While the officer walked away

"I need your name and badge number."

The White officer walked away and refused to give me his card or file a report. I stood there exhausted I could not stop crying. The officer did not even tell me his name. I was in shock. How can this be happening again? Is it Atlantic City all over? Finally, the leasing agent answered the phone and started talking to my sister's lawyer. The leasing agent allowed us access to the apartment. Exhausted, crying and overwhelmed by the day.

Cross State Moving felt like this was the perfect time to defraud me out of money. The moving company altered the contract after I signed it and placed the contract face down the counter. Lucky for me, from years of owning my own business, I had seen this trick many times. My brain is trained to scan or take pictures of contracts after I sign them to have proof of what I signed. When I signed the contract at the beginning of the move, I scanned it into my computer. I do this as second nature. My scanner was the last thing the movers moved. When the movers left, I immediately called Sam

the owner of Cross State Moving and left a message. I followed up with an email at 5:12pm stating "Your employees tried to defraud me with all these distractions of the day" "You better not try to use the fraudulent contract." I made a copy of the original contract." Do not play with me, Sam. I do not need another lawsuit." (i.e., the third lawsuit, Hardaway vs. Cross State Moving, et al.) Of course, SHLOMO DOSTEKAM aka Sam used the fraudulent contract.

What else could go wrong?

Why did this foreseeable tragedy even happen?

I filed an emergency protective order to prevent this day from occurring. I went to the courthouse on July 15 to make sure they had the emergency protective order. I followed up with a certified letter to the chief judge on July 16 to make sure he understood the imminent danger and that he knew my sister was a legally "protected-class person." Deliberate judicial indifference caused these tragic events of the day; therefore caused the following two lawsuits against the police and Cross State Moving. The United States District Court Chief Judge Richard W. Roberts had a legal duty to provide the same justice as if a lawyer filed the emergency protective order/ injunction and the complaint.

Why did the ACLU of Virginia filed an emergency protective order on August 9, 2017, and have a hearing the next day? The state of Virginia told the Judge they were not staffed with enough people to control a KKK riot. Why does the KKK's freedom of speech receive more protection than a disabled person's imminent threat of life and safety? A standard emergency protective order was processed within one day when it was concerning someone's safety. However, my emergency protective order was not processed, according to the district court, until August 9, 2013. This was after I had sent three certified letters to Chief Judge Roberts asking, "why I was being denied access to the court." I asked why was "not receiving due process." Basically, I was asking Chief Judge Roberts, "why my rights are ignored"?

The first certified letter was sent on July 16 and warned the court that "my sister was in imminent harm." July 29, I sent a second certified letter detail the abuse we suffered from the court's refusal to process the emergency protective order. The third certified letter was sent on August 13 and declared my utter disappointment in our justice system and compared it to Jim Crow justice system. The first unconstitutional action by the court was when they didn't process the emergency protective order as required by law. The second unconstitutional action by the court was when the court crossed out the received date as July 11 at 4:05 pm and altering the received date to July 21. The third unconstitutional action was the court claiming they had processed the emergency protective order on August 9, 2013, but didn't update the court filing system until August 28. These are all procedural violations due to class discrimination. However, these procedural violations were nothing compared to the outright obstruction of justice that occurred when all three of my federal complaints were assigned to the same judge. Judge Richard J. Leon. I thought my life was in despair on July 18, but I didn't know what misery was until Judge Richard J. Leon destroyed my belief in humanity.

I have grappled with my sadness, my despair, and even my hopelessness, trying to make sense of it all. How did I get here? What did we do to deserve this? The abuse we suffered from DCHA, the court, and the police was a perfect storm of incompetence meets indifference meets bias. We were denied access to DCHA resources when we tried to enforce our rights. We were further denied access to the DCHA program when our federal lawsuit asserted violations of the Fair Housing, Sec 504 of the Rehabilitation, and ADA rights were ignored. It was a great injustice that we were denied access to the rights we are legally entitled to from the DCHA, the police, and the Court.

The district court refused to treat us as Americans and hear our case because someone who wasn't a lawyer filed the emergency protective order. It didn't matter that it was almost identical to protective orders filed by a lawyer. We were invisible to these government entities when we tried to enforce our legally entitled rights to have access the police, to have law enforcement stop the leasing agent for physical attacking a person with disabilities, and to prevent an illegal eviction without a court order. What kind of nation of people who claim to love America, love our Constitution, and love humanity would allow the most vulnerable Americans to be abused by the judges, police, and government officials?

After weeks of persistence writing letters to Chief Judge Richard W. Roberts - complaining I was being denied access to the court because of my disabilities and pro se litigant, legal self-representation, status - Chief Judge Richard W. Roberts processed my complaint. The district court denied my emergency injunction/ protective order motion in an order dated July 20, 2013, but not docketed until August 9, 2013. The denial order stated "the court concluded that the Hardaways had neither shown that they would suffer an immediate injury before DCHA could be heard in opposition" - Oh was the court wrong! I guess written threats that the DCHA's agents were going to illegally evict us without a court order does not prove "immediate injury" when it applies to a person with disabilities. Let's be honest, a lot of judges and police officers do not care about us. In fact, the actions of these judges and police officers seem to show that they hate us, or at the very, they just do not see us. We are invisible. The court did not take my pleas for help serious due to my race, disability, and socioeconomic status. Whatever the case, emergency injunction/ protective orders are normally heard within 24 hours. Just look at the Charlottesville.

The ACLU sued the city of Charlottesville, Virginia to allow a Klu Klux Klan, KKK, rally to happen downtown. Yet, they denied our pleas for help. I guess I need to be a member of the KKK to get assistance from ACLU. Chief Judge Roberts routinely assigns most pro se cases to Judge Richard J. Leon. Knowing Judge Leon will intentional makeup laws to deprive pro se access to the court without any fear of repression. Spoiler Alert- To all the Americans who cannot believe this absurdity, this clear obstruction of justice, this clear violation of his sworn oath of office to be true-it has already been proven and confirmed by the D.C. Circuit Court as fact on December 6, 2016. The DC Circuit court has repeatedly declared Judge Richard J. Leon "gross abuse of discretion" - in other words; you are not following the Constitution - you are making up laws.

Judge Richard J. Leon's second willful act of obstruction of justice was when he denied our request to seal motion in an order docketed on September 5, 2013. Notwithstanding my sister's. Medical report and other medical information in the Hardaway's case-opening filings, the court declared that none of the documents filed to date was a medical record. The court stated that my sister's having a "disability is a critical fact" for our allegations and prove to prevail; that "it alone is not information so sensitive" as to justify sealing the case documents; and that the parties could seek to redact or seek a protective order as to any medical records or sensitive documents that might be introduced later.

We filed a notice of interlocutory appeal when we should have filed a petition of writ mandamus. This decision applied the wrong legal standard, from that order, which this court dismissed. (because of appellate jurisdiction due to lack of a final order.) The D.C. Circuit Court should have accommodated our pro se status and known we meant a petition of writ, not interlocutory appeal, but our request to seal medical records were denied over a technicality. Despite the fact, the court filed the medical records which were against the court's own local rules and against President Obama's executive order that dictated how the federal government must handle medical records.

The DCHA filed a motion to dismiss or, the alternative, motion for summary judgment on October 21, 2013. DCHA recklessly lied to the court and said, we did not submit any documentation to support Angelene's need for accommodation. They said this despite email proof- we emailed Ms. Brooks and Ms. Smith- proof that we faxed the medical records to Ms. Brooks and Ms. Smith, and proof we also sent these documents by certified mail. We tried to give the DCHA the medical proof personally, but they refused to accept it stating that it had Montgomery Country letterhead over D.C. letterhead.

Judge Richard J. Leon's third willful act of obstruction of justice: Judge Leon allowed the DCHA to file additional medical information, given to the DCHA when we requested a reasonable accommodation, without Angelene's permission and without sealing the information.

We immediately opposed the dismissal motion, arguing the DCHA was lying and that, according to rule 12b, the court must believe us at the complaint stage of the case. We also argued that the DCHA caused us "financial and emotional harm" and that the case was not moot even if "DCHA finally applied a temporary bandage to the problem" because DCHA had not "solved the problem it created." Judge Richard J. Leon's fourth willful act of obstruction of justice: Judged Richard J. Leon allowed the district court to issue an order and opinion on July 30, 2014, that dismissed the case with prejudice.

Judge Richard J. Leon's fifth willful act of obstruction of justice: I filed a notice to appeal and sent it certified mail. Guess what? The court never filed the notice to appeal, despite the fact, I sent the notice by certified mail. It took Judge Leon another year to grant my "notice to appeal" once I submitted proof the court received the notice.

Remember the case I modeled our complaint after, Young et al. vs. District of Columbia Housing Authority?. In this case, the DCHA admitted that they were wrong. They guaranteed that they would change their illegal policy and would train their employees better. They settled the lawsuit for \$350,000. You would think that, once they admitted they had a culture of ADA abuse in one case, the DCHA would allow my sister her accommodations? You are wrong. Why should DCHA give in to a pro se complaint? When judges hate them. Judge Richard J. Leon dismissed the case for lack of standing even though the DCHA did not even argue lack of standing. The DCHA had not argued lack of Article III standing.

That was Judge Leon acting as defense attorney and judge, not as a neutral arbitrator. You don't believe a judge would blatantly violate the rule of law and dismiss a complaint on grounds the defendant did not argue, on the grounds that were made up by the judge with prejudice for lack of jurisdiction when you only can dismiss without prejudice for lack of jurisdiction. You don't believe this could happen? Go to 14-7144 on the docket. All these abuses are confirmed as true by the D.C. Circuit Court. Judge Leon's bias grew more shameless, more cruel, and more uncaring by the day during this case. The lack of oversight caused the judge to believe he can openly obstruct justice without fear of repercussions.

For months, we tried other avenues to settle the injustice of the Cross State Moving incident by trying to talk to the owner, Shlomo Dostekam (aka Sam), and filing an Attorney General Complaint. However, I was forced to file a lawsuit against Cross State Moving because the Attorney General of Maryland did nothing despite there being numerous complaints of fraud against the company. I was also forced to file a lawsuit against the D.C. police after I filed an internal affairs complaint because the Office of Police Complaint (OPC) and the Attorney General complaints all went on deaf ears. Again, if nobody cares about my rights, I must do it myself.

Being declared voiceless by law enforcement caused me to internalize my rage. When I am afraid, those tears start flowing down to the point which it seems never to end. On June 9, 2018, at the Hilton Hotel on 16th street, steps away from the White House, - I was attending an American Constitution Society Convention seminar on - "judicial bias." I told my story of judicial abuse and - how the same complaint, when filed by a lawyer compared to one filed by a self-represented litigant, produces entirely different results in the D.C. District Court.

After I spoke, a lawyer from California spoke,- she said, I had a client who tried to explain her case to the court. The judge ignored the complaint. When I said the "same words, my client told the judge" the judge allowed her client access to the court. Those tears started flowing down my eyes. I explained to the group, "the abuse you are describing is the abuse I been complaining about for years." When I talk about judicial abuse, it falls on deaf ears. Finally, a lawyer is confirming this abuse.

The lawyer tried to confront me, "I sorry I made you cry." I told her "it a good cry" "I am finally being seen." "These judges do not understand their indifference is hurting real people every day and it seems like nobody cares," She

told me that, she cares, - and gave me her business card. She told me to call her if I ever needed anything. This one lawyer saw me; I was no longer invisible that day.

However, my insides are damage due to post-traumatic judicial stress. Now, Every time I write a pleading now it retraumatizes me; I literally - bleed., I hurt myself to divert pain away from remembering the judicial abuse, remembering the pain of being denied my rightfully entitled rights. I have night terrors of Judge Richard J. Leon's abuse, and I collapse when the abuse gets too much. I develop agoraphobia if the courts and the cops are not going to enforce my rights, and the cops are not going to enforce my rights. I am safer at home. Now, my doctor does house calls. Judicial abuse caused me to develop high blood pressure and, depression the same high blood pressure my grandfather developed when he was forced to flee Georgia with five kids and a pregnant wife because of the KKK. He collapsed once he made it to Connecticut. His blood pressure was near death, and he was hospitalized for two weeks.

Just like my grandfather, on November 8, 2017, at 3:48 pm I collapsed - in my doctor's office. This was not the first time I had fainted, - it wasn't even the first time I fainted in a doctor's office. But it was the first time I fainted and refused medical treatment. I told my doctor, "I can not go to the ER because I have to finish writing my brief." (I had just finished my brother's brief for the 2nd Circuit Court which I won on January 12, 2018; I was working on a brief for the DC Circuit Court.)

My doctor said, "I been warning you for a while. You are headed off the cliff." - "You are NOW off the cliff.-, You need to prioritize your health".

"I am tired of being treated like a second-class American.-, I must finish my brief. I am almost done., I am just editing down and fixing grammar mistakes. I CAN NOT GO TO THE ER."

The doctor started getting MAD, "You are not listening to me." -"You need to go to the ER." He started listing a bunch of medical problems I could have.

"The medication you are on does not make you dizzy or faint., So, you need to find out why."

I can not go to the ER every time I faint!"

He said, YOU ARE NOT LISTEN! YOU ARE GOING TO BURN BRIDGES WITH ME....DO YOU WANT TO BURN A BRIDGE?"

I started crying, "You are not listening to me., I can not go to the ER.,- The court will take away my civil rights! They are looking for any reason to throw out my case out! The federal courts make up reasons to throw out my case."

My doctor was outraged "it is my medical advice you are going to the ER. - "Do not burn a bridge!" "I will die trying to enforce my rights like my great uncle did when the KKK lynch him for trying to enforce his rights." "I am tired of being treated as a second-class American and having the court abuse me."

The doctor said, "Your health is more important!"

"You are NOT hearing me! I have to protect my rights or nobody will! Nobody cares, and you are fired!"

That is when the nurse wheeled me away. The director of the clinic started trying to convince me to go to the ER. After an hour, the staff finally gave up and had me sign a release.

What happened to me on November 8, 2017, at 3:48 pm was indisputable proof my disability has taken over my mind, and I am not making good decisions. I should have gone to the ER; I should have put my health first; I should NOT have fired my doctor who was just trying to help. My mind was not thinking straight. Of course, I should have gone to the ER. I couldn't finish my brief when I got home because I was still too sick.

I wrote to the D.C. circuit court and provided them with my doctor's information and reasonable accommodation request to be appointed a friend of the court to help me with my brief because of this medical emergency. But of course, the court ignored my reasonable accommodation request, and my case dismissed. So I did the best I could do and listed most of the due process violations. Of course the did not address not one of my due process violations just ignored it like I did not argue these due process violations. If you don't believe me just look at the docket.

Lower Court is in violation Title II of the Americans with Disabilities Act ("ADA"), 42 U.S.C. §§ 12131 et seq., and Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, Equal Protection under the 14 Amendment, and other Constitutional rights by Placing 28 Formidable Barriers to prevent me meaningful access to the court: The lower court place disproportionate Formidable Barriers to prevent me a person with disabilities meaningful access to the court and unlawful deprivation of federal rights. **Judge Richard Leon pattern of discriminate against Hardaway and other SRL in all three related cases.**

*(1) Reason for Filing Complaint
FORMIDABLE BARRIER
(1) Reason for Granting the Writ*

On June 2016, Judge Richard J. Leon violated ADA, 14 Amendment 504 Act and 28 CFR Part 35, by placing additional barriers to prevent me meaningful access to the Court by denying my legal right dismissing my case (a protected class person as a person with disabilities) and force me to Jump through additional hoops to obtain Justice. The Supreme Court, ADA, SECTION 504 ACT,, mandates the court to accommodate when a person's disability prevents them meaningful access. Despite these mandates, the Lower Court ignored or denied my request 13 times without detailing why as required by ADA. This illegal FORMIDABLE BARRIER is a normal illegal action The Lower Courts place on DSRLs who can not fight back because we are powerless.

**REQUEST FOR REASONABLE ACCOMMODATION UNDER THE AMERICAN WITH DISABILITIES ACT -
(lower court denied 12 times)**

1. Request the Court to Appoint Counsel.
2. Request access to the CM/ECF system.The Lower Court denied BOTH

Request. The 13 request was 1/2 denied- Judge Leon allowed me the use of the CM/EFC when I filed a Writ with the DC Cricit putting the DC Cricit on legal notice of this abuse. My Reasonable Accommodation Request to be appointed a lawyer since my severely disabled sister can not read or write due to her disability but I was force to be her Lawyer, so Judge Richard J. Leon can abuse her for over 4 years and counting. Judge Leon knew by allowing us equality by granting us our reasonable accommodation request, will prevent him from abusing us based on our disability. Judge Richard J.

Leon rather have me a Person with Disability, the same disability that runs in my family to represent my sister in court? What kind of America is this? My disability prevents me from reading the court papers but my computer could read it for me if I had access to access to the CM/ECF system was vital for me to receive meaningful access. The lower Court refuses to allow me meaningful access to the Court by ignoring and/or denying my reasonable accommodation request without a Hearing or a reason why they are denying me request as required under Sec 504 and ADA. The lower Court is placed barriers to prevent me meaningful access due to my disability. It is unreasonable for Judge Richard J. Leon not to allow a hearing for ADA accommodations, specially when my disability prevents me from writing the request in the way the Judge illegal requires. That is why ADA accommodation request is written broadly to allow people like me who can not write a request without a lawyer.

(2) Reason for Filing Complaint

JUDGE RICHARD LEON PATTERN OF DISCRIMINATE AGAINST HARDAWAY AND OTHER SRL.

FORMIDABLE BARRIER /OBSTRUCTION OF JUSTICE UNLAWFUL CONSIDERATION OF MITIGATION MEASURES (42 U.S.C. § 12102(4)E

The District Court for Columbia denied Plaintiff's "12" reasonable accommodation request to access the CM/ECF system. This denial is shocking because it's a basic ADA Right for people with disabilities to have access to technology that will help accommodate a disabled person. These Court's illegal actions can be compared to a blind person asking to use a braille and the Court refuses to allow him this simple accommodation. The ADA, 42 U.S.C. § 12102 (4)(E)(1)(i)(I), requires that "any determination of whether an impairment substantially limits a major life activity shall be made without regard to the ameliorative effects of mitigating measures such as access to the CM/ECF SYSTEM." By refusing to allow Plaintiff access to the CM/ECF system the court is depriving Plaintiff from the use of her "reader" (a reasonable accommodation device that allows Plaintiffs to understand PDF documents ..ie (text to read); therefore, denying Plaintiffs meaningful access to the court by allowing them to not understand the Court orders, defendant's motions, and other pleadings. Plaintiff reader can not read scan documents but can read PDF documents; therefore, access to the CM/ECF system is an absolute right under ADA. The Court is currently denying Plaintiffs full understanding of pleadings due to the Court refusal to allow access CM/ECF system. The only logical reasons for these courts to violate ADA..... is to make it more difficult for a SRL to access the Court. By allowing the Courts to dismiss SRL complaints due to the Court discrimination (1) by refusing to file motions in a timely manner, (2) ruling on motions before the other side attempt to mail the motions to Plaintiffs, (3) losing pleadings, (4) not mailing "minute orders," (5) changing the docket without notation.(I have the before and after screen shots)

Over time, the Federal Court became more stringent with federal rules of procedures. Making it nearly impossible for the average Joe to litigate the case without an attorney. Therefore forfeiting his right due to the fact he cannot afford to

pay an attorney. Americans with disabilities at with design to give people with disabilities a level playing field but how can we have a level playing field if the court itself refuses to the follows. The Americans with Disabilities Act of 1990 was designed to allow people with disabilities a level playing field. Despite this Act, people like the DCHA and the lower court refuse to allow meaningful access to their public accommodations and/or local government service. The Lower Court relying on the ADA to be destroyed by President Trump. If Education and Reform Act of 2017 (H.R. 620) Pass. It will be legal to discriminate against individuals with disabilities. But the law has not pass as of today, The ADA 2010 Act, with July 15, 2016, revision of Title II, and title III to help me receive meaningful access to the Court but the Lower Court denied all reasonable accommodations

(3) Reason for Filing Complaint

FORMIDABLE BARRIER /OBSTRUCTION OF JUSTICE

Judge Richard Leon September 5, 2013, deny my Motion to Seal Medical records he refuse to see me as a person, only a Second- Class American, he ruled “[i]t alone is not information so sensitive that all pleadings, discovery materials, and non-dispositive motions must be filed under seal.” The district court predicated its order on its perception that “**to date, none of the documents filed in this action is a medical record,**” without acknowledging that my health provider form was in the record as an attachment to the complaint filled out by her doctor. Judge Richard Leon, only sees and only reads parts of the complaint to fit his narrative to allow him to discriminate against plaintiffs. **The Lower Court is abusing their power by intentionally filing Plaintiff's fee waiver application** as part of the complaint to humiliate, to embarrass, and to harm Plaintiff, by showing her disability income, her bank information, and her credit card debts. The fee waiver Application information had nothing to do with the complaint and should not have been used to harm Plaintiff. September 2013, The Lower Court denied Plaintiff's motion to seal and without warning or any type of notification: **The Court published (1st) Plaintiff's medical records without blurring or sealing the medical documents for the world to see on Pacer.**.. The Court would not file medical records and/or banking information if Plaintiffs was represented by an attorney. It has been over 2 years and the Lower Court refuse to remove my sister and I Fee Waiver. Is the Court going to make me wait under three years before the court can see me? This is a clear example, of the district court reckless regards of my American Rights.

FORMIDABLE BARRIER /OBSTRUCTION OF JUSTICE

The Lower Court nonfeasance by ignoring motions for years to deteriorating my evidence. Forcing the DSRL to file ADA Enforcement Order/Protective Order due to the lower court discrimination actions of not adjudicating motions in a timely fashion causes this case not to move forward; therefore, denying me access to the Court due to Self Represented Litigant Status or Disability Status or my status socioeconomic status doesn't matter which status the Lower Court is basing their discrimination on the indisputable fact is the Lower Court at will, not violating the Constitution, Due Process, Fourteenth Amendment, Supreme Court Binding Precedent, if I, (a person with disability) was represented by a lawyer.

Judge Richard J. Leon participate in a practice called, " Double DD's - Delay and Dismiss" in which the Court would delay a motion to dismiss for a year or more then dismiss the complaint. He used the illegal tactic in ALL THREE related cases and all SRL complaints he was assigned to from 2013-2015, (there could be more but I ran out of time researching)

FORMIDABLE BARRIER /OBSTRUCTION OF JUSTICE (4)

August 13, 2015, The United States District Court of Columbia Judge Richard

Leon, abused his authority by dismissing Plaintiff's (a self-represented litigant)

Complaint for Lack of Jurisdiction with Prejudice:

Judge Richard Leon action was intentionally and outrageous. - Judge Richard Leon actions is a clear, absolute and undeniable proof the Plaintiffs rights were violated by the Court. No other person in America had their case denied with Prejudice for Lack of Jurisdiction. Judge Richard Leon actions are a violations of TITLE 18, U.S.C., SECTION In violations of color of law, Self-represented litigants must be freely afforded an opportunity to amend a complaint to add sufficient factual allegations, although, again, this is not a special accommodation for self-represented litigants but a requirement in all cases. The rule favoring liberality in amendments to pleadings is particularly important for the pro se litigant.

FORMIDABLE BARRIER /OBSTRUCTION OF JUSTICE

2013-2017 in all SRL case that was assigned to Judge Richard J. Leon, All Dismissed all SLR's Complaints without leave to Amend even when the SRL Ask for leave to Amend. Judge Richard J. Leon deny SRLs this basic right. Even in this case were I expressly asked for leave to Amend the Lower Court just ignored my request in my "Objection to the Dismiss Motion." Judge Richard J. Leon denied My Constitutional Rights to amend. *"that a self-represented litigant's meritorious complaint will not be lost because it is inartfully drafted Moore v. Ruth, to afford a self-represented litigant every reasonable opportunity to demonstrate that he or she has a valid claim, Satchell v. Dilworth, and to ensure that a self-represented litigant is not "precluded from resorting to the courts merely for want of sophistication."* - Judge Richard Leon actions is a clear and absolute and undeniable proof the Plaintiffs rights were violated by the Court. Judge Richard Leon actions is a violations of title 18, U.S.C., Section 242. In all three complaints!

FORMIDABLE BARRIER /OBSTRUCTION OF JUSTICE

September 2014- January 2017, The District Court for the District of Columbia

Refuse to Rule on Motion in timely manner - Some Motions are outstanding for over a YEAR; therefore, causing the case to stall for over a YEAR; therefore losing valuable evidence to deterioration of time. - a violations of Title 18, U.S.C., Section 242; July 11, 2013- January 8, 2017, The District Court for the District of Columbia refuse to file Motion in timely manner; July 11, 2013 - January 8, 2017, The District Court for the District of Columbia repeatedly/deliberately

“lost” certified mailed pleadings; On January 6, 2016 Plaintiff filed six motions for two separate cases. Mailed the motions in a certified envelope and wrote a letter to the clerk office with a picture of all six motions asking for him to not lose any of the motions. The picture was took for proof that Plaintiff mailed all six motions. The Clerk office only filed TWO out of the SIX motions. Plaintiff send the clerk office an email immediately complaining that he once again “LOST” four of my six motions. The Clerk office once again ignored Plaintiff complaint about being denied access to the Court.

FORMIDABLE BARRIER /OBSTRUCTION OF JUSTICE

The District Court for the District of Columbia Blindly dismissing Motions or Complaints without cause, and the blatant disregard of federal regulations. Causing the complaints to be overturned on Appeal. Concerning MINUTE ORDER - refusing to mail copies of the decisions to Hardaway; The District Court for the District of Columbia Concerning MINUTE ORDER - ruling on Motions from the Defendant before Hardaway is notified of the existence of the motion;

FORMIDABLE BARRIER /OBSTRUCTION OF JUSTICE

The District Court for the District of Columbia Refused to sanction Defendant Attorney when he willfully, and wantonly violates Civil Rules of Procedure and Attorney Code of Conduct by allowing Attorney Price to file documents significantly different from what he mailed to Plaintiff; When Plaintiff protest, The Court Refused to sanction Attorney Price. For example, *Hardaway v Cross State Moving*, Plaintiff provided The Court, The Defendant’s mailed copy of the Answer and what Defendant filed with the Court. The Court refused to address this extreme violation of law.

FORMIDABLE BARRIER /OBSTRUCTION OF JUSTICE

The District Court for the District of Columbia refused to enforce: Rule 26a, and Fed R. Civ. P. 33(b) interrogatories and document request. Therefore causing the deterioration of evidence due to time. (Because the Court refuse to adjudicate motions in a timely manner causing a year stay.)

FORMIDABLE BARRIER /OBSTRUCTION OF JUSTICE

Not only does Police have a duty to follow color of law but Judges also have this duty. The *District Court for the District of Columbia failed its duty by not applying the law equally*.

HARDAWAY et al v. DISTRICT OF COLUMBIA et al 1:2014-cv-01273

In the case Hardaway et al v. District of Columbia, The District Court is refusing to provide equal protection of Hardaway rights by violating the Fourteenth Amendment of the United States Constitution. The District Court ignored Defendant’s Motion to Dismiss for over 335 days; therefore, stalling Hardaway case for a year, deliberately causing valuable evidence to be lost due to the Court indifference.

- 10/15/2014 (MOTION 9) Defendants’ Motion to Dismiss

(Ignored Motion for 335 days)

Judge Richard Leon refusing to act, proves Judge Richard Leon is deliberately violating Hardaway personal liberties and has wantonly refused to provide equal protection before the court and has behaved in a manner inconsistent which is needed for full, fair, impartial hearings; hence, causing discrimination against Plaintiffs. Judge Richard Leon violated Plaintiff's Civil Rights case to be dismissed due to lack of jurisdiction.

FORMIDABLE BARRIER /OBSTRUCTION OF JUSTICE
HARDAWAY v. DISTRICT OF COLUMBIA HOUSING AUTHORITY

In the case of "Hardaway et al v. DCHA" Judge Richard Leon and the District Court of Columbia failed to allow Plaintiffs access to the Court. On June 11, 2013, The District Court failed to act in a timely manner concerning Plaintiff's EMERGENCY TEMPORARY INJUNCTION Plaintiff would have never been attacked by landlord agents or face an illegal eviction attempt if the Court allowed Plaintiffs access to the Court. The District Court for Columbia did not hear the Emergency Temporary Injunction until Sept 9, 2013, three months after Plaintiff filed the Emergency Injunction. Judge Richard Leon unlawful deprivation of Plaintiff's federally protected rights" to access the Court by denying to hear Plaintiffs' Emergency temporary injunction to after the injury three months later. Plaintiff argue "if she was a lawyer the Court would have address her motion immediately and Plaintiff would have not suffered the illegal eviction attempt." and would have not suffered damages.

On May 7, 2013, two other individual plaintiffs and an organization filed a complaint in the United States District Court for the District of Columbia that raised claims that DCHA violated the Fair Housing Act, Americans with Disabilities Act, and Rehabilitation Act by failing to make its program accessible to people with disabilities (No. 1:13-cv-00652), which are similar to some of the claims advanced here. The district court in that case, in an opinion by Judge Colleen Kollar-Kotelly, denied DCHA's motion to dismiss, concluding that the plaintiff organization had standing and had adequately pleaded its claims, and that the individual plaintiffs' claims were not moot. *Young v. D.C. Housing Authority*, 31 F. Supp. 3d 90 (D.D.C. 2014). The parties settled and dismissed that case for (among other relief) \$350,000 in compensatory damages, attorneys' fees, and costs. Settlement Order and Attached Stipulation of Settlement, ¶8, *Young*, No. 1:13-cv-652 (D.D.C. Feb. 28, 2015) (Young District Court Docket Entries #43 and #43-1). Despite having the same argument and the same counts. *Young v DCHA* was pleaded by Attorney and *Hardaway v DCHA* was pleaded by SRL's the Court dismiss the Complaint with Prejudice for Lack of Subject Matter Jurisdiction. The two, essentially the exact same cases one with a lawyer and one with a SRL, totally different results.

19 ORDER: For the reasons stated in the Memorandum Opinion; it is hereby ordered that the defendant's 15 Motion to Dismiss or, in the Alternative for Summary Judgment is GRANTED, and it is further ordered that this matter is DISMISSED WITH PREJUDICE. This is a final appealable Order. Signed by Judge Richard J. Leon on 07/30/14. (tb,) (Entered: 07/30/2014)

Example Violations of Constitutional Rights:

The Lower Court had a duty to file pleadings in a timely fashion; however, the District Court repeatedly and deliberately "lost" Hardaway pleadings. Therefore, Hardaway started tracking her pleadings by the United States Certified mailed at a higher cost. Despite Hardaway taken this additional precaution. The District Court kept "losing" Hardaway pleadings. On August 28, 2013, after Judge Richard Leon disgracefully dismiss "Hardaway v DCHA" Complaint with Prejudice. Hardaway mailed a Certified Notice of Appeal to the Court. The Court received this Notice on August 29, 2013, according to United States Postal Service tracking. Hardaway asserts, the District Court deliberately lost the "Notice to Appeal" because Judge Richard J. Leon Ruling was extreme nonfeasance; therefore, proves Judge Richard J. Leon conspired to deny Plaintiff access to the Court by refusing to file Plaintiffs "Notice to Appeal." As a Matter of law: Judge Richard Leon and Judge Robinson are both required to construe pleadings by Plaintiff, self-represented litigants liberally. In fact, this is not a special accommodation for self-represented litigants but simply an application of the rule applied to all pleadings in the modern notice-pleading practice. That injunction applies to all types of pleadings, including briefs, but most importantly when dismissal of a complaint is considered. Judge Richard Leon has failed to follow this rule causing Plaintiff damages by not allowing to amend any of her complaints before the court dismiss the complaint.

Judge Leon published Hardaway medical records and denied Hardaway's motion to seal and published Hardaway's medical records without her permission in violations of Hardaway privacy to embarrassed because she is a person with disabilities. Hardaway petition this court, the DC Circuit Appeals Court to enforce, The Fourteenth Amendment, The Personally Controlled Electronic Health Records Act 2012, American Recovery and Reinvestment Act, ADA and Privacy Act 1988. Hardaway begged the DC Circuit Court to seal, blur, the medical records that were visible for the rule to see due to the lower court discrimination. Sadly, The DC Circuit did not read Hardaway petition or simply denied Hardaway appeal due to her SRL status; However three years later when Hardaway was represented by an attorney. The attorney filed the same plea to seal medical records. The DC Circuit quickly revised Judge Leon illegal actions of publishing Hardaway medical records. This is why it is so important for Courts to treat SRL as American citizens and read complaints rather disregarding them due to a person SRL status. In this case Hardaway v Cross State Moving, the lower court deprived the SRL Plaintiff constitutional rights by acting more like a defense lawyer and not like a neutral arbitrator as the Constitution requires, The lower Court place barriers to prevent Hardaway due process because my disability to exacerbate due to the lower court abuse. America is the greatest country on earth, but the system is broken

not because we do not have great laws but we have Judges who will not enforce the laws equally. Judges are allowed to openly deny disabled people rights because they do not have the power, the money, the influence, to enforce their civil rights; therefore the cycle of oppression of vulnerable people. In fact, in this case, the lower court Judge at more like defendant's lawyer than a neutral Judge. **My disability has worsened.** Now, not only do I have the disability, I was born with but now **diagnosed with a new disability that is the direct and an approximate result of the Courts, and the Defendant lawyers abuse. I am a person with disabilities as defined by the American with Disabilities Act; Judge Richard J. Leon declared I was a second-class citizen** by her actions depriving me rights under equal protection clauses of the 14 Amendment. In great despair, I became more and more isolated which every illegal barrier Judge Richard J. Leon was burying me with. I became more and more isolated scared to leave my house for the direct and result of Judge Leon declaring me a Second-Class American. I fear going outside because if somebody violates my rights I have nobody to turn to for help because I am nobody. Because of Judge Richard J. Leon deprived me of my Constitutional rights, I wake up in the middle of the night screaming, with night terrors, wondering when is the court going to "see me,"

Judge Richard J. Leon allows people who can not afford a lawyer to be abused by Big Business. When Business like Mr. DOSTEKAM's Cross State Moving, are breaking the law. I provide the court with altered Contact and the Lower Court to the defendant to abuse me because he hired a lawyer? The Constitution does not matter anymore? I provided the Lower Court with the different "Answer" the defendant filed with the Court compared to what the defendant served me and nothing! Why are lawyers allowed to lie to a federal court? Why are they allowed to argue alternative acts? They are allowed to argue false assumptions, mislead the court hoping the DSRL can to navigate the legal system especially when a Judge is bias against people with disabilities! The fact, the Lower Court allows people to hire a lawyer to weaponize the Civil Judicial System.... by stealing Rights from the poor and disabled.

IF JUDGE RICHARD J. LEON HAD A DUTY TO APPOINT A LAWYER UNDER TITLE I, TITLE II AND TITLE III OF THE ADA REGARDING IMPAIRMENT AS IT RELATES TO LEARNING DISABILITY.

The ADA defines "disability" as follows:

The term "disability" means, with respect to an individual –

(A) a physical or mental impairment that substantially limits one or more of the major life activities of such individual;

(B) a record of such an impairment; or

(C) being regarded as having such an impairment.

42 U.S.C. § 12102(2).

I have all three prongs A, B and C! As the definition makes clear, a person does not have to have an actual disability (that is, an impairment that substantially limits a major life activity) in order to demonstrate that she has a "disability" within the meaning of the Act. **Title II**, which this rule addresses, applies to State and local government

entities, and, in subtitle A, protects qualified individuals with disabilities from discrimination on the basis of disability in services, programs, and activities provided by State and local government entities. Title II extends the prohibition on discrimination established by section 504 of the Rehabilitation Act of 1973, as amended, 29 U.S.C. 794, to all activities of State and local governments regardless of whether these entities receive Federal financial assistance. 42 U.S.C. 12131B65. The lower court is covered by Title III of the Americans with Disabilities Act (ADA)in a place and manner accessible to persons with disabilities or offers alternative accessible arrangements for such individuals". (28 C.F.R. 36.309).Therefore the Court MUST appoint a Lawyer under the part of ADA. Court's stringent rules, restrictions, and discrimination results in me routinely denied meaningful access to the Court.

Evidence of a pattern of abuse by the federal courts against pro se

14. On **August 24th, 2015**, The District Court file Plaintiff's fee waiver to harm Plaintiffs by showing their disability income, credit card debts and other information that should not be part of this case. Plaintiff filed the fee waiver to gain access to the Court not for the Court to punish Plaintiff for filing a complaint against the District Court of Columbia. The Plaintiff's did not authorize the Court to publish on the CM/ECF system. See case number 1:2015-mc-01461 Docket Entry # 1 page 106-109. The Court went further with its malfeasance by filing the complaint and the fee waiver as below: The Court had no legal standing to file the **forma pauperis form in the Docket as page 106-107 and 108 - 109**. Jane Doe LH fee waiver is docket at page 106-107 and Jane Doe AH fee waiver is docket at page 108-109. Both fee waivers were accepted by the clerk office on August 24, 2015, and filed by the clerk (jf) on October 26, 2015. (as shown below)

Case 1:15-mc-01461-UNA Document 1-1 Filed 10/26/15 Page 108 of 109
AO 240 (Rev. 07/10) Application to Proceed in District Court Without Prepaying Fees or Costs (Short Form)

UNITED STATES DISTRICT COURT

RECEIVED
AUG 2 2015
Clerk, U.S. District & Bankruptcy
Courts for the District of Columbia

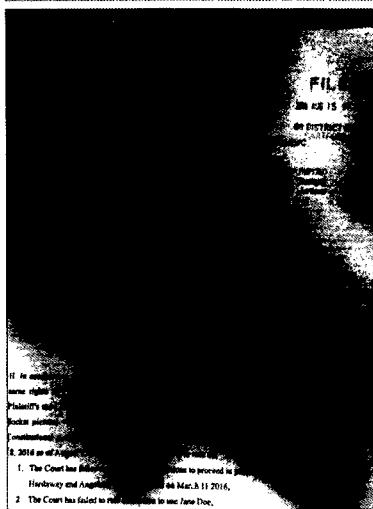


Declaration: I declare under penalty of perjury that the above information is true and understand that a false statement may result in a dismissal of my claims.

Date: 08/24/2015



Angeline Hardaway
Printed name



**THE LOWER COURT goes out of their way to Obstruct Justice by
claiming I did not file documents to deny me due process.**

Even When I take video of placing each "pleading" into the Track Priority mail envelope, then taking video of me walking to the U.S. Post Office across the street and give the envelope to the friendly USPS's worker name Margaret, or

Even When I, go to the Courthouse have the Clerk STAMP copy while in the courthouse with (an Iphone, Time & Location Stamp) on the picture of the Stamp Pleading, or

Even When I, go to the Courthouse have the Clerk STAMP copy while in the courthouse with (an Iphone, Time & Location Stamp) on the picture of the Stamp Pleading and Another picture of my sister holding the STAMP pleading IN FRONT of the Courthouse, with (an Iphone, Time & Location Stamp)!

The Lower Court denying the DSRL reasonable accommodation to use the Court filing system. But the Judge still wants to make "Minute Decision/Order" But fail to mail the Minute Decision/Order to the DSRL.formidable barriers the U.S. District Court of the District of Columbia were placing on us to receive access to the court. After a year, the Court still refused to even process our complaint against U.S. District Court of the District of Columbia. Of course, you would abuse your powers since you have the power to block a lawsuit exposing your unconstitutional violations of law. Of course, you would abuse your powers to keep your illegal actions a secret. The court couldn't deem my complaint frivolous because the abuse was already confirmed by the D.C. Circuit Court and I plead each count correctly. So, the court merely refused to process it and claimed the same false statement. The court did not receive our fee waiver. It didn't matter that fact I had a stamped copy of the court receiving the fee waiver. It didn't matter that I repeatedly gave them additional fee waivers. The court simply would ignore the fee waiver, therefore, refusing to process the complaint. I had no access to the court in D.C. So, I filed the complaint in Connecticut. The same pattern of obstruction in DC occurred in Connecticut. We filed the complaint, the reasonable accommodation request, motion to use Jane Doe, and a motion to use the CM-ECF system on March 11, 2016. Nothing was processed. So, on August 15 at 2:30pm, we personal went to the District Court of Connecticut Hartford Branch and filed a hearing request to address the due process violations since they did not process the complaint or ADA request. One copy was stamped and filed with the court, and another copy was stamped for my personal records. Because of the District Court's long history of denying pro se access to the court, I knew I needed proof of everything I did with the court. Therefore, I took a Location, Date, Time Picture of the Stamp and filed a hearing motion at the courthouse only four minutes after the hearing motions were stamped by the clerk office.

I even took a picture of my sister holding the hearing motion in front of the United States District Court to prove the I filed the motion on August 15, 2016, at 2:30 pm. As of October 11, 2016, the lower court has NOT filed the emergency hearing motion or ruled on the other five pleadings listed above. The United States District Court of Connecticut's nonfeasance is causing us damages due to discrimination because we are self-represented litigants and do not have the legal knowledge to force the lower court to follow the law. The District Court for the District of Connecticut is violating color of law by refusing to serve defendants papers as required by federal rule 24. It requires the court to serve the defendant if the party is proceeding in forma pauperis. For seven months, The United States District Court of Connecticut had blatantly refused to follow the law and allow the SRL meaning access to the court.

Hartford Federal Court Location and Time stamp on August 15, 2:24 pm. Stamp filed at 2:20 pm
was not filed until **December** after I filed a petition of writ complaint with the 2nd Cir., My whole complaint, and the hearing request was then dismissed without any access to the court for complaining to the 2nd Cir., therefore, "Proof of Conspiracy to Obstruct Justice."

The District Court Connecticut has violated the very foundation of our democracy. This is not an isolated incident of judicial abuse. Judicial abuse is a part of systemic oppression that all poor self-represented litigants face when trying to enforce our rights. The District of Connecticut and other district courts violate their own oath of office. Courts act like defense counsel against the SRL rather a neutral arbitrator as required by federal law. The 2nd Circuit confirmed Chief Judge Janet Hall's abuse on January 12, 2018, and emphasize the lower court did not have the right to act as defense counsel.

Or when, the Judge rule on Motion within hours before the defendant even mailed the Motion to the DSRL causing the DSRL to cancel surgery fly back to DC from CT to a scheduling conference that the defendant lawyer did not show up despite moving it to that date, causing the DSRL damages.

Or when the Lower Court.

These 6 - Obstruction of Justice happens all the time to DSRL because the District Courts are allowed to suspend the 14th amendment when DSLR's comes to Court help.

ISSUE JURISDICTIONAL DISCOVERY.

FACTUAL ALLEGATIONS WITH SUPPORT:

Hardaway is at Least Entitled To Jurisdictional Discovery The district court Judge Leon and Magistrate Judge Robinson stall Hardaway Complaint for over two years and refuse to allow Hardaway discovery including but limited to pre-discover, interrogatories, and deposition. These Justices overstep the boundaries by refusing to allow Hardaway meaningful access to the Court and Jurisdictional Discovery as required by law.

Due to the four years of abuse by the Federal Courts by disability as became sever. I am scared to leave my house due to the fact if something happens to me who will enforce my rights, not the cops not the courts. I am trapped and when I dare to leave my house to go to the doctors of the courts, I collapse in the streets or at my doctor's' office develop tricks, I have cause myself physical pain especially when I write these court pleading. I cause myself pain due to the fact writing about the Court's abuse cause me mental pain and I have to transfer that pain to physical. The Courts, DCHA, DC, and POLICE caused me so much pain in the last four years my body is physically breaking down. When you have my disability, people can only see it through my writing that I am "Disabled American." It does not matter how many computer programs I submitted my writing though. My disability shows, but nobody cares, I am nobody! I am nobody because it is harder for me to prove I disabled; therefore big business can take advantage of me. Therefore lower court can take advantage of me; I was shocked that Lower Court forced me to be my sister lawyer. The Chief Judge Roberson return my sister ADA complaint and send me a note telling me to add myself her Complaint. The Complaint was never filed (*I still have the original letter*) Rich people do not care about the Disabled American. Only the poor people take the time to help. My former Civil Rights lawyer told me only 1.2% victims of Civil Right discrimination file Complaints. Defendant wants to punish me for knowing my rights? I am being abused by Big business stealing my rights away. I can NOT be ABUSED me by acting more like a defence lawyer than a Judge. These color of law violations caused my mind to swirl in great to disappear, I develop Agoraphobia the fear of going outside. Due to the years of being abuse once, I became poor, and the Courts and Cops stop enforcing my Civil Rights. It is scary being on your own, knowing you are a nobody, you have no rights in the Country you were born in!

OBSTRUCTION OF JUSTICE

To prove obstruct of justice. This Appeal includes the Lower Court abuse from all three related cases (DOSTEKAM ,DCHA and DC POLICE) The Court cannot limit the scope because the Lower Court declared the **three cases LEGALLY RELATED**. Therefore, I have a right to bring the Lower Court pattern of discrimination to prove my case I was denied basic due process due to my disadvantage status. Despite what the highest law in our land is the U.S. Constitution, despite the amendments, known as the Bill of Rights, despite the Civil Rights Act of 1864, the Civil Rights Act of 1964, the Americans with Disabilities Act of 1990, the Americans with Disabilities Act of 2010 or Revised Act in 2016. Despite the enhanced protection my protected class receives. Judges like Judge Richard J. Leon repeatedly ignores due process rights and allow people like Mr. DOSTEKAM, DCHA, and DC Police to continue to abuse the weak. DC Circuit must ask itself can Disabled Self Represented Litigate truly have Meaningful Access to the Court as the Constitution demands? Especially when the Lower Court places FORMIDABLE BARRIERS to prevent DSRLs access due to their disability status? Can DSRLs have meaningful access to the Court when other Judges turn a blind eye to advert discrimination? Can in the age of the internet were SRLs have support groups to share their Federal Court's discriminatory experiences. Can the SECOND HIGHEST COURT OF THE LAND declare me a "Second Class Citizen" by ignoring five years of discrimination by Judge Richard J. Leon? Finally, after five years of oppression by the Lower Court I finally have proof Chief Judge Posner of the Seventh Circuit confirmed what I already knew, he quit his Job out of protest of the Federal Court conspiracy to deny SRLs due process rights intentionally harming millions of Americans.

- I. The Lower Court Abuse/discrimination allowed my wittiness LivingSocial.com where I brought the moving voucher to go out of business. (**Hardaway v Cross State Moving**)
- II. The Lower Court Abuse/ permitted discrimination(**Hardaway vs DC**) This discrimination the DC Police Department to violate laws of documenting abuses reported by victims of police failure to enforce minorities rights.

Despite I reported the office abuse immediately to Internal Affairs, and Police Complaint Division) I filed a FIOS in 2015 - There is no record of my complaint, there is no records of the officer's name, there is no record of the discriminatory abuse at all. - reminiscent of the Atlantic City Police Department. (

III. The Lower Court Abuse/discrimination allowed This DCHA to make a fake document 4 years later alleging, it was from my sister doctor. My sister's doctor said to my lawyers, she would testify in Court, she nor anyone in her office ever communicated with DCHA let alone gave them permission to overrule her medical evaluation of my sister accommodations needs.

is this America?

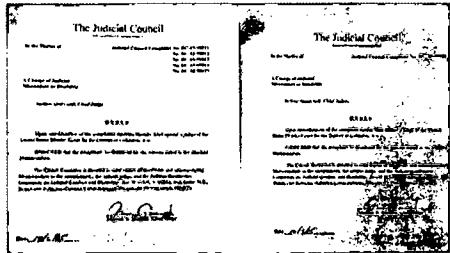
The Judge Richard Leon allows defendant's lawyer Price, and DCHA lawyers to commit perjury without any repercussions. It is like lawyers, hopes and prays that the lower court judges will believe everything they say and dismiss my case before I'm NOT allowed to prove they are lying. Richard J. Leon dismiss my case with no access discovery and degraded my evidence: These were all provable facts, with provable documentation. AND THEY LIED! No reasonable lawyer would not think to argue a lie when the disabled person is represented by a lawyer. Because I fought for her Rights. The Federal Court Did Nothing.

DCHA's lawyers admitted in open court to DC Circuit, that he lied in his 1)Motion to Dismiss and again in his 2)Appeals Brief. Did anything happen to the lawyer who committed fraud? No! Because he did it to a Second Class American.

My sister was evicted for filing a Housing Complaint, My brother was filed after 20years of outstanding performance at his Job for filing an OSHA complaint because he was working in life dangerous conditions where the company was fine and force massive changes to working conditions. My brother was labeled as a Rat and Fired! I see why oppressed people feel they have to take the law in their own hands because the law is not for people like us. Only the Rich who can afford it. There are no laws to protect the Second Class Americans, people like the defendant, DCHA, DC POLICE, Employers are all allowed to abuse us because they can afford to ignore the law. The Law does not apply to the Rich. The Rich can abuse anyone, at any time, and Courts who Job it is to enforce our Rights declare us Second Class Americans; therefore we have no rights. Because of my sister and I Second Class Status. I Place the DC Circuit was on Legal Notice on November 2013, when I filed the Interlocutory Appeal Reporting Judge Richard J. Leon discrimination including filing medical records and fee waivers, deteriorating evidence due to time, abuse of power, not following what the Constitution mandates; therefore, "blatantly thumbing his nose at the Constitution" On October 15, 2015 **I discovered October 15, 2015, while looking at the United States Appeals Court website.**

February 28, 2014: I found out why the District Court did not allow rule on my July 11, 2013, emergency protective order when my sister was in imminent and foreseeable danger. According to the email from the D.C. District Court's head clerk's office, without fear of repercussions or knowledge of admitting obstruction of justice, rich people who can afford to pay the \$400 filing fee have access to an emergency protective orders while poor people who file a fee waiver are not allowed access to emergency protective order. The poor must wait eight weeks before a judge looks at your complaint. This is a clear violation of the Equal Protection Clause of the Fourteenth Amendment. The Court is very open with it abuse because they know poor people and their rights are invisible.

Two Judicial Misconduct Complaints Adjudicate by Chief Judge Merrick Garland on October 6, 2014, and October 9, 2014. Against Judge Richard J. Leon



We were two different self-represented litigants who happened to be African American females. We were too poor to afford a lawyer. We both filed judicial misconduct complaints about Judge Richard J. Leon. Our complaints were days apart July 2, 2015, and July 6, 2015. We both were experiencing the same judicial abuse when Judge Leon denied us our legally entitled right to access the court. By Judge Leon's undue delay and failure to rule on our motions for over two years. By refusing to rule on "defendants' motion to dismiss" stalling my case for eighteen months and Ms. Smith's complaint for over two years.

Ms. Smith filed her lawsuit in June 2013, I filed my lawsuit in July 2013. Ms. Smith filed her judicial misconduct complaint on July 2, 2015, and my judicial misconduct complaint on July 6, 2015. Ms. Smith Judicial misconduct complaint was dismissed on October 6, 2015, my complaint was dismissed on October 9, 2015. Both women are African American. Both women are poor. Both women filed a civil right action against a D.C. government agency. Chief Judge Merrick Garland ruled on both judicial misconduct complaints. Chief Judge Garland ruled that we didn't cite a pattern of discrimination happening to other pro se litigants or African American women who had been denied due process of the law by Judge Leon. Yet both cases were dismissed in summary with prejudice without discover or any meaningful access to the court. Chief Judge Garland denied our pleas for help three days apart. Ultimately, Chief Judge Garland was complicit in Judge Leon's. This judicial abuse is normal for the voiceless. This judicial abuse is what they want the outside world to believe. Voiceless Americans appear to have received due process of the law when, in actuality, the complaint was stalled for years by their refusal to rule on our motions. It looks like the case has been in the court system for years, but it didn't really have any access. This practice causes irreparable harm to the self-represented litigants' complaints because of the deterioration of time destroys the evidence. Let's name it triple DDD: delay, deteriorate, and dismiss. Many federal

courts across American implement this practice. When we complain, it falls on deaf ears. Being poor makes a difference in how you're treated. Let's face it. These judges don't believe we deserve Constitutional rights. Judges will argue that the majority of self-represented litigants' complaints are meritless which can be compared to saying undocumented immigrants are MS-13 members. Anecdotes and stereotypes shouldn't dictate our justice system. Some judges complain about doing their job with self-represented litigants like our demand for justice cause them unjust suffering. So their remedy is to deny us access. Why doesn't the court system appoint a lawyer or friend of the court, *amicus curiae*, to poor self-represented litigants or to litigants who can't read or write when the complaint is about civil rights enforcement? It is a better remedy than merely denying us justice.

I filed a second judicial misconduct complaint against Judge Richard J. Leon. This time I included the abuse Ms. Smith suffered to illustrate that Judge Leon had a pattern of judicial abuse towards African Americans and poor self-represented litigants. I used the legal phrase "lazy judge" to describe his decision to stall my complaint for two years without any access to the court. Chief Judge Merrick Garland belittled me for suggesting Judge Leon was a "lazy judge" and claimed that "maybe he did not have time to rule." Note: I filed a motion for Judge Leon to recuse himself or transfer the case to a Magistrate Judge, but Judge Leon refused to recuse himself. Chief Judge Garland was offended. I hurt his fragile ego. If anyone should be offended is me! My rights were being disregarded due to my status and that I wasn't given access to my legally entitled rights?

Judicial misconduct complaint orders are dumped onto circuit court websites as scanned documents that can't be searched by names, keywords or any other content that a public citizen may seek to find. These orders are stored as a series of numbered files with no indication of the allegations, the person filing, or the outcome. This practice makes it even more difficult to identify the most severe misconduct cases that are hidden among the opaque lists of documents because each order must be opened and individually read to gain even minimal information about the nature of the complaint. Despite the court's attempts to cover up judicial abuse, I still was able to find Ms. Smith's, an African American woman, complaint about the same judge, during the same time frame, and for the same two years of judicial abuse that I suffered. Judge Garland knew of Judge Leon willful denial of poor African American women's equal access compared to the access he gave whites litigants who could afford a lawyer. Having experienced this is a burden and a feeling of sorrow, but this honest talk sheds some light on the secret of judicial misconduct. No one seems to care if these judges only abuse Americans who are too poor to afford a lawyer, too disabled to speak up, and too Black to be seen. The judges who believe they are above the rule of law want to keep this secret out of the public view. So these stories will never be brought to light. Their voices will never be heard.

June 28, 2016

4:15 PM

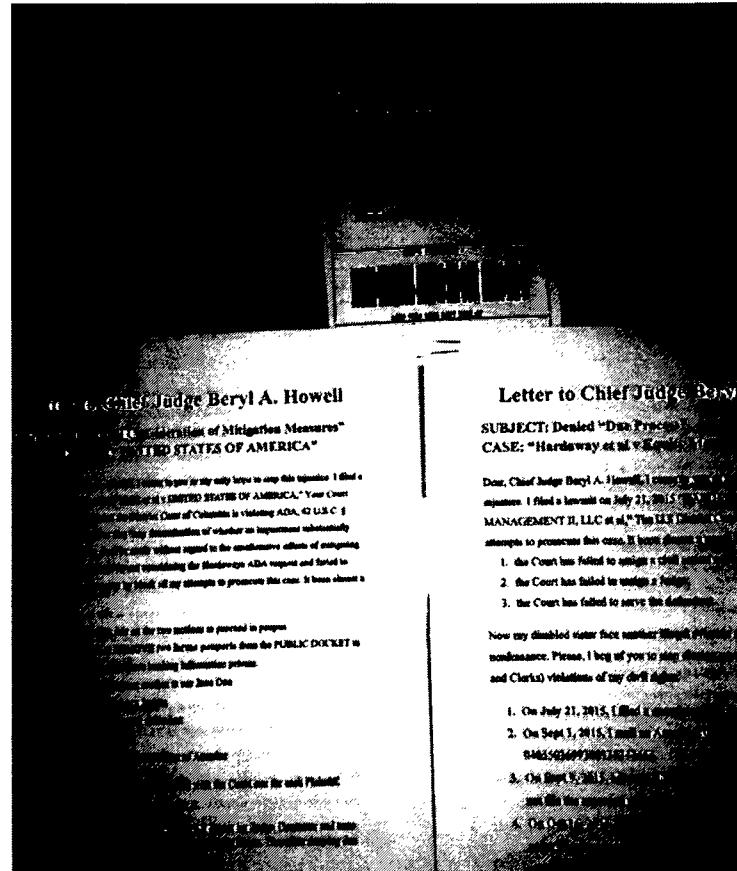
Edit

LEGAL NOTICE OF COLOR OF LAW

On **June 28, 2016**, I thought my nightmare was over, a new female chief judge. I am sure she was going to stop these civil rights violations I have been suffering under the hands of Chief Judge Richard Roberts, Judge Richard J. Leon, and complicit Chief Judge Merrick Garland. Nope! Chief Judge Beryl A. Howell ignored my "legal notice" warnings of these "color of law violations."

This is not an isolated incident of judicial abuse. Judicial abuse is a part of the systemic oppression that all poor, self-represented litigants face when trying to enforce their rights. The court wants to pretend that the Americans with Disabilities Act, Sec 504 Rehabilitation Act of 1973, and the Fourteenth Amendment do not supersede the biases that these judges believe. I have indisputable proof that there are federal courts across the United States that are convinced they are above the law. This is all due to the lack of oversight. Every time, I prove judicial abuse, the court justifies their abuse with the term, "It is not serious enough," but the court has never abused a person who can afford a lawyer. The victim of judicial abuse is always poor and their plea is always considered never "serious enough."

These judges are destroying people lives. Since June 30, 2018, my complaint has never been served to the defendant. The lower court has repeatedly violated Title II of the Americans with Disabilities Act, Section 504 of the Rehabilitation Act, the Equal Protection Clause of the Fourteenth Amendment and other federal and state laws because they mishandled private, confidential medical records that were only given to the court for facilitating a reasonable accommodation request. In addition, they refused to process a fee waiver even when we were able to prove that the court received it.



HARDAWAY VS CITY OF HARTFORD

He did save lives, (it would have been an explosion that killed many. I still have the pictures) but our government failed to protect him from the City of Hartford's agents who were abusing him for being a snitch. Yet, after twenty years of working for the City of Hartford without a single incident report, he was labeled a troublemaker and fired. I thought that the United States Government wanted people to report illegal actions. Judging by the behavior of the City of Hartford and the federal court, I thought wrong.

On November 11, 2013, my brother sent me pictures of the dangerous working condition that would cause an explosion. Many Connecticut residents would have died. It was a foreseeable fact, like the foreseeable danger my sister was in on July 2013 that the D.C. federal court ignored. I guess working in a dangerous work environment is okay if you are black and if the people who are in danger in the City of Hartford are a majority Black and brown. It doesn't matter because it is only their lives that are in danger. I was forced to step in, like I always do, to protect my family. I stupidly thought our government cared about American lives. I was wrong. Not only does our local government not care about American lives, but our federal court doesn't either. My brother didn't have to report the same thing to the Connecticut Department of Labor's Division of Occupational Safety and Health, CONN-OSHA, but he did it out of concern for other Americans' safety.

In addition to seeing a dangerous situation that would likely lead to an explosion caused by the City of Hartford. My brother reported the Department of Public Works employees were improperly storing diesel fuel and fuel powered tools in truck cabs. Department of Public Works employees were smoking tobacco products in the cabs of trucks where fuel and fuel powered tools were being stored and were using diesel fuel to remove asphalt from asphalt-covered portable tools when on road jobs. Then, they operated the truck cabs immediately after doing so and while these employees' clothes were soaked with fuel.

He tried to warn the Department and showed the supervisor, a white male, photos of these life-threatening safety violations, and reported that these safety violations were endangering his life, the lives of other employees, and the lives of members of the public. In response, his supervisor at the Department of Public Works told him to "stop acting like a girl and go back to work" and took no action to correct the safety violations. I was forced to step in and report online to OSHA on November 18, 2013, I voluntarily reported the hazardous and life-threatening conditions Curtis had previously observed and reported to his Department of Public Works supervisor, to the Connecticut Department of Labor's Division of Occupational Safety and Health, out of fear for his life and safety, as well as the lives and safety of others City employees and members of the public. OSHA took my brother's complaint seriously, and on November 29, 2013, CONN-OSHA performed a formal inspection of working conditions at the Department of Public Works as a result of the complaint my

brother filed with CONN-OSHA. After that, they issued a severe citation to the City of Hartford Department of Public Works, including the imposition of substantial monetary fines and a requirement that the Department of Public Works implements corrective actions. CONN-OSHA, CONN-OSHA stop the explosive danger because my brother reported to OSHA required the City of Hartford Department of Public Works to implement a safety department, to implement additional employee training, and to use a special solvent instead of fuel to remove asphalt from tools used by their employees.

The City's Department of Public Works supervisors knew it was Curtis who filed a complaint with CONN-OSHA because he was the only City employee at Department of Public Works who had previously complained to his supervisors about the dangerous work environment and conditions investigated by CONN-OSHA.

Curtis' white male supervisor was upset with my brother for having filed the complaint with CONN-OSHA and repeatedly threatened to fire him. My brother was labeled a "troublemaker," a "gay/girl," called racial slurs, and told to "play ball" and stop asking safety questions. He was told to stop reporting safety issues.

Other Department of Public Works employees with whom Curtis regularly worked in the field became aware that he had filed the complaint with CONN-OSHA. He was immediately threatened, harassed and intimidated. Curtis was outcast and labeled as "the snitch" who complained to OSHA and called "a bitch," "gay," and "a person that will complain to OSHA," Curtis' supervisors at the Department of Public Works were aware of all of this harassment. No shift leaders or supervisors at the Department of Public Works wanted to work with him after my brother filed the complaint with CONN-OSHA on November 2013. My brother was labeled a "troublemaker," he was denied the opportunity to work overtime and/or work certain jobs as he had done prior to filing the complaint with CONN-OSHA and he earned substantially less income, about 23.6% less than in prior years working for City of Hartford's Department of Public Works.

I reported the abuse to OSHA and the Labor Department for my brother. However, our complaints went on deaf ears because the Department of Public Works continues to abuse my brother with no end in sight. The next week after I filed the second complaint on August 4, 2015. My brother was demoted by Department of Public Works from Maintainer III to Maintainer I and his regular wage rate was reduced to less than he had earned as a Maintainer III. Curtis had never been previously demoted while employed by City as a Department of Public Works Maintainer. From then on, because I filed a complaint for my brother with CONN-OSHA, other employees at the Department of Public Works continued to harass him and call him derogatory names. He was expected by his supervisors to work in dangerous working environments. Curtis's employment was suspended. Since Curtis complained to CONN-OSHA about safety violations and dangerous working conditions, for the first time, certain other City employees at the Department of Public Works started to complain about safety violations and safety concerns. My brother was further labeled a "troublemaker" by his supervisors at Department of Public Works, who grew angrier with Curtis for having informed other City employees that

they did not have to risk their lives or the lives of others because of dangerous and hazardous work conditions and work practices at Department of Public Works.

On August 5, 2014, Curtis was told by one of his white male supervisors at that if he stopped reporting safety violations, his demotion would "go away" and that Curtis's ability to work overtime would be reinstated. Once again, on August 5, 2014, I filed a whistleblower complaint with the Connecticut Department of Labor, CTDOL, for my brother in which I reported that, as a result of having filed a complaint with CONN-OSHA on November 23, 2013, my brother had been and continued to be subjected to retaliation, harassment, demotion and reduced work hours, discrimination and threats from his supervisors at the Department of Public Works. Thereafter, Curtis' supervisors at Department of Public Works were upset over having additional work duties as a result of the Department having to comply with the new safety rules imposed on them by CONN-OSHA because of the complaint. Additionally, Curtis' supervisors at became aware that he had filed a whistleblower retaliation complaint with CTDOL. On or about Feb 10, 2015, his supervisors told him to stop reporting safety violations, to "stop acting like a bitch running to OSHA like a little girl," and that if he would stop reporting safety issues to OSHA he would be treated normally by others at the Department of Public Works once again.

On or about February 11, 2015, I filed another complaint with CTDOL, informing CTDOL of the retaliation against my brother, including that he had been demoted, threatened, suspended, harassed and intimidated since filing a safety complaint with CONN-OSHA. I told them that he had been placed on probation because his supervisors considered him to be a "snitch." I wrote that my brother no longer felt safe while working for the City of Hartford's Department of Public Works, but I wrote that as him. I filed all these warnings in email as proof that I tried to stop this abuse, proof that nobody cares, just like nobody cared when my servile disabled sister was denied DCHA's services or the fact her landlord tried to illegally evict her. This was just like when the police did not care to enforce her landlord-tenant rights.

Approximately three months later, the city terminated Curtis' employment. How could this have happened? What happened to the laws that were enacted to protect us? Why are we invisible? I felt helpless! I tried hard to protect my sister in July 2013, and my government turned its back on us! I tried hard to protect my brother in February 2015, and my government turned its back on us! I live in a world where civil rights laws do not apply to us. My brother was a model employee who had never been disciplined before he filed a safety report before he saved lives by filing that safety report.

You may say, how do you know he saved lives? Guess what happened when he didn't report the foreseeable danger at his new job? Someone died. It was preventable. It was foreseeable, and it occurred due to judicial abuse. Due to Chief Judge Janet C. Hall's refusal to recognize my brother as an American with constitutional protection with the right to due process, with the right to access the court. Due to obstruction of justice, Tatiana Vedentsova died on February 9, 2018. After months of contacting the American Civil Liberties Union, ACLU, and other civil rights lawyers, I filed a complaint for my brother on February 1, 2016, Nobody cared. The only time poor people are allowed access to the court is when they get

into a car accident. Then, everyone wants to be the Vulnerable American lawyer because then lawyers are guaranteed to get paid. Access to justice should not cost money. We have a Constitutional right to it. We cannot be simply denied civil rights. Then, we get nothing but Judge Judy access to justice. We can take our case to T.V. court and get yelled at by a T.V. judge, or we can forfeit our rights. We sure can't have our civil rights enforced. Enforcement involves the federal court and, of course, the federal courts don't see us as human. The federal court tries to dehumanize us. Federal judges call Vulnerable American's cases a nuisance. They don't even bother to read it. If they read my brother's case, How could they just place formidable barrier after barrier and deny access to the court?

Of course just like the D.C. federal court, federal court judges, liberal or conservative, democrat appointee or republican appointee all have one thing in common. They all discriminate against the weakest members of society. Don't take my word for it. Just look at the docket. The District Court for the District of Connecticut abused indigent people by improperly using the review of *Forma Pauperis* Complaints to take advantage of self- represented litigant's. The District Court of Connecticut purposely penalizes the poor who cannot afford to pay the court cost or attorney fees; therefore taking advantage of SRL's lack of legal education and holding them to an evidentiary standard at a complaint stage of the case. By holding disabled and poor self- represented litigant to an evidentiary standard, it causes SRL to file extremely long complaints in an attempt to jump over the barriers the court place on pro se. It's like the court is abusing the poor by moving the finish line with the "review of *forma pauperis*," a barrier only reserved for the poor. How can you have one set of rules for people who can afford the \$450 court fee and another set of rules for the poor? What happened to equal access? According to federal rules, the SRL's Complaint only has to be plausible and not frivolous. The District Court of Connecticut allows magistrate judges to violate the color of law and refuse to allow self- represented litigants access to the court. Magistrate judges repeatedly force self- represented litigants to amend the complaint to a professional lawyer standard. Our complaint meets and exceeds the standards governing pro se's complaints contemplated by the Supreme Court binding precedent governing self-represented litigants. Magistrate Judge Sarah A. L. Merriam is willfully discriminating against all SRLs complaints. I could not find one SRL complaint she did not violate. Spoiler Alert. The 2nd Circuit Court confirmed this statement as true on January 12, 2018. In an unanimous verdict, the 2nd Circuit Court ruled that Chief Judge Janet C. Hall acted as a defense lawyer and failed to due process, failed to accept all facts as true in the complaint stage, and acted with an "abuse of discretion." It was very clear that the court failed to provide basic civil rights, but did not think I would file an appeal. The additional steps the court places on the poor are to prevent us access. - I wrote the following directly to Chief Judge Janet C. Hall.

-- "If the Court allows him meaningful access, I would have brought up several current employees of the Hartford Department of Public Works to testify that their boss told them, "see what happened to Curtis it will be you next." I wrote in my brother 3rd Amended Complaint, "I witness danger in my current Job, but the deprivation of rights, in this case, screams loud and clear my local and federal government does not care. So when a little white, blond hair, blue eye, a baby is killed due to the

*defendant's willfully disregard for safety. Do not cry! I tried warning my government. But you did not care!" I wrote, The federal government (this court) and the local government (the defendant) declared me a second-class citizen and took food away from my kids. The government says- "see something say something" I saw, I took pictures, I said something and got fired! After 20 years, with not one disciplinary action. The Court punish poor people for being indigent with the "review of proceeding in *Forma Pauperis* complaints" This discriminatory Connecticut rule, was not designed for the Court to act as a defense lawyer. The rule was design to dismiss an obvious incoherent complaint. Not grammar mistakes! For crazy complaints like a spaceship took me to Mars! The Court empowers abusers like the defendant to break the law; The Court rewards abusers like the defendant by acting as defendant's lawyers and arguing the case for them. The Court caused irreparable harm by delaying Justice, by delaying access to discovery, by deteriorating evidence due to time. The Court empowers the abusers like the defendant by telling OSHA's Whistleblowers you can not afford a lawyer thereby you are declared second-class citizens, whereby you're American Rights are evoked. Your Judicial abuse is hurting real people."*

I wrote my brother's complaint because our family's inherited disability prevents him to advocate for himself. My brother's children are the first generation that our disability did not pass down to and Chief Judge Janet C. Hall's judicial abuse caused irreparable harm to my nephew and niece education.

She did not care about the people she was hurting when she denied them access to the court. The chief judge blocked us access to pre-discovery or discovery in violation of rule 26 and basic due process rights to equal access to the court. All Americans are at least entitled to jurisdictional discovery even if the our allegations were not sufficient for standing, See *Obama v. Klayman*, 800 F.3d 559, 561, 565, 568-569 (D.C. Cir. 2015) which remanded a decision concerning whether limited discovery to explore jurisdictional facts pertaining to standing would be appropriate. Without access to discovery, the court caused irreparable harm to self-represented litigant's complaints by causing evidence to deteriorate over time. The most damaging part is the willful abuse of power causes irreparable harm. People die, people move, the evidence is lost forever, and it is all because of an abusive judge.

If I am allowed to access this court, I will detail how this abuse destroyed many disabled people's lives. She didn't care she was causing irreparable harm to my brother's complaint by denying him access to discovery. Even after, the 2nd Circuit ruled Chief Judge Janet Hall abused her discretion. Yet, Chief Judge Janet Hall continued to rule without precedent, rules or regulations. She believed that she was above the law and that the Americans with Disabilities Act did not apply to her indirect violations of the Supreme Court precedent.

You know a Judge is lying when they don't cite any legal reason, laws, or precedent. They are just using their own misguided opinion to tell them who gets equal access to the court and who gets treated like trash. This was a simple request,. Move the case back to Hartford where both parties are from. Stop playing musical chairs with the courthouse. Chief Judge Janet Hall is known for moving poor self represented litigant complaints from Hartford to New Haven scheduling a hearing in New Haven, canceling the hearing then moving the hearing to Bridgeport without telling the poor, disabled self represented litigant's that he have the right to a phone hearing. Again, taking advantage of the poor and the disabled.

March 30, 2018 at 10:38 AM:

The following transaction was entered on 3/30/2018 at 10:38 AM EDT and filed on 3/30/2018

Case Name: Hardaway v. Hartford Public Works Department

Case Number: 3:16-cv-00115-JCH

Filer:

Document Number: 51 (No document attached)

Docket Text:

ORDER: Plaintiffs Request for Reasonable Accommodation under the Americans with Disabilities Act (ADA) (Doc. No. [42]) is denied. The ADA, Title II, does prevent discrimination by public entities in the provision of services but public entity is defined as state or local government entities. The federal government, of which the federal courts are a branch, are not covered by the ADA. This denial is without prejudice to renew if this case proceeds to trial. Before that occurs, the court will make every effort to schedule any events to occur by telephone (on the record). SO ORDERED by Judge Janet C. Hall on 3/30/2018.(DeRubeis, B.)

Chief Judge Janet Hall, is not only ridiculous but she spits in the face of the rule of law. Government official Janet Hall believes she does not have to obey ADA; thus, the court does not have to obey the civil rights act of 1964, Sec 504 Rehabilitation Act of 1973 or the constitution of the United States. When are judges allowed to pick and choose the laws they obey? The Court ableism discrimination is akin to discrimination against black people. Another example of when judges declared that state laws supersede federal law was when the state of Kansas said they didn't have to enforce Brown v. Board of Education. This abuse is a great example of why Wendy Vitter disagreed with the result in Brown v. Board of Education. Vitter would say she would uphold the Supreme Court precedents. It isn't wrong to assume that just like Chief Judge Janet Hall, Chief Judge Roberts, Chief Judge Chasanow, and Judge Richard J. Leon, once confirmed, she is going to violate the vulnerable class's rights because there is no oversight. Judges believe they are above the law.

Chief Judge Janet C. Hall's judicial abuse is discouraged my brother from filing a new OSHA complaint with his new job. I warned the court in great detail of the foreseeable danger. Yet, the Court treated me like a second-class citizen and dismissed my complaint without even bothering to serve it to the defendant, all because I'd filed a fee waiver. This is a human rights problem. The District Court has a history of disproportionately denying the rights of people with disabilities, people of color, and other Vulnerable Americans. This is not an opinion, let alone some far-out conspiracy. It's a fact. Just look at the docket or the misconduct complaints. Everyday Americans who are too poor to hire a lawyer — too poor to pay the court fee — are being deprived of justice. And this abuse is happening every day in federal courts across America.

February 9, 2018, Tatiana Vedentsova, died. In the way, I predicted how she would die. I told Chief Judge Janet C. Hall that Windsor Sanitation would kill someone and months later it did. Even though I warned them, the court did not care about Americans safety.

December 27, 2017: I tried to figure out a way to report immediate danger without getting my brother fired. So, I wrote to Senator Blumenthal, who serves on the Judiciary Committee. It is his duty to oversee the federal courts. It's his duty to protect his constituents from immediate harm. Four weeks after writing to Senator Blumenthal, Tatiana Vedentsova died. To this day, Senator Blumenthal's team has never gotten in touch with me to advise me on how to report a hazard without getting fired. (Attorney General Blumenthal, presented me with the American Legion Speech Award on the Constitution, but now I am voiceless. Now, he does not see me.) It made my brother sick that Tatiana Vedentsova's

death was preventable; so, my brother gave his job two-weeks notice; "I cannot watch another death." Why do we care about saving Connecticut residents' lives more than the people who are paid to care?

March 29, 2015: I was writing pleadings from a hospital bed, high on medication after surgery. I was determined to protect my sister's rights.

October 19, 2016, I was working for days on a pleading. I stop for my doctor's appointment. I did not make it; I fainted. I woke up in the hospital with an I.V. I asked my sister for a pen. My sister took this picture because she knew the fact I would not give up and allow Judge Richard J. Leon to steal our rights.

Two months later, Judge Leon implement Delay, Deteriorate Dismissed. August 25, 2015: Judge Leon ruled, a year and eight months after the fact, with a defendant's motion to dismiss. We had no access to discovery, no pre-discovery. Nothing. Judge Leon once again decided to abuse us and violated the law by ruling we had standing, but failed to state a claim. Common, the defendant, never argued that I did not state a claim. The defendant only argued we didn't have standing. Therefore, Judge Leon was once again not a neutral arbitrator but was a lawyer for the defendant arguing and ruling on a motion that the defendant didn't file.

I didn't know that Judge Leon had done this until April 2016. A Georgetown Law Clinic student brought this to the teacher's attention say that, once again, Judge Leon was making a ruling on something the defendant didn't argue. "How can he do this?" Of course, a disabled self-represented litigant cannot write a complaint to the same level as a lawyer. I could only write a simple summary of what happened. So, I did just that. Judge Leon agreed I did that by ruling I had standing. He also ruled that I did not "state a claim." I did not write the complaint to the same sophistication as a highly trained lawyer. By ruling my complaint did not "state a claim," after I clearly wrote the horrible events that occurred during the D.C. police refusal to enforce my legally entitled rights, Judge Leon could say I did not "state a claim." Of course, I appealed. Will the D.C. circuit court stop this abuse of humanity and overrule Judge Leon once again? Receiving justice is like shooting dice. I was outraged! It was like people with disabilities are treated inhumanely and unworthy to take up space on Earth. How can I conclude anything differently?

I have grappled with my sadness, my despair, and even my hopelessness, trying to make sense of it all. How did I get here? What did we do to deserve this? The abuse we suffered from DCHA, the court, and the police was a perfect storm of incompetence meets indifference meets bias. It was a great injustice that we were denied access to the rights we are legally entitled to from the With all this suffering, I am unwavering.-, I will not forfeit my rights for three reasons.

First, my mother was born a slave 100 years after slavery was outlawed because judges and cops refused to enforce the law in Blackstock, SC in the 1960's. Most people believe slavery ended in 1865; - however, for many African Americans living in the deep south, slavery continued way into the late 1960's. One may ask, how could this happen when there are laws outlawing slavery. How can this happen with the Emancipation Proclamation, The Fourteenth Amendment, The Civil Rights Act of 1866 and 1875, the Ku Klux Act 1871? It happened because the people whose job it is to enforce the law turn

a blind to the law. It happens when you have a combination of racism and ableism. Thousands of African Americans in the deep south had no idea they were free. These people were forced to work, violently tortured, and raped. Sad to say, my mother was one of these people who was born into slavery 100 years after the Emancipation Proclamation. My family was forced to work, beaten and raped. The men and boys were separated from the women and supplied an endless amount of alcohol when it was time to rape the women. My uncle was 12 years old when the white men would get him drunk. My uncle died from alcohol. My mother was the product of one of those nights. Disability is an inherited trait on my mother side of the family, and powerful people took advantage of my voiceless family. My mother lived in the slave shack where her family had lived since the 1800's. My mother picked cotton where her ancestors had pick cotton since the 1800's. I grew up hearing these stories about my mother being born a slave and just thought they were crazy stories parents tell to emphasize how hard they had it growing up.

On February 25, 2017, at the National African American Museum. My mother explained, how the slave shack in the museum was similar to her home how the shack didn't have windows, just shutters. My mother explained how the cotton gin worked. How did my mother know how these slave artifacts work? For the first time I realized, those stories, - I was told growing up were true. Not only was it true, but it also was not unusual in the deep south. Many African Americans were still Slaves in the late 1960's. Police and judges whose jobs it was to enforce my mother's rights, not turn a blind eye; sit back; ignore what they were seeing; and did nothing. My mother's family's 14th Amendment rights were suspended from the 1930s-1960s. My mother escaped slavery and ran to the north, like so many African- Americans in the 1860s, except she was running in the 1960s and slavery had been abolished for a hundred years. The suspension of the 14th amendment also happened on my father's side.

The second reason why I refuse to forfeit my rights is because my great uncle was lynched; My grandfather was forced to flee Georgia because my family farm was making too much money for Black people in the 1950's. These abuses were chronicled in the movie "Murder in Coweta County," where my great uncle was lynched, and my grandfather had to escape the KKK. That county was made up of judges and police officers and the sick Sheriff who was named in the movie. My grandfather barely escaped with his life and was forced to forfeit his massive farm to the KKK. This is what happens when the legal system does not enforce the 14th amendment rights of all Americans. The third reason why I refuse to forfeit my rights is because, on February 12, 1946, my great uncle, Isaac Woodard Jr., was in uniform when he was attacked and blinded by South Carolina police after being honorably discharged from the U.S. Army. - Orson Welles said, - "If Woodard had to lose his sight to show us that we need those laws, the least that we can do for him is to make those laws and make them now and make them stick" The DC courts and the DC police had both dragged their feet refused to allow us access to justice. Just like the federal government refused to investigate the cops who tried to kill my great-

uncle after serving his country. This is crazy! Its 72 years later and my family is still being abused by the people who are paid to protect our rights?

With judges like Judge Richard J. Leon and other judges who are complicit in judicial abuse, deprivation of rights is not new to my family. It seems my family been a victim of complicity since the being of America.

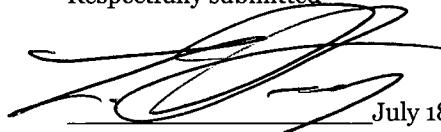
Today, I say "NO MORE!" I refuse to allow judges to declare me a second-class citizen by refusing to enforce my rights, refusing to enforce the law in 2018. Lack of oversight causes self-represented litigants' complaints irreparable harm by not having access to timely discovery, only receiving discovery after we win the appeal. Then the case is reversed and remanded back to the same bias judge. Only then, we are allowed a "watered-down version of justice" or "no justice" at all. My family's inherited disability, caused predators to take advantage of my mother by forcing her to live in the same slave shack and, pick the same cotton her ancestors had picked since the 1800's.

My mother family was a victim of our inherited disability and the inherited racism that is ingrained in the DNA of America. This racism allowed powerful people, to keep enslaving an African Americans for 100 years after slavery was over. It is because powerful people, like judges, and police, who have a duty to enforce my family's rights from 1865-1965, took advantage of my family disabilities. This same practice is being used today. Vulnerable people lives are being destroyed, - Americans are dying because powerful people are not enforcing rights in 2018.

CONCLUSION

The petition for a writ of certiorari should be granted. After five years with no access to court, no access to discovery, no access to jurisdiction discovery. I should finally be allowed meaningful access to the court rather than this Jim Crow access to the court. It is 2018. When is Jim Crow going to end?

Respectfully submitted



July 18, 2018

Lena Hardaway