

19-6989

ORIGINAL

THE SUPREME COURT OF THE UNITED STATES

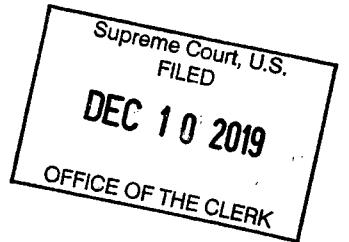
George Belt,

Petitioner,

Vs.

State of Florida,

Respondent.



On Petition For A Writ Of Certiorari To The Supreme Court

of the United States, District Of Columbia Circuit

PETITION FOR A WRIT OF CERTIORARI

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QUESTIONS PRESENTED

QUESTION 1.

A.

How it is possible that the State of Florida, Department of Revenue, Child Support Program (hereinafter referred to as DOR CSP) can enforce Fla. Stat. § 443.051 that became established from Florida State legislative actions, and is in direct conflict with Fla. Stat. § 88.6041 a Florida Statute that originated from Federal legislative actions?

B.

What can be done to stop or prevent this direct attack and violation of the “Supremacy Clause” (Article VI, Clause 2, of the US Constitution) from happening again in the future?

QUESTION 2.

The State of Florida, Department of Equal Opportunity (hereinafter referred to as DEO) claims it is statutorily forced to cooperate with the DOR CSP and does not have jurisdiction over such matters as stated in Question 1 above. The DEO Authorities are granted to it through Chapters 20, 112, and 443 of the Florida Statutes; those authorities are discussed later in more details. Pursuant to Chapter 443 of the Florida Statutes, the DEO oversees and assures proper disbursement of State funds that are regulated by Federal guidelines which could include withholding requests from other governmental departments or private entities such as the DOR CSP.

Does 42 U.S.C. § 503 and 42 U.S.C. § 654, provide and allow the Governor of the State of Florida the authority to grant the DEO it's authority in Chapters 20, 112, and 443 of the Florida Statutes: to question, conduct investigations, and undertake on actions necessary

to properly administer withholdings (such as child support order obligation payments) or other lawful deductions from a claimants weekly Re-employment Assistance Benefits (unemployment compensation)?

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Martin v. Hunter's Lessee, 14 US 304 (1816) page 13

McCulloch v. Maryland, 17 US 316, (1819) page 13

CONSTITUTIONAL PROVISIONS

The US Constitution pages 13, 15

Article VI, Clause 2, of the US Constitution, aka Supremacy Clause pages i, 12, 13

The V Amendment of the US Constitution pages 1, 11

The VI Amendment of the US Constitution pages 1, 11

The XIV Amendment of the US Constitution pages 2, 11

FEDERAL STATUTES, REGULATIONS, AND RULES

28 U.S.C. § 1254(1) page 1

28 U.S.C. §1738B page 3

42 U.S.C. § 503 page i

42U.S.C. §601-681 [Subchapter IV] page 3

42 U.S.C. § 654 page i

OTHER AUTHORITIES

Federal Full Faith and Credit for Child Support Orders Act (FFCSOA) pages 3, 14

Personal Responsibility and Work Opportunity Act (PRWORA) page 14

Uniform Interstate Family Support Act (UIFSA) pages 3, 7, 14

FLORIDA STATUTES, REGULATIONS, AND RULES

Fla. Stat. § 443.051 pages i, 2, 7, 8, 13

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Fla. Stat. § 88.6041	pages i, 8, 11
Chapters 20 of the Florida Statutes	page i,
Chapter 88 of the Florida Statutes	pages 3, 8
Chapter 112 of the Florida Statutes	page i
Chapter 443 of the Florida Statutes	page i

PETITION FOR A WRIT OF CRETIORARI

George Belt, respectfully Petition for a Writ of Certiorari to review the Judgment of the First District Court of Appeal for the State of Florida.

OPINIONS BELOW

The decision by the First District Court of Appeal for the State of Florida on September 11, 2019 Per Curiam, Affirmed; Belt v. State, No. 1D18-5030 and is reprinted in the Appendix (hereinafter referred to as App.) at 1a and 2a. The State of Florida, Department of Economic Opportunity, Re-employment Assistance Appeals Commission's December 12, 2018 appeal decision in case 18-02314 and is reprinted in the App. at 3a-4a. The Supreme Court of Florida on October 16, 2019 dismissed the Petitioners Notice of Appeal/Writ of Certiorari and is reprinted in the App. at 5a.

JURISDICTION

The Frist District court of Appeals for the State of Florida entered its final order on September 11, 2019. This Court has jurisdiction under 28 U.S.C. § 1254(1)

CONSTITUTIONAL AND STATUTORY PROVISIONS

The Fifth Amendment of the United States Constitution provides:

"No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a grand jury, except in cases arising in the land or naval forces, or in the militia, when in actual service in time of war or public danger; nor shall any person be subject for the same offense to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation."

The Sixth Amendment of the United States Constitution provides:

"In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to

be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the Assistance of Counsel for his defence.”

The First Section or the Fourteenth Amendment of the United States Constitution provides:

“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.”

INTRODUCTION

The Constitution of the United States of America has long been our nation’s single most referred to legal instrumental guidance document since the birth of this nation and or sought after freedom from under a monarch’s reign. This single document forms the foundation of the treaties, rules ,and laws that govern this great nation, and to violate any part of it intentional and unintentional cannot and should not be tolerated in any matter. The manipulation, misinterpretation, or deviation from its original intentions could be both catastrophic and devastating to the freedoms and ways of life that most American Citizens have grown to love and enjoy on a daily basis.

STATEMENT OF THE CASE

On April, 21, 2017 the Petitioner’s employment was terminated by his current employer. Therefore, on April 28 2017, the Petitioner signed up for Re-employment Assistance Benefits (hereinafter referred to as RAB), then on May 15, 2017 the DEO notified the Petitioner, by letter, that Child Support obligation payments would be withheld from his weekly RAB. The deduction would be set at the rate the DOR CSP had determined, pursuant to Fla. Stat., § 443.051(3).

The Petitioner appealed the decision (filed with the DEO on May 30, 2017) since his arrearages only, child support order was derived from the State of Ohio, and since the obligee and one of the then dependent children still lives in the State of Ohio pursuant to Fla. Stat., § 88.2051 Continuing Exclusive Jurisdiction (hereinafter referred to as CEJ) the State of Ohio retains its CEJ. Even though the language differs slightly from the State of Florida Statutes from the Federal Full Faith and Credit for Child Support Orders Act (hereinafter referred to as the FFCSOA), the FFCSOA also embraces CEJ as a lynchpin (28 U.S.C. §1738B).

Meanwhile, the Uniform Interstate Family Support Act (herein after referred to as the UIFSA). The UIFSA is built on a “one order, one time, one place” construct. A U.S. tribunal may not enter or modify a current support order where a valid one already exists. Unless certain conditions are met: (1) no one resides in the issuing state but both of the individual parties consent in the record for the tribunal to retain CEJ; or (2) at least one party remains in the state but the parties agree in writing to vest jurisdiction in another state (neither condition was met). UIFSA’s major core concept is CEJ. Furthermore, the UIFSA within (42U.S.C. §601-681 [Subchapter IV]) provides rules under which a tribunal in another state determines whether or not it has the authority to modify the issuing state’s order. The support order that governs current support obligation payments is known as the “controlling order”.

Equally important, Chapter 88 of the Florida Statutes is it’s adopted version of the UIFSA, and pursuant to Fla. Stat., §88.2071”Determination of controlling child support order.— (1) If a proceeding is brought under this act and only one tribunal has issued a child support order, **the order of that tribunal controls and must be recognized**”. The petitioner has never been serviced any documents stating that the DOR CSP wanted CEJ or has attempted to modified the Petitioner’s child support obligation payment amounts. Therefore

the RAB withholding amount should be equal to the monthly payment amount determined by the State of Ohio, Portage County, Child Support Enforcement Agency (hereinafter referred to as the CSEA) of Portage County, in the State of Ohio.

Additionally, when the Petitioner filed his May 30, 2017 appeal of the child support obligation withholding amount to the Re-employment Assistance Appeals Commission (hereinafter referred to as the RAAC) determined by the DOR CSP; the Petitioner also submitted documents as evidence to prove that his State of Ohio, child support order (hereinafter referred to as OCSO) current obligation was arrearages only and was currently set at a \$248.00 monthly obligation payment. Equally important; that April, May, and June 2017 obligation payments had already been made by the petitioner; additionally the DOR CSP was fully aware of both due to the facts, due to some of the documents submitted by the Petitioner on May 30, 2017 had originated from the DOR CSP and true copies of the other documents (those not originating from the DOR CDSP) the Petitioner submitted were also serviced on the DOR CSP as well.

Continuing forward, on June, 5, 2017 the Petitioner forwarded a copy of the motion filed with the Circuit Court of the Ninth judicial Circuit, In and For Osceola County Florida and enclosures to be submitted as evidence in the appeal of the DEO's May, 15, 2017 decision of the withholding amount from the Petitioner's weekly RAB for the Petitioner's OCSO. The DEO received, according to Domestic Return Receipt that the DEO date stamped, June 12, 2017, on the return receipt of parcel.

Then on June 20, 2017, during the telephone hearing (for the determination of RAB qualification); at roughly 2:00 p.m. with the Honorable A. Muhammad, an appeals referee for the DEO; the referee along the Petitioner, prior to contacting the Petitioner's prior employer.

Referee Muhammad, asked the Petitioner about the motion sent to the DEO on June 5, 2017. The Petitioner explained to referee Muhammad that it was for the child support withholding appeal and was not relevant or pertinent to the hearing about to convene on determination of benefits or not. This was the first document mix-up of many conducted by the DEO in the two different cases the Petitioner had with the DEO. The first for determination of RAB and the second (this case) over the amount being withheld for child support obligation. This was one of the document mix-ups, which led to the Appellant having to call the DEO and then actually file a “Notice of Assertion” with the DEO.

Moving Forward, to June 30, 2017, being concerned about the deposition of the appeal request documents. The Appellant forwarded a letter to the DEO making sure that they understood that the documents along with the petitioner’s letter addressed to them, that they received on June 12, 2017 were intended to be an appeal request from the Petitioner in the Child Support withholding case and not the weekly RAB determination case with the DEO.

Then, on July 14, 2017, the DEO notified the Petitioner that it approved the intentions to withhold 40% of the Petitioner’s weekly RAB for OSCO obligations. On July 17, 2017 the Petitioner attended the hearing held on the “Motion For Temporary Relief From Department of Revenue’s Action and Request for State Appointed Council” filed on June 9, 2017 with the Circuit Court of the Ninth Judicial Circuit, In and For Osceola County, Florida. The results of this hearing were never reported to the DEO by the DOR CSP even though their legal representative Nancy Lutz, and a case worker for the DOR SCP where both present at the hearing? One of the hearing notes and the outcome of that hearing was: “3. No more interceptions were to be made for the month of July (2017).

Furthermore, on August 4, 2017 the Petitioner sent a letter to the DEO regarding his concerns over the length of time the DEO is taking on the Child Support Withholding Case's appeal process (no scheduled hearing). Secondly, the letter was sent because no physical copy of any acknowledgement of the document (appeal request) being filed with the DEO was ever sent to the petitioner; nor is there a copy of such a letter within the "Record on Appeal". The Petitioner after checking the DEO's website daily from July 17 thru August 4, 2017 did not see a posting online at the DEO website of the document's existence, until after the letter had already been forwarded to the DEO on August 4, 2017, but yet, the DEO posted that on July 24, 2017, "paper appeal request filed and uploaded by dh" which did not actually get posted until August 4, 2017.

Regardless, on August 12, 2017 The Petitioner went online to the DEO's website and requested to have two Subpoena Duces Tecum issued for discovery purposes. The first Subpoena Duces Tecum was requested to be issued to Circuit Court of the Ninth Judicial Circuit, In and For Osceola County Florida, requesting for a copy of the file for Case Number: DR-04-47556, also requesting for the transcripts of the December 11, 2013 and the July 17, 2017 hearing, while the second Subpoena Duces Tecum was requested to be issued to DOR CSP requesting for the Child Support Programs complete file of the Petitioner's OCSO obligation case. Also on August 12, 2017 the Petitioner went online to the DEO's website and submitted the document "Amendment to Subpoena Requests" to explain why the request for the two very unusual Subpoena Duces Tecum.

On August 23, 2017 in the transcripts of the phone hearing, at roughly 10:00 a.m., the Petitioner plead his case about the child support withholding amount, in his closing statement to K. Lonkani the hearing referee. Immediately thereafter, roughly just two hours later, the

appeals referee, hands down his decision concerning the phone hearing held earlier that same day. In the referee's decision's "Findings of Facts" section, the hearing referee briefly mentions the fact that the Petitioner's OSCO obligation is arrearages only and originated out-of-state. Continuing down the document in the "Conclusion of Law" nothing was mentioned by the appeals referee about Florida Statute §88.2051(1) or §88.6041 superseding over Florida Statute §443.051. Actually the appeals hearing referee, K. Lonkani states: "No evidence has been provided that would mitigate that responsibility" This plainly ignores all the documents that the Petitioner forwarded and presented as evidence to the DEO back on May 30, 2017.

Shortly afterwards, on September 5, 2017 the Petitioner contacted the DEO, by letter and for the first time presents to the DEO the Court order from the July 21, 2017 hearing. Then on September 7, 2017 the RAAC, the Respondent, forwarded a "Notice of Docketing" document notifying the Petitioner that the August 23, 2017 referee's decision is being reviewed. Followed by, the Respondent's "Notice of Order" that it forwarded to the Petitioner on December 11, 2017, notifying the Petitioner of a procedural error and the original August 23, 2017 appeals referee decision: "...the case must be remanded for further hearing."

The Respondent emphasized in a footnoted comment of the first page of the order that Chapter 88 of the Florida Statutes does not govern this issue, but they refuse to offer any explanation as to their opinion. Despite the Respondent's opinion the Petitioner interprets that Fla. Stat. Chapter 88 does govern the issue at hand in the Appeal (the amount of child support obligation that should be withheld from the Petitioner's weekly RAB). The Child Support Obligation originated in the State of Ohio and is annotated in the record as a UIFSA child support case, accordingly it then is pursuant to Fla. Stat., §88.2051, Ohio still retains CEJ on

the support obligation, therefore Fla. Stat., §88.6041 should determine the amount of OCSO payments regardless if the petitioner is receiving RAB or not in the State of Florida, seems how the State of Ohio has no law worded similarly to Fla. Stat., §443.051.

Secondly, the RAAC on page two of their December 11, 2017 order states: "Since the Claimant bears the burden of establishing a withholding amount other than 40 % set forth in the statute, he should provide a copy of the order which established the child support obligation to the referee and to the Department of Revenue, Child Support Enforcement Program, in sufficient time to be received by them at least 24 hours prior to the next scheduled hearing." The only documentation every sent or given to the Petitioner regarding the amount to be paid by the Petitioner, by the State of Ohio was submitted to the DEO back on June 12, 2017 in that document just below the main header, on the right hand side, it clearly states:

- a. In the first line: "MONTHLY SUPPORT"
- b. In the second line: "CHILD: \$0.00"
- c. In the third line: "ADDITIONAL: \$248.00"
- d. In the fourth line: "TOTAL: \$248.00"

Additionally, the letter dated May 19, 2017 from the DOR CSP to the Petitioner, clearly states in number one, the second pinpoint: "The support order we are enforcing requires you to pay \$248.00 monthly", and this document was also forwarded to the DEO in that document packet mentioned above that was sent to them on May 30, 2017, along with copies of two money orders paying for the unpaid child support obligation previously owed by the Petitioner, a balance of \$113.77 for May 2017 child support obligation and the full amount due \$248.00 for June 2017 child support obligation, what more evidence or documents did the Respondent require?

Continuing on, to after more hearings and delays on August 01, 2018 the Honorable Referee Kris Lonkani, handed down his decision of the July 31, 2018 phone hearing held with the Petitioner. Within the order it states: "Consideration was given to the claimant's contention that is the absence of as order transferring jurisdiction from the state that issued the order to the State of Florida, the DOR has no jurisdiction to make deductions. The referee in this case has no authority to review the jurisdiction of the Florida Department of Revenue. As such is outside of the authority of the hearing officer as well as outside of the scope of review, the contention is respectfully rejected.

Should the claimant feel that the amount being withheld is not in accordance with an existing order of a court, the claimant should contact the Florida Department of Revenue, Child Support Unit, as directed in the withholding letter. A copy of the withholding letter was included with the notice of telephone hearing." This tells the Petitioner even though he provide documents from by the State of Ohio and the DOR CSP on May 30, 2017, the DEO continuous to ignore those documents proving the OCSO obligation was only \$248.00 monthly or \$57.23 weekly instead of the \$110.00 (40% rate) they deducted.

In one last effort to try to persuade the RAAC into rethinking its stance on the main issue at hand in this case, the Petitioner sent the final request for review to the RAAC, dated August 21, 2018. And in that request the Petitioner stated: "Whereas the Claimant disputes that (CSEA) has never attempted to or has lawfully obtained jurisdiction to enforce or modify the claimants child support obligation pursuant to Chapter 88 of the Florida Statutes through the state (Ohio) that issued the original and still enforcing child support order therefore the (CSEA) is falsely and illegally claiming that the CSEA has or had proper jurisdiction of the claimants child support order. "

Further into the letter the petitioner also states: “Additionally, pursuant to July 17, 2017 judgement passed down by the Circuit Courts of Osceola County Florida, case number 04-0004756 CA” (should be 04-DR-0004756 CA UF) “the DOR was ordered, ‘No further intervention shall be made in July’, and then on October 25, 2017 in yet another hearing held by the Circuit Courts of Osceola County Florida, case number 04-0004756 CA the DOR requested permission to enforce child support order and the Petition was Denied on October 30, 2017.”

“The DEO’ RAAC continues to state that it is not their responsibility to determine this” (jurisdictional authority of the DOR CSP) “and since the CSEA notified their department they are obligated under statute to comply. The claimant questions the DOE on their obligations as the custodian of the States of Florida funds in which they control, is their obligation to the people of the State of Florida to assure at all costs that the CSEA’s records are true and accurate. And in any case of dispute should the DEO not halt the disbursement of withheld funds or set the funds in escrow until a proper determination hearing (which was never held) to determine if the CSEA did in fact obtain proper jurisdiction over the claimants child support obligation enforcement.”

The RAAC claims they do not have the authority to make jurisdictional decisions of the DOR CSP authority to determine the amount to be withheld from the petitioner’s RAB, then why was this case not referred over to the Circuit Courts. Which by the way had already ruled on this case and a copy of those orders had been forwarded to the DEO but they refused to acknowledge them or the fact stated in that August 21, 2018 forwarded documents that the OSCO obligation was only \$57.23 weekly.

This statements are slightly confusing as to what the Petitioner was trying to actually state, it is not the fact of whether the DOR CSP has jurisdiction to enforce his OSCO but rather the obligation's payment amount that should have been deduct by the DEO (the DOR CSP jurisdictional powers to alter the amount determined by the Out-of-State controlling child support order) and not the authority to be able enforce the OSCO or not.

An interesting side point the Petitioner would like to point out the second part of Fla. Stat., §443.051(3) (b) that the DOR CSP intentionally ignores: "... If the amount deducted exceeds the support obligation, the Department of Revenue shall promptly refund the amount of the excess deduction to the obligor." But the Petitioner never promptly received these funds despite that the DOR SCP where fully aware of the extra funds being withheld as they mentioned in a transmittal to the State of Ohio "ALSO LARGE SUMS OF MONEY HAVE COME IN, LARGER THAN WHAT IS ORDERED"

One last but yet very important note, the DOR CSP had no representative attend any of the phone hearings nor did they submit any document other than their original letter stating the withholdings will be pursuant to Fla. Stat., §443.051(3) and not Fla. Stat., §88.6041. Equally important the DOR CSP made no further statements during the appeal process to back their withholding decision, they simply stated this is the amount to withhold pursuant to Fla. Stat. §443.051(3) in their original May 15, 2017 letter and that was it. The petitioner feels that this is a direct violation of the right of "Due Process", granted by the Fifth Amendment of the U.S. Constitution; a violation of the right of "To be confronted with the witnesses against him", granted in the Sixth Amendment of the U.S. Constitution; and finally a violation of the right of "... nor deny to any person within its jurisdiction the equal protection of the laws.", granted by the Fourteenth Amendment of the U.S. Constitution.

Then after the final RAAC decision was handed down on October 22, 2018 the Petitioner continued to seek justice in this issue and on November 20, 2018 filed a “Notice of Administrative Appeal”. Followed shortly by filing of the Petitioner’s “Appellant’s Initial Brief” on February 4, 2019, that in turn was countered by the RAAC’s April 1, 2019, “Answer Brief of the Reemployment Assistance Appeals Commission”. Thereafter the petitioner on May 6, 2019 filed his “Appellant’s Reply Brief”, which debunked the RAAC’s Answer Brief and its references within it, thusly the Petitioner’s Reply Brief went unanswered by the RAAC.

The First District Court of Appeals on September 11, 2109 handed down its “Per Curiam, Affirmed” decision, the Petition then on October 10, 2019 the Petitioner filed a “Notice of Appeal/Writ of Certiorari” to the honorable Florida Supreme Court, where it dismissed the Appeal/Petition on October 16, 2019

REASONS FOR GRANTING THE PETITION

The hierarchy of our Legislative Branch of government was first established at the Philadelphia Convention of May 1787, when the first draft of the US Constitution was signed on September 17, 1787, and Ratified later on June 21, 1788. Our fore fathers, back then, designed a judicial system that was originally to be non-persuaded by outside public manipulations, controlled by the constitution, and accepted guidance through the current treaties, acts, and various laws of the land.

Has our judicial system been infiltrated by exterior influences that a lower court is no longer bound by the US Constitution, and can hand down decisions that possibly are altered by the political, financial, or societal impact it could cause. According to Article VI, Clause 2 (the Supremacy Clause) of the US Constitution: no state law stemmed from state level

legislative consequences can or will supersede those derived from federal legislature's treaties or laws. The Supremacy Clause was challenged early on in our country's history and this Honorable Court in *Martin v. Hunter's Lessee*, 14 US 304 (1816), *McCulloch v. Maryland*, 17 US 316, (1819), and *Cohen's v. Virginia*, 19 US 264 (1821) all demonstrated the importance and stability of the US Constitution's Supremacy Clause. Moreover, the Doctrine of Preemption advocates that federal law preempts state laws that are in divergence with federal laws in accordance to the principles bestowed within the conflicting laws.

Furthermore, it is a sad day for the judicial process when; this great nation's honorable justices of all levels (Circuit, State, and Federal) of the Appellate process can have their decision influenced in a case review by the amount of liability, labor, and a substantial initial increase in the cost of administration protocol changes involved to correct the injustice that is being conducted on a daily basis against the unemployed non-custodial parents of the Great State of Florida or any other state that has laws, statutes, or codes that are worded similarly to those in Fla. Stat., §443.051. If this injustice is happening in Florida it is almost certain that it is also happening in others states within the union (the dire importance of this case's review and decision handed down by this Honorable Court)..

If the Supremacy Clause of the U.S. Constitution does not play into factor here; then the overall judicial branch that our government is founded on, is being made a mockery of. A prominent injustice that clearly violates established law principles within the U.S. Constitution that: "Federally derived laws override and supersedes laws stemming from individual State legislative bodies". Resulting thusly, in a huge potential of a miscarriage of justice within the judicial system, possibly denying a fair and equal impartial judgment to all

parties involved in any Child Support dispute cases such as this one that was not handled in a county, circuit, or family court.

Equally important, The State of Florida risks losing large sums of block grants issued to it for compliance of UIFSA, and FFCSOAA guidelines: if these non-compliant UIFSA, FFCSOAA, and the PRWORA actions of DOR CSP are continued to be allowed.

It also is worth noting, that the apparent purpose of mandatory jurisdiction in these cases is to achieve a degree of finality and uniformity of law. If this Honorable U.S. Supreme Court were not required to hear an appeal or grant Writs of Certiorari, the district court decisions in question might remain on the books for years without being either approved or disapproved. As a result, statutes or constitutional provisions might be enforced in some appellate districts but not others. Mandatory Supreme Court jurisdiction greatly diminishes these possibilities, while increasing the potential of uniformity throughout the entire judicial branch of the Government. It is understood that the congressional intention of the UIFSA, FFCSOAA, and the PRWORA was to simplify the Child Support Enforcement Program of the Social Security Act throughout the nation with uniformity of policies and jurisdiction where multiply states were involved in the Child Support Enforcement.

By granting a review of the requested record within will allow the strengthening of the original congressional intent within the three acts mentioned here and above within, the Supremacy Clause of the U.S. Constitution, while assuring proper guidance of policy protocol for the three above mentioned acts to each and every individual state, tribe, and territory under the judicial authorities mandated by any instrumental decision handed down by this Honorable U.S. Supreme Court.

CONCLUSION

In 1950 nearly 93% of all families with children under the age of 18 had a structuring with both parents and only 7% were single parent families: however those numbers have greatly changed over the years, in 2015 almost 12 million single-parent homes existed, that's roughly 32% of all families with children under the age of 18: a 25% increase in just 65 years and that static is persistently increasing¹.

Today those numbers are still increasing, but more staggering is the amount of money being paid for child support through the Social Security Act, and by non-custodial parents assuring the best overall welfare the US can provide for the children of single-parent homes. Unfortunately, those numbers are sure to continue to rise as divorce rate increase, and especially now that un-wedlock child birth is more societally accepted.

If we do need to defend what the US Constitution stands for if not then we will stand to lose our freedoms that set us aside from all other countries in the world. The defense of the US Constitution has to be from either foreign or domestic violators or sources equally: for anyone that attacks this legal document also attacks this country's citizens and our way of life.

Furthermore, the Petitioner hopes that this Honorable US Supreme Court sees the importance of the reviewing of this case and the petition for a writ of certiorari should be granted.

1..<https://www.census.gov/newsroom/press-releases/2016/cb16-192.html>