

No. 20-6501

IN THE  
SUPREME COURT OF THE UNITED STATES

SHANNON RILEY,

Petitioner,

v.

CARRIE KATHLEEN MEEHAN

Respondent

On Petition for a Writ of Certiorari  
to the Supreme Court of South Carolina

SUPPLEMENTAL BRIEF OF PETITIONER

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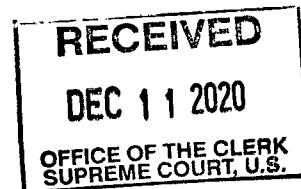


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SUPPLEMENTAL BRIEF

COMES NOW, Petitioner who files her Supplemental Brief pursuant to Supreme Court Rule 15(8), "Any party

may file a supplemental brief at any time while a petition for a writ of certiorari is pending, calling attention to new cases, new legislation, or other intervening matter not available at the time of the party's last filing. A supplemental brief shall be restricted to new matter and shall follow, insofar as applicable, the form for a brief in opposition prescribed by this Rule."

Key portion of Petitioner's request for review on a writ of certiorari as to the Supremacy Clause, of the United States Constitution (Article VI, Clause 2), is especially warranted. The Supremacy Clause establishes that the Constitution, federal laws made pursuant to it, and treaties made under its authority, constitute the "supreme Law of the Land", and thus take priority over any conflicting state laws. It provides that state courts are bound by, and state constitutions subordinate to, the supreme law.

The Order of the Supreme Court of South Carolina declining to entertain Petitioner's Writ of Mandamus cites Rule 245, South Carolina Appellate Court Rules (SCACR), and cites *Key v Currie*, 305 S.C. 115, 406 S.E. 2d 356 (1991), both requiring public interest.

Petitioner's Writ of Mandamus is the Full Faith and Credit Clause of the United States Constitution, (Art IV, Section 1) addresses the duties that states within the United States have to respect the "public acts, records, and judicial proceedings of every other state."

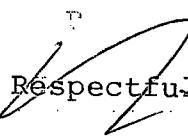
In this instance, The Supremacy Clause, constitutes the "supreme Law of the Land" and thus takes priority over conflicting South Carolina laws and that the State of South Carolina is bound by, and state constitutions subordinate to the supreme law.

In *Janet Reno, Attorney General et al v Charlie Condon, Attorney General of South Carolina* 528 U.S. 141 (2000), the Court primary holding that Congress does not impermissibly commander states when it regulates their activities without requiring them to regulate the activities of their citizens.

This holds true regarding "public acts, records, and judicial proceedings of every other state." in this instance the State of Kansas.

#### CONCLUSION

This Court should grant the petition.

  
Respectfully submitted;

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