

No. 19-395

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In the  
Supreme Court of the United States

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CHRISTINA ALESSIO,

*Petitioner,*

v.

UNITED AIRLINES, INC.,

*Respondent.*

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On a Petition for Writ of Certiorari to the  
United States Court of Appeals for the Sixth Circuit

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REPLY BRIEF OF PETITIONER

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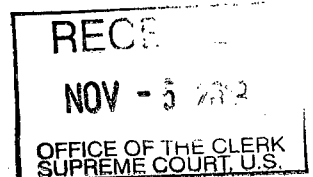
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**REPLY BRIEF ON  
PETITION FOR WRIT OF CERTIORARI**

With respect, and per Rule 15.6, *Petitioner* may file a **Reply Brief** to call attention to new points declared in the *Respondent's Brief in Opposition*.

Respectfully, *Respondent's Brief in Opposition* was filed on October 24, 2019, with **THE SUPREME COURT**, in response to the *Petitioner's* request to grant a **Writ of Certiorari**.

With respect, *Petitioner's Reply Brief* filed on November 1, 2019, is addressing new points declared in the *Respondent's Brief in Opposition*, for insight, clarity and understanding for a sincere, mindful judicial review for granting the *Petitioner* a **Writ of Certiorari**.

The contents of *Petitioner's Reply Brief* calls attention to *Respondent's Brief in Opposition's* new points, and is summarized by the "Facts of this Case" that are 3 fold:

Respectfully,

1. To communicate a mindful focus on the ultimate responsibility under **THE UNITED STATES CONSTITUTION: To Protect the People**.

2. Exposure of "**Chemical Substance Products**" in the Aircraft Cabin is approved by the *Respondent*, and needs answered as to whether or not this routine practice is in compliance with the statutes.

**Federal Question:** Is the *Respondent* in compliance with the statutes?

**3. Oversight and Legislation by the 116th Congress:** New Legislation needed with a fair, right and just intention, "**To Protect the People**" with a knowing and willful transparent Official Congressional "**Certificate of Compliance**", to the Cleaning and Air-Freshening Products exposed, inside the Aircraft Cabin.

**NEW POINTS:**

**"ARGUMENT / REASONS TO DENY PETITION",**  
by the *Respondent*:

I. "The Petition should be denied because there are no "compelling reasons" for granting certiorari in this case." (reference: page #6, of the Brief in Opposition)

Respectful *Petitioner's* Reply Brief requesting attention:

**Respectful Compelling Reason #1**

YOUR HONOR and with great respect, to be clear and for the record it has been communicated to the best of the *Petitioner's* ability and understanding, that the *Respondent* knowingly and willfully approves the use and exposure of "**Chemical Substance Products**" in the Aircraft Cabin.

**Respectful Compelling Reason #2**

YOUR HONOR and with great respect, the *Petitioner's* Job Responsibility, Duty and Obligation is to ensure a Safe Environment in the Aircraft Cabin and to communicate any safety concerns up the Leadership chain until resolved.

**Respectful Compelling Reason #3**

YOUR HONOR and with great respect, *Petitioner* has reached out for a Third party opinion: The Equal

Employment Opportunity Commission (EEOC), who provided a **NOTICE OF RIGHTS** letter dated April 18, 2017 (*Petitioner's App.*, 94a-95a), communicating an inability to certify that the *Respondent* is in compliance with the statutes. Respectfully, is the *Respondent* in compliance with the statutes knowingly and willfully using and exposing "**Chemical Substance Products**" in the Aircraft Cabin?

**Respectful Compelling Reason #4**

**YOUR HONOR** and with great respect, how is routine use and exposure of "**Chemical Air-Fresheners**" in the Aircraft Cabin for "All onboard to Inhale", with protective measures and ability to follow the First Aid Procedures "not an option", in compliance with United States Federal Law?

Respectfully, with this type of routine use and exposure of "**Chemical Substance Products**" chosen for inside the Aircraft Cabin, is this a blatant physical assault on **All Air-Traveler's Human Health**?

**Respectful Compelling Reason #5**

**YOUR HONOR** and with great respect, how is routine use and exposure of "**Chemical Air-Fresheners**" in the Aircraft Cabin with Trade Secret Ingredients (Chemical Ingredients purposely withheld), in compliance with United States Federal Law?

Respectfully, with this type of routine use and exposure of "**Chemical Substance Products**" chosen for inside the Aircraft Cabin, is this a pure violation of **All Air-Traveler's Civil and Human Rights**?

### **Respectful Compelling Reason #6**

**YOUR HONOR** and with great respect, do you believe transparency is paramount for All Commercial Air-Traveler's Right's: "**Right to Know**" and "**Need to Know**", by providing Commercial Air Travelers with a list of the Aircraft Cabin Products, up to and including the Cleaning and Air-Freshening Products approved by the Government with a "**Certificate of Compliance**", disclosing all ingredients including the Chemical Fragrances, for the **Air-Traveler's Public Safety and Health**?

Respectfully, is this type of routine use and exposure of "**Chemical Substance Products**" chosen for inside the Aircraft Cabin, contributing and resulting in acute airsickness with unhealthy side effects, in addition to chronic illnesses and disease, up to and including cancer?

### **Respectful Compelling Reason #7**

**YOUR HONOR** and with great respect, do you believe "**Chemical Substance Products**", should be refrained from being used inside the Aircraft Cabin (example: No Smoking), to avoid chemical inhalation exposure, thereby upholding **THE UNITED STATES CONSTITUTION: To protect the People**?

### **Respectful Compelling Reason #8**

**YOUR HONOR** and with great respect,

Why, "**Chemical**" Air-Fresheners in the Aircraft Cabin?

Respectfully, with this type of routine use and exposure of "**Chemical Substance Products**" chosen for inside the Aircraft Cabin, should there be a Prevention

Plan implemented requiring possible Blood Tests, verifying the *Respondents* amount and levels of exposure to the “**Chemical Substance Products**”, that enter the Global Air-Traveler’s body through inhalation in the Aircraft Cabin, contributing to unhealthiness?

**Respectful Compelling Reason #9**

YOUR HONOR and with great respect, the “**Stricken Evidence**” is sincerely relevant “**Facts to this Case**”, applying the correct law. With respect, *Respondent* addresses the *Petitioner’s* Respectful Compelling Reason #9, “**Stricken Evidence**” as “supplements” for the record (reference: *Respondent’s Brief in Opposition*: page #3, paragraph #2). With respect, may the *Respondent* address the “**Facts of this Case**” as “**Stricken Evidence**” and not as “supplements”.

**Respectful Compelling Reason #10**

YOUR HONOR and with great respect, *Respondent’s Brief in Opposition* (reference: page #4, paragraph #2), please know that the *Petitioner* is simply requesting verification and certification that the Federal Rule of Law is being followed in the interest of the Public’s Safety and Health. With respect, New Legislation with a transparent “**Certificate of Compliance**” from the Legislative Branch of our great Government, making Public the Cleaning and Air-Freshening Products used inside the Aircraft Cabin, would be considered the least support in Honor of **THE UNITED STATES CONSTITUTION: To Protect The People.**

**Respectful Compelling Reason #11**

YOUR HONOR and with great respect, *Respondent’s Brief in Opposition*, “**SUMMARY OF THE**



**ARGUMENT**" (reference: page #5, paragraph #3), please know that the *Petitioner* believes there is a true conflict of law when the *Respondent* knowingly and willfully approves the use of "**Chemical Substance Products**" inside the Aircraft Cabin. Respectfully, the *Respondent* has been unable to provide a "**Certificate of Compliance**" from our **Legislative Branch, 116th Congress**. And when inviting Corporate Safety or Inflight Management specifically, to please come fly with me, *Petitioner* has also with great respect, been unsuccessful with the invitation and is unclear why. Respectfully, **Safety is Top Priority**.

**Respectful Compelling Reason #12**

**YOUR HONOR** and with great respect *Respondent's* Brief in Opposition (reference: page #9, paragraph #1), it states, "**Here, there is no indication that Congress intended to create a private cause of action under the HMTA, and Alessio's Petition fails to present evidence of congressional intent to the contrary.**"

*Petitioner's* response: Respectfully, if Congress did not intend to create a private cause of action under HMTA for the Global Air-Traveling Public, in coordination with no "**Certificate of Compliance**" to "**Chemical Substance Products**" used and exposed inside the Aircraft Cabin approved by the *Respondent* with ingredients not applicable, is our Legislative Branch respectfully and truly upholding their oath of office, to **THE UNITED STATES CONSTITUTION: To Protect The People?**

Respectfully requesting, non-toxic, chemical-free, 100% safe and 100% transparent, Aircraft Cabin Cleaning and Air Freshening Products for the Safety and Health of the Global Air Traveling Public.

With the greatest respect, may **THE SUPREME COURT**, in the interest of the Public's Air-Travel Safety and Health, grant the *Petitioner's Writ of Certiorari*.

***Petitioner's* RELEVANT STATUTES:**

**THE UNITED STATES CONSTITUTION: To Protect the People**. Federal Law 49 U.S.C. § 5124.

Respectfully, any further **STATUTE** or **CASE** referenced and communicated in the *Respondent's BRIEF IN OPPOSITION / TABLE OF AUTHORITIES* (reference: page #iv), *Petitioner* is requesting, may the Court rule the references be dismissed without prejudice, unless **2 Factors** apply giving merit to the reference for a fair, right, true and just comparison.

**Factor 1.** Federal Law. The Case must not be State or Local.

**Factor 2.** Location of Environment. Location is **INFLIGHT**.

Respectfully, *Petitioner* believes any true comparison would have to be a Case Location, not on the "Ground" rather in the "Air" traveling, hence the **Federal Law: To Protect the People**.



### CONCLUSION

With great respect, and for the foregoing reasons submitted in good conscience and good faith, may **THE SUPREME COURT**, find merit in granting the *Petitioner* a Writ of Certiorari.

Respectfully submitted,

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