

19-5019

No. _____

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

Supreme Court, U.S.
FILED

MAY 30 2019

OFFICE OF THE CLERK

Jennifer Perez

— PETITIONER

(Your Name)

vs.

Paul G. Dwyer

— RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Supreme Court of Florida

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Jennifer Perez

(Your Name)

Apt 1.

1040 SW 4th

(Address)

Avenue (please keep confidential)

Miami, FL 33130

(City, State, Zip Code)

(786) 458-2672

(Phone Number)

QUESTION PRESENTED

Are people with disabilities more likely to be protected or discriminated when regarding parental stigma by, the Guardian ad Litem, as well as the Father of our son we share where the sexual and physical abuse happened under "Daddy's" custody around 50 to 60 times however my disabilities were intentionally used to deflect on the truth of what happened in the father's home and the father, guardian and Judge did use that as an intentional discrimination and re-victimized a child who himself has been diagnosed and also classifies under the American Disability Act, how my 14th amendment by the state government on behalf of the Eleventh Circuit Judge and her prejudicial bias violated my due process as well, that the burden of proof is on the petitioner and the Judge went of strictly hearsay and did not allow me to show my clear convincing evidence to substantiate all the false allegations, are these federal acts that are punishable as actual crimes when reviewed properly has judicial abuse occurred in so many ways, if it is okay for the petitioner who is an attorney and the guardian ad litem to also invent medical mental conditions that I do not suffer from and although I had a doctor(s) note proving otherwise dated August 10, 2018 and the Emergency Hearing was August 31, 2018 did I meet any of those alleged diagnoses, although opposing counsel was reading my clear, convincing and supporting of my actual disabilities that I was on my regimen for and Judge Manno-Schurr stopped her and said that was enough, if based on generalizations about persons with disabilities, is it okay to violate my Constitutional and Civil Rights because of my disabilities as a mother and chose hearsay over the truth that supported my truth and evidence? That I was not allowed not allowed to introduce and was abruptly interrupted by the Judge, is it okay when a minor child comes forward to and admits that they have been sexually and physically abused including under the supervision of the other parent known as the father Mr. Paul G. Dwyer, Esq. in this case about 50 to 60 times? To create Parental Alienation that is known as child abuse when it under false pretense as in this instance, with a No Contact Order, to cover

up a sex abuse scandal of our minor son who when I had him assessed was diagnosed concluded had (309.81/F43.10) Posttraumatic Stress Disorder, (309.89/F43.8) Other specified trauma – and stressor - related disorder, (314.01/F90.2) Attention – deficit/hyperactivity disorder, combined presentation, (313.81/F91.3) Oppositional Defiant Disorder. Which the father, and the guardian pretended not to know about although I had an IEP and a 504 form portion from the assistant Vice Principal filled out and we were scheduled to go to the doctor to have the portion properly filled out by the physician in early September however the guardian could not make it and the father and I were supposed to go together, instead in the emergency hearing they pretended I made these illnesses up and they knew nothing of this therapist and “all these other specialist” they made up although we were all copied in this email. Did the Eleventh Circuit Court reach opposite conclusions on the las vs. another? If the abuse of the Judicial Power is a direct violation of our Constitution, my constitutional rights, Civil Rights Law and treated inhumanely?

TABLE OF CONTENTS

	PG.
QUESTION PRESENTED.....	2,3
TABLE OF CONTENTS	4
TABLE OF AUTHORITIES	5
STATUTES AND RULES.....	6
CONSTITUTIONAL PROVISIONS.....	7,8
STATEMENT OF THE CASE.....	9
REASONS FOR GRANTING THE WRIT.....	10-21
PETITION ON FOR A WRIT OF CERTIORARI.....	22
APPENDIX.....	23-33
CONCLUSION.....	34

TABLE OF AUTHORITIES CITED

CASE NUMBER

PAGE NUMBER

Domestic Violence Division – 2018 – 013787 o/b/o

Judge Diana Vizcaino (originally signed by Judge Davis)

Family Division – 2018-18800-FC-04

Judge V. Manno-Schurr

Third District Court of Appeals – 3D18-1931

EMAS, C.J., SCALES, HENDON, JJ.,

Supreme Court of Florida – SC19-495

CANDADY, C.J., and POLSTON, LABARGA,

LAWSON, and LAGOA, J.J.,

STATUTES AND RULES

State Government Amendment 14 – due process included

Civil Rights Law (1)

Section 504 of the Rehabilitation Act of 1973 (Section 504) (2)

Title II of the American with Disabilities Act of 1990 (ADA) (3) (4)

28 C.F.R. (section) 35.139

Title IX Sexual Assault

Other

CONSTITUTIONAL PROVISIONS

The term “parents” includes biological, foster, and adoptive parents. It also includes caretakers such as legal guardian’s correlatives. Prospective parents include individuals who are seeking to become foster or adoptive parents.

1. 29 U.S.C. statute 794. Section 504 of the Rehabilitation Act of 1973 as amended, (29 U.S.C. 794 – PDF prohibits discrimination against otherwise qualified individuals on the basis of disability.
2. 42 U.S.C. statute 12131-12134 regarding the prohibition against discrimination and other generally applicable provision.
3. 42 U.S.C. statute 12132 the operative statutory text is at statute subject to the provisions of this title no qualified individual with disability shall be reason of such disability be excluded from participation in or be denied the benefits off the services, programs or be denied the benefits of the services, programs or activities of a public entity, or be subjected to discrimination by any such entity.

(Children with disabilities also have nondiscrimination protections under 504 and Title of the ADA but the focus of this technical assistance is on parents and prospective parents with disabilities.

4. Amendment XIV (section 1) All persons born or naturalized in the United States and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the

privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

5. 28 C.F.R. (Section 35.139)

Contained Within

Title 28 - Judicial Administration

Part 35 -Nondiscrimination on the basis of disability

in state and local government services

Section 35.139 – Direct Threat

6. Title IX is a federal Civil rights law that prohibits discrimination

on the basis of sex in any educational program or activity that receives

Federal funding. This includes most, schools, including private institutions and

Grades K-12. Title IX addresses sexual harassment, sexual violence, or any gender

-based discrimination that may deny a person access to educational benefits and opportunities.

STATEMENT(S) OF THE CASE

- I. AN EMERGENCY MOTION TO SUSPEND MOTHER'S TIMESHARE ON ALL HEARSAY FALSE ALLEGATIONS FROM PETITIONER PAUL G. DWYER FATHER WITH NO BURDEN OF PROOF VS. CLEAR AND CONVINCING EVIDENCE FROM MOTHER JENNIFER PEREZ

- II. THE DISTRICT COURT'S PREJUDICIAL INTENTIONAL BIAS RULING GRANTING FULL "temporary" sole custody, no contact or any kind with my son from my behalf, Judge Manno-Schurr would barely allow to even to cross-examine the witness, violated the state government my amendment right number 14 and due process, would not allow me to introduce any substantial evidence at all and kept treating me indignant, inhumane, cruel, along due to my disabilities (transcript(s) upon request) shows it all, VIOLATED THE CONSTIUTION, AND MY CIVIL RIGHTS AS WELL AS THOSE OF MY SON.

REASONS FOR GRANTING THE WRIT

The court should Grant Certiorari to Clarify the Proper Scope that the American disability act is a civil rights law that prohibits intentional discrimination, for the sole purpose at that to hide the underlying reason of our minor child who was sexually and physically abused for 2 years 9 and $\frac{3}{4}$ months under the care of the father's supervision as well as the school's by another minor however to eliminate the only person protecting our son the minor was I his mother, the child who suffered sexual abuse was assessed with four disabilities and required an IEP and an 504, and were thrown out in the beginning of the school year during this emergency hearing due to the false allegations , and made up illnesses that prohibits (intentional in my case) discrimination on parents like myself to remove our child from me because of my disabilities and based on the stereotypical belief Paul G. Dwyer, Esq. and Evin Daly, Guardian ad Litem made up mental conditions that I do not suffer from and including I was completely off my medications including contradicting reports from Mr. Daly in each of the cases the Domestic Violence Division where my son testified and he was assigned by Judge Vizcano (Excellent Judge) and my son stated how he was scared of his dad and of Judges and Judge Vizcaino helped him out a lot including made him feel comfortable enough to speak June 26, 2018. In the status report of that case in the courtroom of Judge Vizcaino for the Domestic Violence Division, Mr. Evin Daly makes me look and seem as the stellar mom until he meets Mr. Paul's G. Dwyer, Esq. money in the Family Court Division and is bought out. (Upon request evidence will be provided). How discrimination of my child and I are resulting in long-term negative consequences. That these undermining precious moments for my son and I will never be replaced for example Graduation from 5th Grade, his Washington trip that he and I were so excited about and spoke off and I never had the chance to even see a picture and let alone ask or attend. How hearsay does not mean it is

true, how if one is accused of a crime, in a criminal matter you are innocent until proven guilty, how you are awarded a public defender if you cannot afford a private attorney and if desired, how even defendants have time to prepare for Court including the right for a fair and speedy trial and at arraignment are told what they are being charged with, meanwhile and still these defendants have a chance to speak if they chose to not like what Paul G. Dwyer, Esq. did as Judge Manno-Schurr, while our son and his friend were in a playdate activity with me, he called to ask if I wanted food delivered after we had spent the whole day with our son at Family and friends day from our son's elementary school, I said no thank you we are actually making our own pizza and cookies, about 5 mins served me with the regular motion August 25, 2018. Then to have me re-served because I had not answered which I had 20 calendar days to do the summons this time marked as an Emergency Motion while my son and I were doing homework on Tuesday August 28, 2018 and asked if it was his fault because of his sexual abuse coming forward that Daddy Paul Grant was trying to take him away from me, because he understood clearly forward that Daddy was trying to take him away from me, because he understood clearly what the process server stated of why would a father want to take and separate us, when I closed the door I told our son not to worry that all was okay and it was important we finish our homework. I never once blamed his father and reassured our son that his coming forward about his sexual abuse had nothing to do with Daddy and Mummi, that morning August 29, 2018 I never thought that would be the end of my parental rights, that Wednesday as I dropped him off with as I was recommended not to drive. I then proceeded to receive a Notice of Hearing that Wednesday August 29, 2018 and to my disbelief we had an Emergency hearing originally set for that Thursday August 30, 2018 at 1:30 pm which then was changed to Friday August 31, 2018 at

9:30 a.m. On Thursday August 30, 2018 I went to legal aid and two different attorneys explained to me that no attorney would retain the case on a one day notice let alone on an Emergency basis, how my due process both substantial and procedural were terminated, completely, dismissed, the Constitution, the Civil Rights and the ADA are there to protect people like my son and I all I did was defend, love and care for my son who also is covered under the American Disability Act and made to look like a “ill loving” mother as Mr. Paul G. Dwyer described me in the nicest way possible, as he told our son to sweep the sexual abuse under the rug and move on, how he wanted nothing to do with me because I “aggravated” his life due to my protecting our son and to get over it and who would ever listen to me that he would make my disabilities come to light and constantly made that threat, as soon as Mr. Dwyer found out from Mr. Daly as he intervened on his own by a “Motion for Clarification” by Opposing Counsel although they knew Mr. Dwyer was not on the case it was only me who filed as the mother on behalf of an o/b/o to keep it confidential because of the age of the children. Mr. Dwyer then started to pretend to care and from August 7, 2018 – August 23, 2018 filed all paperwork needed without hesitation and still managed to act normal with our son and myself sadly because of our history and needing any court litigation and or family court I never thought Mr. Dwyer would be able of betraying his own son, the primary victim who went through so much and then was re-victimized at the Minor’s expense to keep the sex scandal quite and separate our mummi and son bond. That morning of August 31, 2018 at 7:14 am my son video called me and called me and asked if he would ever see me again and I told him I honestly did not know and he said I know mummi it is daddy and you are not the one separating us, I sweetheart listen pray to God no matter what, your voice is your power and no matter the decision of today know that I you Nono with all my heart, and he said mummi I love you too, and I said now go play with your friend,

remember to always listen to your Guardian Mr. Daly (at that point I did not know him and Mr. Dwyer had a plot against Grant Michael and I) and I am proud of you for being truthful. We hung up and that was it never again have I heard his little voice, nor seen my child's face at what expense for the following acts committed from the legal representatives who had no consideration and lied under oath: Fraud, Deceit, Obstruction of Justice, Morale Turpitude, violation of the ADA on 2 levels for my son and myself, creating Parental and Child Alienation based on perjury, abusing of judicial power, committing the federal fraudulent acts against the Constitution by violating the state government amendment number 14, and Civil Rights Law of parents and prospective parents (1) with disabilities. Section 504 of the Rehabilitation Act of 1973 (Section 504) (2) and Title II of the Americans with Disabilities Act of 1990 (ADA) (3) protect parents and prospective parents with disabilities from unlawful discrimination in the administration of child welfare programs, activities, and services. (4) For example, ensuring that parents and prospective parents with disabilities have equal access to parenting opportunities increases the opportunities for children to be placed in safe and caring homes which my son had with me until Mr. Dwyer, Mr. Daly, and Judge Manno-Schurr lied so much under oath and her intentional prejudicial ruling that we were separated. Tomorrow May 31, 2019 being 9 months exactly from August 31, 2018 when my son was taken from me due to Judge Manno-Schurr's Order how is one to cope, mediation is not the solution it is a band aid like on a shot wound, how my heart was ripped out that Friday morning, and I cannot even imagine GM, however on that the only words I clearly remember his dad told him about Dr. Sczechowicz was "my daddy said court put in a thing and I could not see my Mummi, until she got better and came here" to see the doctor, yet Mr. Dwyer paid the psychologist, and it was heartbreaking to see my son being brainwashed by lies as he knew the truth of what happened that was in November, 2018

we are now in the end of May, 2019, without any contact, one may ask why have I not agreed with “offers and or chances” they have “given me and that is” because it all under false pretense and fraudulent accusations that Mr. Dwyer and Mr. Daly until this day are unable to substantiate any evidence except hearsay, false allegations I have asked them since the day my child was taken away to please prove me wrong and they still have not been able to, with no evidence and the burden of proof lays on the petitioner, I as the respondent have done my due diligence and have gone above and beyond to show the exact opposite of every lie they have accused me. In determining whether an individual poses a direct threat to the health or safety of a child or others, child welfare agencies and courts must make an individualized assessment, based on reasonable judgment that relies on current medical knowledge or on the best available objective evidence to ascertain the nature, duration, and severity of the risk to the child; the probability that the potential injury to the child will actually occur; and whether reasonable modifications of policies, practices, or procedures will mitigate the risk. (5) 28 C.F.R. section 35.139 At the time of the hearing Judge Manno-Schurr violated the Civil Federal Rule mentioned above she heard opposing counsel reading my updated doctor(s) note dated August 10, 2018 and our emergency hearing was august 31, 2018 which means I did not know this was coming I was up to date on my medication and she read the actual diagnosis that I had and was on regimen, not the lies invented by Mr. Dwyer and Mr. Daly, also saying I was off my medication, followed by Judge Manno-Schurr asking mockingly if I was on my medication, did I take it that morning, what kind of Judge would ask that especially when Mrs. Catherine Rodriguez, Esq. (attorney for Mr. P. G. Dwyer) read my doctor(s) note and the Judge stopped her midway and said that was enough (the transcript shows that as well). I did appeal this and yes I did submit the transcript March 4, 2019 while 3rd DCA first gave their opinion February 27, 2019 and stated because I was missing the

transcript they had to agree with the Supreme Court, however that was on a timely manner, I then questioned myself if I used the correct wording and wanted to attach every piece of evidence that I had negated that transcript as I read it over and over so yes I re-filed and asked the 2nd time to the appellate court of it could be this time an amended motion filed on March 11, 2019 and a motion for re-consideration, with all the outstanding evidence, it was stricken, and I did appeal it with the Supreme Court of Florida and they agreed on May 16, 2019 with the 3rd DCA and untimely, however I feel that because there is so much evidence and that it is a real situation that if it comes to light all in charge will face the truth and consequences all who reviewed this case first blamed it on my “mental and physical disabilities some which I did not have”, then untimely although if looking at the original I had 10 days, and I begged and asked for an amended motion to show the pure truth, because the first transcript went in for submission exactly how I submitted, the Supreme Court of Florida also received the transcript of my son’s testifying how he was scared of his father and I was afraid of the repercussions as he had made it clear not to have our son involved in anyway and keep quite, however that is why the judicial system exist for justice, never did I think my son coming forward and saying the truth would I be accused by my Mr. Daly, and Judge Manno-Schurr that I coached my son to believe he was sexually abused and then his own father to stated he did not know the perpetrator on August 31, 2018 under oath meanwhile Mr. Dwyer wrote an email to the principal Mrs. Fishman around the ending of May, 2018 stating the child’s name and saying Thank you for protecting our son before our son was improperly expelled for speaking up as well from Daddy does not like you and Mummi are separated and at what cost it does not matter, I now am at this point and have not stopped I am pro-se and not a lawyer and or Judge, Justice, however I do know as a mother I am ferociously, persistent consistent and want Justice served, properly where fundamentally the

scope of the constitution, ADA, and civil law on extreme levels have been violated both for my son and I. I want to serve as a true example as I have said before for parents that do not have a voice and are afraid to come forward of the stigma and what happens when you stand up for your child, like I did that my son being the primary victim and me as the secondary victim it is unfair because we have laws in place so none of this may occur, that is why now I am at this point to ask to please review all the evidence although it is a civil matter and it was stricken untimely I feel there was and is too much evidence and a big scandal that would have been brought to light. My ex-husband offered \$10,000 dollars five minutes before the emergency hearing for an attorney what for if Mr. Dwyer had pure intentions, we would have never been there, we would have been in there, we would have been in therapy like I had begged him and Judge Vizcaino had recommended when she let him intervene August 6, 2018 also what was the purpose so that in the Emergency hearing Mr. Daly the Gal and Mr. Dwyer both said he offered money and I declined. Yes, I did because I as a mother know that I cannot sell myself for \$10,000 dollars especially with the truth our child in the middle of all this who has been re-victimized and all the adults responsible I asked to please hold them accountable from the Eleventh Circuit where the problem originally occurred. The sexual abuse also happened at South Point Elementary and nothing has been done to these individuals who then were transferred to North Beach Elementary where my son was expelled due to a “zoning matter all of a sudden as soon as he reported his sexual abuse”, although we resided in the area. Involved in that part are Melanie Roth Fishman – Principal who backed up Jessica and made it seem like they did their, Jessica Fremson -who my son disclosed the abuse too, (nothing was ever reported, by school personnel only by me to the school police, minimal DCF engagement according to Mr. Daly referrals were coming which never did due to the fact there were no police reports although I emailed Mr. Daly August 6,

2018 the copy of the police report regarding the school, from the school administration and the two minors, Mrs. Sonia Sachelli, who at time was 4th grade teacher however left, and Ms. T. Wright Carter V.P. who was just a witness, no involvement, I asked Louis Bello (Assistant Director of School) in mid – July 2018 I have the emails upon request) to please file a grievance on my behalf of District 75 on those individuals and nothing was ever done, copied in was the Superintendent Alberto Calhavró who were aware of the whole sex abuse scandal, up to date there has not been anything done except Mr. Dwyer working in conjunction with Mrs. Fishman (the principal), and Ms. Fremson (the counselor who my son disclosed the abuse to) from August 2018 – up to date – to keep me out of the picture, how is that not part of the school district subject to a Title IX sexual assault investigation? That Mr. Dwyer, Mrs. Fishman, Mrs. Fremson, Mrs. Shakier per Mr. Daly “(the school police officer said to Mr. Daly there was no police report because the mother was suffering of mental “crazy” problems, meanwhile before any of the sexual abuse came out I was the best mother according to Mr. Dwyer and my son never wanted to leave my side which my son stated to the Guardian on July 23, 2018 as he wished to live with me and visit “Daddy”, he testified in Judge Vizcaino’s courtroom in Judge Vizcano’s chambers on June 26, 2018 that he was scared of his dad, Mr. Paul G. Dwyer esq. which he stated to Mr. Daly in his first meeting and how his dad told him to sweep the sexual abuse under the rug and forget about it on July 23, 2018. Mr. Daly on August 6, 2018 gave his first status that speaks stellar of me, which then changes in the family division as soon as Mr. Dwyer gets involved. As a parent so I was taken out of the equation, and Judge Manno-Schurr asked me if I thought this was a conspiracy, anyone looking into this situation will notice all the loopholes, I never had seen such inhumane activity and depraved ill will toward a child, just for reputations, and careers to be kept clean at the expense of a disable minor, I told and explained to

my son the constitution is a fundamental core value where our laws and Justice system come from and his dream at least the last year when we were in contact was to serve the federal government in the military he had stated in the past , how can my child continue to trust any of these adults let alone his own father if these adults have violated his own ADA rights, these school personnel should be investigated and not allowed to work with children, because who knows how many more victims are out there of any kind of abuse that are not reported but hidden and swept under the rug as Mr. Dwyer stated, sadly after my son was expelled the other child abused of him in the bathroom and suffers from high functioning autism who, should always by law have a bathroom aid, instead he would follow my son into the bathroom and forced my son to do inappropriate sexual activities and sexually abuse and physical for 2 years and 9 ¾ of a month. What school personnel administration hides this along with a dad, and that abuser gets to graduate even though he does not reside in the actual zone, and my son loved all his friends, felt at least some comfort from one of the boys who helped him finally come forward with the sexual abuse since the child who was abusing him made a public comment on May 16, 2018 and all the boys in the class heard the abuser towards my son make a sexual comment towards him and my son have a reaction, hence the reason my son came forward to me that day. I was ordered on May 28, 2019 to appear on an Emergency Motion to Reset Mediation reason being my son's graduation per Mr. Dwyer it is on June 6, 2019 per what I was informed by a state rep. it was to be on June 3, 2019 at 1:45 pm although I filed it regarding the mediation division not with Judge Manno-Schurr as she and Mr. Dwyer incite my threshold for seizures, due to the court interactions with them which I have supplied all the courts with medical documentation not to mention I had requested this since May 8, 2019 on May 23, 2019 I had an EEG brain done due to the amount of stress I have undergone not being able to see my child and

all the abuse I have encountered per Judge Manno-Schurr, Mr. Dwyer, Mr. Daly and Friday May 24, 2018 having a mole removed which requires further surgery, scheduled for July 3, 2019 (per doctors orders due to what testing May 24, 2019) emergency removal procedure of the mole and on May 29, 2019 an MRI on the brain due to all court activities and almost 300 days without seeing my child. On May 28, 2019 off the record there was no court reporter in the middle of the hearing Judge Manno-Schurr announced as I was speaking, she said June 3, 2019 was it and everyone for mediation, Ms. Catherine Rodriguez, Esq. - excellent counsel and the only honest human being in the whole course of this year admist this case all (counsel) for Mr. Dwyer, esq. she then looked at me and laughed I said it is not funny to which she usually replies I am not laughing I said I object to mediation due to the fact that you without hesitation never requested not even a piece of paper from Mr. Dwyer that day on August 31, 2018 that the burden of proof was and is on him as the petitioner and Mr. Daly as the GAL that you violated my 14th state amendment, that you mistreated me as an inhumane individual that you ordered me here today because you know all the fraud activity you Mr. Dwyer, Mr. Daly, have committed towards my son and myself she smiled again and said awe well the 3rd DCA did not agree with you since you represent yourself and your job when you do that is to be a lawyer although you are not, which is another misrepresentation of the law, because as a pro-se litigant who was and is disabled she has no right to speak to me that way, I said well you know the only reason they agreed with you is because "the transcript" had not been on file which I did immediately and then had it amended and she laughed and I said we all know the crimes you all have committed in this courtroom Judge Manno-Schurr that now that the school year is over all of you are interested in mediating the situation, I said no I will not be quite and allow all this abuse that has gone and continues today as you abruptly speak over me to others, smirk laugh it's a joke, she then said okay Motion

Denied, my response was as usual anything I ever filed with you is always denied, and please note I will not be attending mediation on Monday June 3, 2019. I left the courtroom, behind followed Ms. C. Rodriguez, esq. who kindly asked me to wait for the order and I said please just email me the order, and I stated tell your client please he is a great liar, (referring to Mr. Dwyer) after all the grieving he has caused me and mental anguish, intentional affliction-tort negligence, I also stated to Judge Manno-Schurr how they took away my son's IEP and 504 in that emergency hearing on August 31, 2018, obstruction of justice, moral turpitude at the expense of what GM son's IEP and 504 in that emergency hearing on August 31, 2018 obstruction of justice, moral turpitude at the expense of what Grant Michael, and her response was okay and your motion again denied. At which point I could not believe I was back in that courtroom with the re-triggers of that day, of August 31, 2018. I said where is any evidence that Mr. Dwyer has been able to produce to you from his fake Emergency Motion, why do you not ask him for at least a piece of evidence as the burden of proof lies on the petitioner and she I am not asking Mr. Dwyer, esq. for anything, Mr. Dwyer remained quite and Mrs. C. Rodriguez, esq. just stated for the record who the state rep I was speaking of was clearance that the graduation date for my son is June 6, 2019 the reason it is hard to accept mediation and although I will be in attendance on June 3, 2019 at 1:30 p.m. are because all of these adults in the legal realm of Judge Manno-Schurr's have lied even until May 29, 2019. Judge Manno-Schurr continues her judicial abuse of power towards my son and I. I stopped her twice on May 28, 2019, and kept asking her what was so funny as the 31st of August 2018 in the "Emergency Hearing", where the involvement caused violation of the constitution and of my constitutional rights, state amendment 14, due process substantial and procedural, federal violation of the ADA, and it needs to be addressed properly in mediation that does not resolve it where her abuse in power continues, can and will

continue like morning at 9:30 a.m. and Mr. Dwyer, Mr. Daly the Guardian who was not present to my surprise however did get a copy of the order of my motion denied once again for resetting mediation and she wants to make it seem like we reached an agreement, first burden of proof needs to be introduced by petitioner and guardian, since August 31, 2018 still awaiting from the Eleventh Circuit the Supreme Court of Florida did not accept jurisdiction and Mr. Dwyer has family in the Supreme Court of New York also as a Justice, as well as very powerful connections I cannot speculate what I do not have confirmation of however I want to know all these loopholes continue to slip by the judicial system, first the disabilities as that of my son, all these false allegations and then “untimely” look at what I filed March 1, 2019 and March 4, 2019 originally then filed an amended motion to protect and show more evidence to protect my son and anyone seeing the transcript would see what I went through on behalf of GM just for defending him. Please note I am distraught and only hope you can see this from a Mother and Son perspective who have been bullied by the Eleventh Circuit Judge Manno-Schurr’s ruling is still something I question myself when I read her reviews it is scary to see how many children have died because of her prejudicial rulings. What federal crimes can go unnoticed for so long under the Civil Rights Law, Constitution, State and Local Government on behalf of the American Disability Act and Justice not be served?