

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

\_\_\_\_\_  
IN THE  
SUPREME COURT OF THE UNITED STATES  
\_\_\_\_\_

ELIZABETH ALEXANDER PETITIONER  
(Your Name)

vs.  
BLOOMINGDALES / MACY'S RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

THE FOURTH CIRCUIT COURT OF APPEALS, RICHMOND, VA  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

ELIZABETH ALEXANDER  
(Your Name)

3415 SPRING CLUB PLACE  
(Address)

SILVER SPRING, MD 20904  
(City, State, Zip Code)

240 821 3008  
(Phone Number)

### QUESTION(S) PRESENTED

The FEDERAL COURT IN GREENBELT, MD AND THE FOURTH CIRCUIT COURT IN RICHMOND, VA, DENIED MY STATUTORY RIGHTS ASSERTED UNDER BOTH TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 AND THE MONTGOMERY COUNTY, MD CODE OF HUMAN RIGHTS, AFTER I FILED VALID CHARGES AGAINST BLOOMINGDALES/MACYS with the EEOC ON APRIL 26, 2016. THESE CHARGES SPECIFIED RACIAL DISCRIMINATION, MAINTENANCE OF THE PERVASIVE HOSTILE WORK ENVIRONMENT, UTTERANCE OF PUBLIC SLANDER AGAINST ME BY THE COMPANY'S DEPARTMENT MANAGER, RETALIATION AGAINST ME WITH FALSE ACCUSATIONS OF MISCONDUCT A PHYSICAL ASSAULT BY A SECOND DEPARTMENT MANAGER, COERCION BY BLOOMINGDALES STORE MANAGEMENT AND THE REGIONAL HUMAN RESOURCES MANAGER TO CONCEDE MY STATUTORY RIGHTS. SIXTY FOUR DAYS AFTER MY CHARGES WITH THE EEOC WERE FILED, BLOOMINGDALES/MACYS EXECUTED A RETALIATORY TERMINATION AGAINST ME, THIS TERMINATION WAS WELL WITHIN THE TEMPORAL PROXIMITY OF MY PROTECTED ACTIVITY RIGHTS OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964 as well as the MONTGOMERY COUNTY, MD, CODE OF HUMAN RIGHTS (BASED ON A FORMAL, WRITTEN WORK SHARING AGREEMENT WITH THE EEOC). THIS RETALIATORY TERMINATION WAS UNLAWFUL AND A PROHIBITED VIOLATION OF MY ASSERTED STATUTORY RIGHTS.

## LIST OF PARTIES

☒ All parties appear in the caption of the case on the cover page.

☐ 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:

## RELATED CASES

## TABLE OF CONTENTS

OPINIONS BELOW.....	1
JURISDICTION.....	
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED .....	
STATEMENT OF THE CASE .....	
REASONS FOR GRANTING THE WRIT .....	
CONCLUSION.....	

### INDEX TO APPENDICES

APPENDIX A	Case No: PWG-17-3283 Order (Summary JUDGEMENT) 38 pages
APPENDIX B	Appeals Court Case No: 19-1657 JUDGEMENT
APPENDIX C	Rehearing of Appeal Judgment and Needs to be submitted
APPENDIX D	Appeal of Rehearing Judgment by Fourth Circuit Appeals Court
APPENDIX E	Response to Blomminade's Informal Briefs Including Supplemental Documentation Appendices -5. EXHIBITS
APPENDIX F	

## TABLE OF AUTHORITIES CITED

### CASES

### PAGE NUMBER

### STATUTES AND RULES

1. TITLE VII OF CIVIL RIGHTS ACT OF 1964,
2. THE MONTGOMERY COUNTY CODE OF HUMAN RIGHTS, MONTGOMERY COUNTY CODE 27-1 et. seq. ("MCHRA"),
3. THE U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION referred to as the EEOC, pursuant to Title VII of the CIVIL RIGHTS ACT OF 1964 as amended (42 U.S.C. § 2000(e)), referred to as Title VII.

OTHER

THE EEOC and MONTGOMERY COUNTY COMMISSION OF HUMAN RIGHTS <sup>HAVE A</sup> WORKSHARING AGREEMENT, IN RELATION TO ALLEGING A VIOLATION OF TITLE VII WITH REGARD TO) BLOOMINGDALES/MACYS CORPORATE COMPLIANCE OF THE EEOC GUIDELINES

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 courts**:

The opinion of the United States court of appeals appears at Appendix \_\_\_\_\_ to the petition and is

☒ reported at CASE # 19-1657; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished. CASE # 19-1657

The opinion of the United States district court appears at Appendix \_\_\_\_\_ to the petition and is

☒ reported at 8:17-cv-03283-PWG; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

☐ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix \_\_\_\_\_ to the petition and is

☐ reported at \_\_\_\_\_; or,  
☐ has been designated for publication but is not yet reported; or,  
☐ is unpublished.

The opinion of the \_\_\_\_\_ court appears at Appendix \_\_\_\_\_ 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 OCTOBER 17, 2019.

☐ No petition for rehearing was timely filed in my case.

☒ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: NOVEMBER 25, 2019 and a copy of the order denying rehearing appears at Appendix       .

☐ 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 \_\_\_\_\_.  
A copy of that decision appears at Appendix \_\_\_\_\_.

☐ A timely petition for rehearing was thereafter denied on the following date: \_\_\_\_\_, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

☐ 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. § 1257(a).

## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

THE FAILURE OF BOTH THE LOWER FEDERAL COURT IN GREENBELT, MARYLAND AND THE FOURTH CIRCUIT COURT OF APPEALS IN RICHMOND, VIRGINIA TO COMPEL AN EMPLOYER TO HONOR THEIR COMPLIANCE TO PROTECT THE ASSERTED STATUTORY RIGHTS OF THEIR EMPLOYEES BASED ON THE CONSTITUTIONALLY RECOGNIZED RIGHTS OF EMPLOYEES ~~THE CONSTITUTIONALLY MANDATED~~ UNDER THE CONGRESSIONALLY MANDATED PROVISIONS OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964. THIS LACK OF COMPULSORY ENFORCEMENT BY THE COURTS OF EMPLOYEES' CIVIL RIGHTS HAS BECOME A PATTERN OF A LACK OF ENFORCEMENT IN OTHER SIMILAR COURTS, INCLUDING NEW YORK AND CALIFORNIA TO ALLOW SUPPRESSION OF THE ASSERTED STATUTORY RIGHTS OF EMPLOYEES UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964. THE COMPLIANCE MANAGER, A LAWYER, MS LORETTA GARCIA, THE MONTGOMERY COUNTY, MARYLAND, HUMAN RIGHTS COMMISSION ASSERTS THAT THIS CASE HAS STRATEGIC SIGNIFICANCE FOR THE FUTURE EVOLVEMENT OF ~~THE~~ EMPLOYMENT LAW IN THE UNITED STATES.



### STATEMENT OF THE CASE

BLOOMINGDALE'S/MACYS EXECUTED A RETALIATORY TERMINATION, WHICH WAS UNLAWFUL, AGAINST ELIZABETH ALEXANDER ONLY SIXTY FOUR DAYS AFTER MISS ALEXANDER FILED CHARGES AGAINST BLOOMINGDALE'S/MACYS WITH THE EEOC. AN THESE CHARGES INCLUDE MULTIPLE DOCUMENTED COMPLAINTS OF ABUSE UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964. THESE ABUSES INCLUDED: RACIAL DISCRIMINATION, PERMISSIVE MAINTENANCE OF A HOSTILE WORK ENVIRONMENT, UTTERANCE OF A PUBLIC SLANDER AGAINST MS ALEXANDER BY A CORPORATE MANAGER, FALSE ACCUSATIONS OF MISCONDUCT, A PHYSICAL ASSAULT by another corporate manager AS WELL AS COERCION by BLOOMINGDALE'S/MACYS MANAGEMENT TO INTIMIDATE AND FORCE MISS ALEXANDER TO CONCEDE HER ASSERTED STATUTORY RIGHTS UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964.

### REASONS FOR GRANTING THE PETITION

THE U.S. SUPREME COURT IS THE LAST RESORT  
OPEN TO MISS ALEXANDER TO RECOGNIZE AND GRANT  
HER JUSTIFIED EMPLOYEE CIVIL RIGHTS  
UNDER TITLE VII OF THE CIVIL RIGHTS ACT  
OF 1964.

## CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Elizabeth ALEXANDER

Date: 02/20/2020