

No. \_\_\_\_\_

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

VALERIE ARROYO

*Petitioner,*

V.

DANIEL J ZAMORA, ET. AL

*Defendant,*

\*\*\*\*\*  
*On Petition for Writ of Certiorari from the United States District Court  
of the Fourth Circuit Court*  
\*\*\*\*\*

**PETITION FOR WRIT OF CERIORARI**  
\*\*\*\*\*

VALERIE ARROYO, PLAINTIFF, PRO SE  
617 SPRINGFIELD DRIVE, NW  
CONCORD, NC 28027  
TELEPHONE: 704-506-1526

## **QUESTIONS PRESENTED**

- I. Did the lower tribunal, federal or state court, federal or state agencies, or employees' actions, conduct or interference were unconstitutional through deprivation the color of the law, the Plaintiff's civil right, deprivation the color of the law, and due process during two judicial proceedings?
- II. Did the lower tribunal or state court decision conflict with the importance of federal questions, or failure to act appropriately according to the 28 U.S.C. § 1331?
- III. Did the lower tribunal or state court interference; decisions violate or deprive the Plaintiff's right to exercise any of the Amendments of the Bill of Rights of the United States?
- IV. Did the federal tribunal, state court, or state agencies, or employees of United States Agency actions, conduct, or interference fail to address the original complaint?
- V. Did the federal tribunal, state court, or state agencies, or employees' actions, conduct or interference violate the Sovereign Immunity Act?

## **LIST OF PARTIES**

All parties do not appear in the caption of the case on the cover page, a list of all parties to the proceeding in the court whose judgment is, the subject of this petition is as follows:

Plaintiff VALERIE ARROYO, is an adult citizen and all times pertinent to this complaint was a resident of the County of Cabarrus

Defendant DANIEL J ZAMORA is a married man and all times pertinent to this complaint is a resident of the County of Mecklenburg; license attorney through the North Carolina State Bar Association is a duly constituted governmental entity in the State of North Carolina. Defendant Daniel J. Zamora responsible for performing legal constitutional conduct as an attorney, business owner, and member, and organizer of several business offering legal services established under the North Carolina Secretary of State Corporations, and in the public behalf

Defendant CHAD T. DIAMOND is a single man and all times pertinent to this complaint is a resident of the County of Mecklenburg, a license attorney through the North Carolina Bar Association, is a duly constituted governmental entity in the State of North Carolina. Defendant Chad T. Diamond responsible for performing legal constitutional conduct as an attorney of the State of North Carolina, and public behalf

Defendant NORTH CAROLINA STATE BAR ASSOCIATION is a duly constituted governmental entity in the State of North Carolina. The agencies responsible for constitutional conduct, disciplinary, and investigate, or sanction; oversees, responsible for making sure all attorneys' action or conduct is abiding by the constitutional rules, procedures, and the cannon, and judicial, and administration law by all attorneys on public behalf

Defendant MECKLENBURG COUNTY SUPERIOR COURT CIVIL DIVISION is a duly constituted governmental entity in the State of North Carolina responsible for constitutional conduct; abide by the federal and state laws of the United States of America, and on public behalf

Defendant NORTH CAROLINA JUDICIAL STANDARD COMMISSIONER is a duly constituted governmental entity in the State of North Carolina, responsible for constitutional conduct, disciplinary, and investigate, or overseeing; commission over the all Judges, attorneys, and clerk of court or judicial agencies as an agency of the United States of America, and on the public behalf

Defendant NORTH CAROLINA ETHICS COMMISSION, formerly transferred BIPARTISAN STATE BOARD OF ELECTIONS and ETHICS ENFORCEMENT as of December 16, 2016 is a duly constituted governmental entity in the State of North Carolina responsible for constitutional conduct on the public behalf, as an agency of the United States of America

Defendant STATE OF NORTH CAROLINA, C/O DEPARTMENT OF JUSTICE, is a duly constituted federal and state governmental entity of the State of North Carolina, responsible for constitutional conduct on the public behalf, and as a federal and state agency of the United States of America.

HONORABLE HUGHES B LEWIS, is a Superior Judge employed by the Mecklenburg County Superior Court locate in the County of Mecklenburg in the State of North Carolina and responsible for constitutional conduct as a Judge in the Mecklenburg County Superior Civil Court Division, and on the public behalf

HONORABLE FRANK D WHITNEY, is a Chief Judge employed by the United States District Court of the Western Division in the Charlotte Division, which is in the State of North Carolina responsible for constitutional conduct as a Chief Judge in the U.S. District Court of the Western Division in the Charlotte Division, and on the public behalf

MAGISTRATE JUDGE DAVID C KESSLER, is a Magistrate Judge employed by the United States District Court of the Western Division in the Charlotte Division, which is in the State of North Carolina is a duly constitute federal and state governmental entity of the United States of America. Responsible for constitutional conduct as a Magistrate in the U.S. District Court of the Western Division in the Charlotte Division, and on the public's behalf

U. S. COURT OF APPEALS OF THE FOURTH CIRCUIT is a duly constituted federal and state agency; locate in the State of Virginia as an appellate agency of the United States of America. Responsible for constitutional conduct as an appellate agency on public behalf, and duty to offer a resolution, discipline, or investigate or provide equal justice to all under the United State of America

ATTORNEY GENERAL JOSHUA H. STEIN is an elected attorney general by the citizens of the State of North, serves in the North Carolina Department of Justice, which is a duly constituted federal and state agency locate in the State of North Carolina. Responsible for constitutional conduct as an elected attorney general in the North Carolina Department of Justice is an agency of the United States of America

CIRCUIT JUDGES MOTZ, is a Judge employed by the United States Court of Appeals for the Fourth Circuit, locate in the State of Virginia as an appellate Circuit Judge responsible for constitutional conduct on public behalf, as an agency of the United States of America

CIRCUIT JUDGE KEENAN, is a Judge employed by the United States Court of Appeals for the Fourth Circuit, locate in the State of Virginia as an appellate Circuit Judge responsible for constitutional conduct on public behalf, as an agency of the United States of America

CIRCUIT JUDGE FLOYD, is a Judge employed by the United States Court of Appeals for the Fourth Circuit, locate in the State of Virginia as an appellate Circuit Judge responsible for constitutional conduct as an appellate Circuit Judge as an agency of the United States of America, and public behalf

## TABLE OF CONTENTS

OPINION.....	Below Pg. 8-10
JURISDICTION .....	Pg. 11
CONSTITUTIONAL AND STATUTORY PROVISION INVOLVED .....	12-13
STATEMENT OF THE CASE .....	13-17
I.    Deprivation the color of the law	
II.   Civil Right Act	
III.  Federal questions	
IV.  Discrimination	
REASON FOR GRANTING THE WRIT .....	17-18
CONCLUSION .....	18-20

## INDEX OF APPENDICES

### APPENDIX A

Opinion unpublished from U.S. Court of Appeals for the Fourth Circuit dated January 24, 2019

### APPENDIX B

Order from U.S. Court of Appeals for the Fourth Circuit dated February 26, 2019

### APPENDIX C

Mandate from U.S. Court of Appeal for the Fourth Circuit dated February 20, 2019

### APPENDIX D

Order from U.S. District Court Western District of North Carolina Charlotte Division dated  
March 21, 2018

APPENDIX E

Judgment from U.S. District Court Western District of North Charlotte Division dated March 21,  
2018

APPENDIX F

Order from U.S. District Court Western District of North Carolina Charlotte Division dated April  
27, 2018

APPENDIX G

Order from U.S. District Court Western District of North Carolina Charlotte Division dated May  
1, 2018

APPENDIX H

Order from U.S. District Court Western District of North Carolina Charlotte Division dated June  
18, 2018

**TABLE OF AUTHORITIES CITED**

**CASES**

“Albright v. Oliver, 510 U.S. 266, 247-75,  
114 S. Ct. 807, 813-14, 127 L.Ed.2d 114, 124 (1994)”

“Bivens v. Six Unknown Named Agents, 400 U.S. 388 (1971)”

Collins v. Hardyman, 341 U.S. 651, 656 (1951)

“E.g. Felder v. Casey, 487 U.S. 131, 139, 108 S.Ct. 2302, 2307,  
101 L. Ed 2d 123, 138 (1988)”

“E.g., Parratt v. Taylor, 451 U.S. 527, 536, 101 S.Ct. 1908, 1913,

68 L.Ed.2d 420, 429, (1981)”

“Erickson v. Pardue, 551 U.S. 89, 94 (2007) (per curiam) (citation omitted)”

Felder v. Casey, 487 U.S. 131, 139, 108 S.Ct. 2302,  
2307, 101 L.Ed.2d 123, 138 (1988)

Howlett v. Rose, 496 U.S. 356, 358, 110 S.Ct. 2430,  
2433, 110 L.Ed.2d 332, 342 (1990).

“James J. Park, The Constitutional Tort Action an individual Remedy, 38 Harv. C.R.-C.L. L.  
Rev. 393, 395-96 (2003)”

McFarlin v. Conesco Servs., LLC, 381 F.3d 1251, 1253 (11th Cir. 2004).

” Mohawk Indus., Inc. v. Carpenter, 558 U.S. 100, 106, 130 S. Ct. 599, 605 (2009).

“Monroe v. Pape, [365 U.S. 167, 81 S.Ct. 473, 5 L.Ed.2d 492 (1961)]

“Neitzke v. Williams, 409 U.S. 319, 325 (1989)”

“Nagy, 376 F. 3d at 256-57 (some internal quotations marks omitted)”

“Pennhurst State Sch. & Hosp. v. Halderman, 465 U.S. 49 (1984)”

“Paul v. Davis, 424 U.S. 693, 697-701, 96 S. Ct. 1155, 1159-60, 47L.Ed.2D 405, 411-14 (1976)”

See Great Am. Fed. Say. & Loan Ass'n v. Novotny, 442 U.S. 366 (1979

See, e.g. Micheal K. Cantwell, Constitutional Torts and Due Process Clause, 4 Temp. Pol. & civ.  
Rts L.Rev, 317, 320 (1995)

See, e.g., Murphy v. Mount Carmel High School, 543 F.2d 1189, 1194 (7th Cir. 1976)

Tidewater Oil Co., 409 U.S. at 151

White v. White, 886 F. 2d 721, 722-23 (4<sup>th</sup> Cir. 1989)

Wylie v Denton, 323 Ga App 161, 162 -163 (746 SE2d 689) (2013)

## **OTHER**

**Constitutional and statutory law, Bill of Rights, U.S. Supreme Rules, and law**

**Title VII of the Civil Rights Act, the Civil Rights Act of 1866, 42 U.S.C. § 1981,  
constitutional claims under 42 U.S.C. § 1983**

**First Amendment**

**Seventh Amendment**

**Ninth Amendment**

**Fourteenth Amendment**

**18 U.S.C. § 241**

**18 U.S.C. § 242**

**28 U.S.C. § 1915**

**28 U.S.C. § 1254**

**28 U.S.C. § 1257**

**28 U.S.C. § 1331**

**28 U.S.C. § 1343**

**28 U.S.C § 1442**

**28 U.S.C. § 1443**

**42 U.S.C. § 2000(d)**



**IN THE**  
**SUPREME COURT OF THE UNITED STATES**  
**PETITION FOR WRIT OF CERTIORARI**

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

**OPINIONS BELOW**

For cases from federal Court:

The opinion of the United States Court of Appeals appears at Appendix A to the petition and is  
☒ is unpublished

The opinion of the United States Court of Appeals appears at Appendix B to the petition and is  
☐ is unpublished; or

The opinion of the United States Court of Appeals appears at Appendix C to the petition and is  
☐ is reported; or,  
☐ has been designated for publication but is not yet reported; or,  
☒ is unpublished.

The opinion of the United States District Court appears at Appendix D to the petition and is  
☐ reported \_\_\_\_\_; or  
☐ has been designated for publication but is not yet reported; or  
☒ is unpublished

The opinion of the United States District Court appears at Appendix E to the petition and is  
☐ reported \_\_\_\_\_; or

☐ has been designated for publication but is not yet reported; or

☒ is unpublished

The opinion of the United States District Court appears at Appendix F to the petition and is

☐ reported \_\_\_\_\_; or

☐ has been designated for publication but is not yet reported; or

☒ is unpublished

The opinion of the United States District Court appears at Appendix G to the petition and is

☐ reported \_\_\_\_\_; or

☐ has been designated for publication but is not yet reported; or

☒ is unpublished

The opinion of the United States District Court appears at Appendix H to the petition and is

☐ reported \_\_\_\_\_; or

☐ has been designated for publication but is not yet reported; or

☐ unpublished

☒ For State cases from

The opinion of the Mecklenburg County Superior Court appears at Appendix I to the petition and is

☐ reported at \_\_\_\_\_; or

☐ has been designated for publication but is not yet reported; or

☒ is unpublished

## JURISDICTION

☒ for cases from federal courts:

The date on which the United States Court of Appeals decided my case was January 24, 2019.

☐ No petition for rehearing timely filed in my case.

☒ A timely petition for rehearing denied by the United States Court of Appeals on the following date: February 24, 2019 and a copy of the order denying rehearing appears at Appendix C.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including (date)

\_\_\_\_\_ on (date) \_\_\_\_\_ in Application \_\_\_\_\_ No. A \_\_\_\_\_;

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☒ for cases from state courts:

The date on which the highest state court decided my case was March 21, 2018

A copy of that decision appears at Appendix D.

☒ A timely petition for rehearing hereinafter denied on the following date: April 27, 2018 and a copy of the order denying rehearing appears at Appendix E.

The jurisdiction of this court is invoked under 28 U.S.C. § 1257(a).

## **CONSTITUTIONAL & STATUTORY PROVISION INVOLVED**

Petitioner alleges the actions, conduct, and the orders by the lower tribunal of the U.S. Court of the Appeal of the 4<sup>th</sup> Circuit, the U.S. District Court of the Western Division of Charlotte, and Mecklenburg County Superior Civil Court were unconstitutional through deprivation of color of law, civil right, and due process violations. The schedule all white male judges, the hearings, pleadings shows discriminatory and prejudicial during two civil judicial proceeding in the State of North Carolina. Petitioner an Afro-American women, with a Hispanic last name, and represent herself through both civil judicial proceeding due no counsel willing to take on the case, or willing to handle this complex case, due to the involve parties, and the State of North Carolina as Defendant. They claim there is conflict of interest, or they do not want to be involve due to they still have to work in this State, and county and with theses Judges. All of the courts, state agencies fail to provide protection, their actions or conduct were knowingly, and intentional prejudicial prosecution, and abuse their power, position, and authority due to the Petitioner is not an attorney, which is unlawful and unjust. According to 18 U.S. C. § 242, 28 U.S. C. § 1343, and 42 U.S. C. § 1983,

The interlocutory, sua sponte orders and no final judgments shows as a practice or policy for the sole purpose of protecting the State of North and evasion of compliance with the Federal Law. The State of North Carolina, local state courts, local agencies, and local federal agencies acts, conduct were unconstitutional, discriminatory, and demeaning during the two judicial proceedings. The actions, conduct of the Judges, clerk of court, and court administration were abusive, defamatory, and prejudice, and intimidating, and emotional abusive for a Judicial Court in the United States of America in 2019, be allow to use their position, power, and authority, and the law to intentional, vindictively, and knowingly control this case. The State of North Carolina wants control of this case, to either settle, without any public notice, and by allowing the parties involve continue to enjoy their life, liberty, and property without any consequences for their actions, or conduct of breaking the civil, criminal or rules, or procedures of the Federal Laws of the United States of America.

Petitioner alleged in the district complaint that the lower state court actions, conduct and interference unconstitutional and unlawful through abusing the court, and using their power, position, and authority for their own personal gain; by allowing Defendant Daniel J. Zamora and his counsel Chad T. Diamond to file false allegation civil complaints against the Petitioner without merit. All of the Judges Caucasian males, except for one throughout the whole bench trial, or hearings that were schedule differently for the Petitioner, than the Defendant Daniel J. Zamora, and his counsel Chad T. Diamond due to their profession as attorneys, even as of today. All of the Petitioner's timely pleadings, objections, and motions denied, the State Court refusing to show good faith toward "Pro Se", and refusing to disclose or allow the pro se to take part in the investigation process, or even communicate in good faith. North Carolina State agencies, courts actions, conduct unconstitutional and unlawful by using their discretion interference to violate the Petitioner's civil rights, there is no immunity. The acts, misconduct of abusing the court for their own personal gain, or interest, or by refusing to review the preponderance of evidence, and by allowing employees of the State of North Carolina Judiciary to violate the code of standard of professionalism, ethics, and the cannon laws; the administrative laws of the Federal Constitution of the United States of America.

### **STATEMENT OF THE CASE**

Petitioner alleged in the District and federal court, and federal agency complaint that the local State agencies conduct, actions were unconstitutional and unlawful due to all of the order, opinions, and decision were sua sponte interlocutory decision, no final judgments for over three years. The District Court opinion prejudice, bias, and vindictive and unconstitutional due to the sanction order against the Petitioner for over a year, without merit. This order unconstitutional through depriving the Petitioner the opportunity to proceed 'pro se', which is a violation of the constitutional. Every citizen has a right to defend themselves in a court of law, since this case is civil, and the Petitioner is a victim, there is no reason for the victim to be abuse by any court, but much less a Federal court, where the State interference violates the victim's civil rights. The federal courts created to enforce the laws, rules, and procedures and

provide equal protection for all citizens of the United States of America. Communicating with all counsel on record of the case, means “pro se”, the Court has a duty to provide justice, relief, and enforce the laws, and brings criminal charges against an individuals who breaks the laws, even in civil cases.

According to 28 U.S.C. § 1331, the Petitioner has a right to file an appeal with the federal court in the Division that has the authority to hold the individuals accountable for violating the laws of the State of North Carolina. According to 42 U.S.C. § 1871, it should not matter who the individuals are, or their position or their financial status to seek justice, relief without the retaliation of the State causing more severe separable injuries to the victim. According to 18 U.S.C. § 241, 242, there is conspiracy, deprivation of color of the law, in this civil case but the actions, conduct of the local courts, agencies are criminal tort acts, and the district court failure to act, shows prejudice, bias, and conflict of interest by not addressing the Federal Questions presented in the complaint. By the petitioner, not license to practice law, as an attorney does not provide an opportunity for any court, agency or state to use their discretion or authority to discrimination, allow special treatment, or dismiss allegations without allowing the discovery process, or place an injunction against the petitioner without merit. The clerk of court have a duty to report, or stop the discrimination; but instead they feel they are protect through the sovereign immunity act, but that is not the case, when their actions or conduct violates the individual’s civil rights. Which in this case all of the court, State, and local agencies and Federal agencies fail the victim, and the petitioner who is an innocent citizen of the United States of America, and this court has the authority to hold the State of North Carolina, their local, federal agencies to abide by the Constitutional law.

Due to the lower Court opinion to dismiss the complaint without addressing the federal question or timely motion for rehearing or rehearing en banc gives the local district court jurisdiction and authority to handle this case, the way they choose, which is not the law. The State of North Carolina, federal and state agencies, and the county awareness of this case since 2016; the Petitioner sent a copy of the complaint to all of the agencies, news media, and local state politician, once the complaint filed with the clerk of court in Mecklenburg County Superior Civil Division. The State of North Carolina, the judges,

and the administration, and department of justice agencies fail to act, investigate for over two years. The fail to disclose, or show good faith, or abiding by the “pro se act” or allow the victim access to all of the defendant’s misconduct investigation, hearings. The administration decision or hearing against all official defendant in their official capacity did not include the victim or the victim statement or address the concerns of the misconduct of their employees of the State of North Carolina. When the State discretion interference violates the petitioner civil right, they are immune, and needs to be held accountable according to the laws of the court.

A federal question arises because a State Court, County or agencies are prejudice against the Petitioner, and will not allow the Petitioner’s constitutional, federal law, or fair due process rights to be exercise during two judicial civil proceedings in the State of North Carolina.

The Petitioner file a civil complaint against Defendant Daniel J. Zamora, who is a license attorney, and his business for a legal malpractice lawsuit. The complaint alleges breach of contract, breach of fiduciary duties, and negligence, and breach of investment payments, and breach of exploratory investment contract. Constructive fraud, unfair and deceptive acts, or practices acts that involves North Carolina State Representative Robert Pittenger, Jr., and a real estate tycoon David Hoffman of the Hoffman Group Realtor of the State of North Carolina. The State Court, the State agencies refuse to take complaint as construe, due to the Petitioner file an application to proceed forma pauperis, if the Petitioner had the financial status or hire an attorney license under the State of North Carolina, this case results would be differently. If the Petitioner did these allegations in a complaint, the Court would of charge the Petitioner with criminal charges. The lower tribunal and state agencies opinions are unconstitutional and unlawful through to violation of civil right act, due process act, and amendments of the Bill of Right of the United State Federal Law.

The State of North Carolina and the Department of Justice has a duty to protect, treat, and respect all citizens who resides in the State of North Carolina according to the State and Federal laws of the United States of America. The Constitution and the Bill of Rights are federal laws, which are laws that all

individuals have to abide by civil and criminal law, and no individual is above the law. All of the lower Court orders shows prejudice, biasness, and given special treatment to the State of North Carolina, who has no authority, or control over the higher Court, in a different State. However, the unpublished opinion shows the State of North Carolina still have control over how the case concludes. The discrimination by a Court, Judges, and Clerk of Court of the State of North Carolina, should not be disregard, dismissed or settled out of court. No others citizen should experience or be abuse by the State of North Carolina, and should be made to feels as though a Caucasian male, with money in a certain profession can move local Court, Judges, and there is no reason to file any complaint against them, because the State of North Carolina is going to protect them.

Petitioner is an adult citizen of the State of North Carolina, State certified license Notary, and certified State Guardian ad Litem, who is a mother of six children who want to invest in property to leave a legacy for her children. Petitioner hired an attorney Daniel J. Zamora to handle two legal litigation cases, after one case receive relief, he use his power, position, and authority and knowledge, and influences to have the Petitioner to believe that her money would be invested in two real estate properties, the first investment with David Hoffman, and the second investment with Pittenger's land investments. The State of North Carolina denied the victim access to any investigation of misconduct, or investigation, or any response from the defendants, or their counsel. This case has been outstanding for a total of three years, without any notice to the public, or any of the defendant held accountable for their actions or conduct.

State of North Carolina, Department of Justice fail to act, to prosecute, or prevent Daniel J Zamora from causing injury to any other citizen in the State of North Carolina; they have not suspense, or revoke his license to practice law for three years. Daniel J Zamora continues to provide legal services to the public, he still organizing, creating or become members of new business in different names. North Carolina State Rep. Robert Pittenger Jr., transfer the Piittenger land investment assets to another business entity, and moving to a different city of North Carolina, and David Hoffman continues to build new



business, and continue to enjoy their life, liberty, and property but the victim has to suffer more abuse by the Courts, and the State of North Carolina. Chad T. Diamond continues to practice law, without any consequences due to his action, conduct of discrimination, abuse of court, and his deceptive actions during the two judicial proceedings, and the perjury.

We agree that North Carolina's tolling rule applies in these cases. It is not inconsistent with federal law. It also has the advantage of promoting judicial economy in that it encourages petitioners to wait for the appellate proceedings in the underlying case fully run their course before initiating a denial-of-access-to-the-courts lawsuit. As the law states, the reversal of the adverse judgment would moot such a claim. A complaint should not be dismissed for failure to state a claim which relief can be granted unless it appears upon a reasonable doubt that the Petitioner is proven after discovery or by a jury trial, not a bench trial or for personal or official gain, or conflict of interest.

Petitioners can and have stated a clear claim in pleadings with integrated evidence proving a dynamic set of facts; the district court seems to not accept the evidence from petitioners but only further advances fraudulent defenses from defendants, and this in a court acting under rules inconsistent with acts of congress. The evasive and mean spirited actions of the defendant created a need for petitioners to generate of unnecessary pleadings in opposition when frivolous, inadequate, false or fraudulent defenses are accepted from defendants by the district court who then terms the petitioners pleading as "confusing" because of their quantity. In considering the motion, the court may not consider any material "beyond the pleadings." *Hal Roach Studios, Inc. v. Richard Feiner and Co. Inc.*, 896 F.2d 1542, 1555 n.19 (9th Cir. 1990). However, material, which is properly submitted as part of the complaint, may be considered. *Id.* Exhibits submitted with the complaint may also be considered. *Durning v. The First Boston Corp.*, 815 F.2d 1265, 1267 (9th Cir. 1987). Properly submitted material, much of it court documents, having requisite for Judicial notice, has been submitted by petitioners seeking protection and upholding of constitutional rights and laws protecting the all victims, as well as the public generally. When petitioner filing for injunctive relief against all of the Defendants, the local State Court, state agencies dismiss the

complaint immediately, without considering the federal laws or the violation of due process, as it used rules not consistent with acts of congress that at one time, prior to abrogation, provided equal protection of law and constitutional justice.

### **REASONS FOR GRANTING THE PETITION**

The State of North Carolina, state agencies, and their employee's actions and conduct were unconstitutional and unlawful, and when their discretion interference violates the Petitioner's, civil rights they will be held accountable by this Court. Sovereign immunity does not apply when any individual violates another individuals right to receive a fair, equal protection, and due process, and a jury trial when demand in a civil or criminal case.

All 50 states of the United States has a duty, authority, to abide by the federal and state laws, abide by the constitution and all of the amendments of the Bill of Rights. No citizens should not be abuse, discriminate, intimidate, or falsely prosecute by any Judge, Court, or employees of judicial system. The employees of the Court cannot offer any legal advice, but they should not be able to use their power, position or authority, or knowledge to control civil cases. No local State Court should have that much power, out of their jurisdiction, control the outcome of this case; especially after their action or conduct were unconstitutional and unlawful, and the Judge issue an injunction against the Petitioner for requesting relief and justice within the five years statute of limitation.

This petition should be granted due the Petitioner's rights have been violate for over three years, seeking justice, and relief from all the State Courts, Federal agencies in the State of North Carolina; every response back from the agency are males. The Courts and State agencies of North Carolina action and conduct violates 42 U.S. C. § 1871; 42 U.S.C. §1983, and 28 U.S. C. § 1331; 18 U.S. C. § 241, 245; and the Petitioner's first, seventh, and fourteenth amendment of the Constitution.

No victim, citizen should endure the discriminatory, abusive, and demeaning, and defamatory, intimidating treatment from their own State Court, Judges, or federal agencies; every State has a duty to

abide by federal laws, as well; when they fail to, this court will hold them accountable. No individual is above the law, the Constitution created for all citizens, not just the citizens who have a license to practice law. Whomever needs financial assistance should not be treated any differently from a paid victim unlike in this case, the Judges would not handle this case the same way if the Petitioner would of pay the State fees, the petitioner would have receive justice, and relief. It should not take over 3 years because the State is more concern about their own interest instead of public interest or safety by refusing to allow the media to investigate this case, or hear about the abuse again by the Court, Judges, and employees of the State.

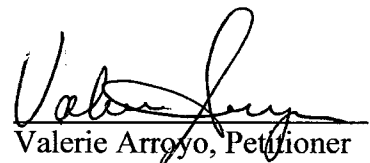
### **CONCLUSION**

The petition should be granted due to this court has the authority, it is the law, and no individual, State, or Agency, or position, money or notoriety is no above the law. There are rules, procedures, and rights, and laws that all individuals has a duty to abide by. When those individual fail to abide by laws, procedures, or rules of the U.S. Constitution, and the State action, conduct or interference violates an individual rights, they are not above the law either, should be held accountable.

The actions, conduct of the State Courts, their employees, and the State Agency fail to abide by their own mission statement, uphold the law, and provide integrity, respect, and show good faith, and fail to protect, show fair equal treatment, and allow a false allegation complaint to move forward knowingly, vindictively, and maliciously without any consequences. Due to this, civil compliant involves a former North Carolina State Representative Robert Pittenger, Jr, a well-known real estate David Hoffman, and Daniel J. Zamora, attorney at law under the State of North Carolina investments, and breach of contracts, and Chad T. Diamond, another attorney at law under the State of North Carolina who abuse his power, position, and authority. Due the State of North Carolina, interference to allow this civil case to move forward violate the Petitioner's rights during two judicial proceedings. The local administrative of

judicial, the NC State Bar, and the Commissioner of the State of NC, and the Department of Justice, and local politicians fail to protect, provide, or treat the Petitioner respectfully, with integrity, or good faith, or abide by the code of ethics, or standard code of professionalism. The State of North Carolina interfere with the notifying the public, all of these individuals who perform legal services to the citizens in the State of North Carolina, and the State fail to abide by the First Amendments of the Bill of Rights, the Constitution. This case has been in the State of North Carolina Civil Courts since March 2015, without any resolution, all of the defendants are able to move forward with their life without any consequences of abusing the petitioner or her family.

Respectfully submitted on 27<sup>th</sup> day of March 2019



Valerie Arroyo, Petitioner  
617 Springfield Drive, NW  
Concord, NC 28027  
Telephone# 704-506-1526