

20-6560

Supreme Court, U.S.
FILED

NOV 30 2020

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IN THE
SUPREME COURT FOR THE UNITED STATES

TERM

DOCKET NUMBER SUPPLIED AS:

Lorenza Gerald Fenebee Jr.
Petitioner

v.

Virginia Department of Corrections "OFFENDER(S) DISCIPLINARY,
MANAGER" - Karen Stapleton, et al.
Respondent(s).

PETITION FOR A WRIT OF HABEAS CORPUS TO THE UNITED
STATES 4TH CIRCUIT COURT OF APPEALS

I, Petitioner Ask'(s) For This,

ORIGINAL

Lorenza G. Fenebee Jr.
(Pro-Se Petitioner) - Lorenza Gerald Fenebee Jr.
Waller(s) Ridge State Prison
P.O. Box 759
Big Stone Gap, VA 24219

QUESTION(S) PRESENTED

- (1) WHETHER - The "MAKING AND ENFORCEMENT OF POLICY AND CUSTOM" From the Virginia Department of Corrections "ENTIRE INSTITUTIONAL DISCIPLINARY PROCEDURE" must Grant "CERTIORARI" Reviewing by the Supreme Court before any judgment is rendered by the 4th Circuit Court of Appeals?
- (2) WHETHER - A prisoner have "SOME REASONABLE PRIVACY RIGHTS" to use a inmates' prison bathroom?
- (3) WHETHER - A prisoner have a right to not be "FALSELY DISCIPLINARY CHARGED"?
- (4) WHETHER - A prisoner have a right to not be subjected to "ONGOING RETALIATION(S)" because of "MULTIPLE CIVIL PROSECUTION(S)"?
- (5) WHETHER - A (Pro-Se Petitioner) have a right to "ARENA AN AMENDED §1983 COMPLAINT AFTER JUDGMENT": on any issue?

PARTIES INVOLVED

Fenebee v. Stapleton, et al., Civil Action Number: 7:19-cv-00254 (P.M.S.), United States District Court for the Western District Court of Virginia. (Memorandum Opinion entered on March-9th-2020, Order Denying (Petitioner(s)) Motion for Reconsideration and Denying Motion to Amend 2nd Amended § 1983 Complaint on May-11th-2020, and Minute Order Denying Motion for Reconsideration and Motion to Amend 3rd Amended § 1983 Complaint on July-27th-2020).

Lorena Fenebee v. Karen Stapleton, et al., Docket Number: 20-7206, United States 4th Circuit Court of Appeals. (Pending Petition for Appeal).

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APPENDIXES(S) ~~APPENDIXES~~ is Order(s) from the United States District Court in Civil Action Number: 7:19-cv-00254 (P.M.S.);

APPENDIX D is the Virginia Department of Corrections "OPERATING PROCEDURE" #862.1 For "OFFENDERS DISCIPLINARY";

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APPENDIX E is the Virginia Department of Corrections "OPERATING PROCEDURE" #038.3 For "POISON RAPE ELIMINATION ACT";

APPENDIX F is the "INITIAL DISCIPLINARY OFFENSE REPORT" from August-5th-2017 of "OFFENSE CODE": 137(b) and "OFFENSE TITLE": Indecent Exposure;

APPENDIXES(S) F(1-7) is the "ENTIRE INITIAL DISCIPLINARY PROCEDURE" from August-5th-2017 of "OFFENSE CODE": 137(b) and "OFFENSE TITLE": Indecent Exposure;

APPENDIXES(S) G(1-9) is the "ENTIRE RE-HEARING DISCIPLINARY PROCEDURE" from August-5th-2017 and September-8th-2017 of "OFFENSE CODE": 137(b) and "OFFENSE TITLE": Indecent Exposure;

APPENDIX H is the "APPEAL" of the "2nd DISCIPLINARY PROCEDURE" from ~~January~~ May-25th-2020 of "OFFENSE CODE": 242(a)

and "OFFENSE TITLE": Possession of Intoxicant(s);

APPENDIX I is the "MEMORANDUM" of the "ENTIRE 2nd DISCIPLINARY PROCEDURE" From June-22nd-2020 of "OFFENSE CODE": 242(a) and "OFFENSE TITLE": Threatening Bodily Harm to any Person.

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DECISION(S) BELOW

The decision(s) of the United States 4th Circuit Court of Appeals is
unreported and currently being adjudicated in Record # 20-7206, and
the Memorandum Opinion(s) and Order(s) of the United States

District Court for the Western District Court of Virginia, (Roanoke Division), is not reported nor yet published, but a copy of all of it(s) "MEMORANDUM OPINION(S), ORDER, AND MEMORE ORDER" is attached as Appendix(es) A - C to support this petition fact finding(s). Id.

JURISDICTION

This Honorable United States(s) Supreme Court have "JURISDICTION" to determine this proceeding by it(s) "CERTIORARI REVIEW(S)" of a case pending in the United States(s) 4th Circuit Court of Appeals(s), pursuant to 28 U.S.C. § 2101.(e) and United States(s) Supreme Court "RULE" 11.

Especially under it(s) "ORIGINAL JURISDICTION", pursuant to 28 U.S.C. § 1251 (a and (b)(2)); For the "GRANTING OF CERTIORARI" when there(s) a dispute amongst the United States(s) Court of Appeals(s), and there(s) an "IMPORTANT QUESTIONS OF FEDERAL LAW" that has not been, but need(s) to be settled by this Honorable Court, pursuant to United States(s) Supreme Court "RULE" 10.(a) and (c)

That it(s) issuance will "ATO ITS RESPECTIVE JURISDICTION" from ~~the~~ it(s) interpretations(s) for the "USAGES AND PRINCIPLES OF LAW" by it(s) Chief Justice, Justice(s), and lower court Judge(s), pursuant to 28 U.S.C. § 2652 (a-b); Which serve(s) its "PUBLIC INTERESTANCE" to justify it(s) deviation from "NORMAL APPELLATE PRACTICE" to require this Honorable Court "IMMEDIATE DETERMINATION" before judgment is entered by the United States(s) 4th Circuit Court of Appeals(s), pursuant to United States(s) Supreme Court "RULE" 11; Wherein . . . Two or more judgment(s) by the Virginia Western District Court are sought to be

reviewed by a single "HART OF CERTIORARI" to that same court that involve identical or closely related question(s) covering all of it(s) judgment(s) that has surfaced, pursuant to United States(s) Supreme Court "Rule" 12.4.

CONSTITUTIONAL, STATUTORY PROVISION(S), AND RULE(S) INVOLVED

This petition involves(s) the United States(s) Constitutional 1st, 4th, 8th, and 14th §1 "AMENDMENT(S)" that provides(s):

"1st AMENDMENT", Free exercise to petition the Government for a redress(ment) of grievance(s);

"4th AMENDMENT", The right of the people to be secure against Unreasonable Search(s) and Seizure(s);

"8th AMENDMENT", Nor Cruel and Unusual Punishment(s) Inflicted; and

"14th §1 AMENDMENT", No State shall Make or Enforce any Law which shall abridge the privilege(s) or Immunity(s) of citizen(s) of the United States(s)

The "AMENDMENT(S)" is enforced by Title(s) 42 United States(s) Code(s) §§§ 1981(b), 1983, and 1997 d that:

§ 1981 Equal Rights(s) UNDER THE LAW": (b) Make and Enforce Contract(s) define(s). . . . The purpose of the section and term "MAKE AND ENFORCE" contract(s) include(s) the making, performance, modification, and termination of contract(s), and the enjoyment of all benefit(s), privileges, term(s), and condition(s) of the Contractual Relationship;

§ 1983 DEPRIVATION OF CIVIL RIGHT(S): Every person who(s) under the color of any Statute, Ordinance, Regulation, "~~Custom~~", or Usage of any State, Territory, or District of Columbia subject(s) or cause(s) to subjected to any citizen of the United State(s) or other person(s) within the jurisdiction thereof, to the Deprivation of any Right(s), Privilege(s), or Immunities(s) secured by the Constitution and Law(s) shall be liable to the party injured in an Action at Law; and

§ 1997d PROHIBITION OF RETALIATION(S): No person reporting condition(s) which may constitute a violation under this Act shall be subjected to Retaliation in any manner for so reporting.

These "Provisions" are enforced by Federal "Rules" 15 (b)(2) and 17 (d) of Civil Procedure(s) that provides:

Federal "RULE" 15 (b) of Civil Procedure: "AMENDMENT DURING AND AFTER TRIAL". (2) For Issues(s) Tried by Consent. A party may move - at any time even after judgment to amend the pleading(s) to conform them to the evidence and to raise an unpleaded issue;

Federal "RULE" 17 (d) of Civil Procedure: "PUBLIC OFFICER(S) TITLE AND NAME". A public officer who sues(s) or is sued in an official capacity maybe designated by official title rather than by name, but the court may order that the official/officer(s) name be added.

STATEMENT(S) OF THE CASE

(Pro-Se Petitioner(s)) "ORIGINAL And INITIAL / (1st) AMENDED COMPLAINT"

alleged(s) that he was "FALSELY INSTITUTIONAL CRIMINALLY DISCIPLINARY CHARGE" on August- 5th- 2017 with Offense Code: 137(b) and Offense Title: Indecent Exposure, because (Petitioner) was at work in the Red Onion State Prison Kitchen, and had to use the Kitchen Bathroom to dispose human bodily waste. In which, the "REPORTING EMPLOYEE" - S. M. Sifford "KNOWINGLY FALSELY REPORTED" that (Petitioner) was in the Kitchen Bathroom "UPHOLSTERY COMPLETELY NUDE" standing and looking into her direction. Id. (Preserved from (Petitioner(s)) Appendix ~~F~~).

Furthermore, this "FALSE DISCIPLINARY CHARGE" did instituted (Petitioner) being subjected to the "ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE" from the Virginia Department of Correction(s) "OFFENDER(S) DISCIPLINARY PROCEDURE" # 861.1 and/or # 861.1 R/H. Wherein, the Red Onion State Prison Officer-In-Charge - E. A. Miller authorized it(s) issuance, and Institutional Hearing Officer - Larry A. Mullins(s) refused to process (Petitioner(s)) documentary evidence form and found (Petitioner) guilty, and the Institutional Reviewer - Anne B. Duncan determined that these proper procedure(s) were followed, but Facility Head Unit - Jeff Kiser disapproved and ordered a rehearing because proper procedure(s) was not followed. Id. (Preserved from (Petitioner(s)) Appendix(s) ~~F(1-7)~~).

Howevermore, this "FALSE DISCIPLINARY CHARGE" did constitute (Petitioner(s)) "ORDERED REHEARING" to be subjected to the "ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE" from the Virginia Department of Correction(s) "OFFENDER(S) DISCIPLINARY PROCEDURE" # 861.1 and/or # 862.2 R/H. When, the Red Onion State Prison Officer-In-Charge - J. G. Lyall reauthorized it(s) issuance, and Institutional Hearing Officer - Larry A. Mullins(s) found (Petitioner) guilty again, and Institutional Reviewer -

Anne B. Duncan determined that proper procedure(s) were followed, and Facility Unit Head - Jeff Kiser approved the action(s) of the Hearing Officer falsely reporting that (Petitioner) plead guilty when (Petitioner) was found guilty, and the Virginia Department of Corrections Regional Administrator - Karen Stapleton denied (Petitioner(s)) Appeal Level II because (Petitioner) addressed 12 contention with 3 Contentions on the Contention Form and 9 more on Computer Printed Paper. Id. (Preserved from (Petitioner(s)) Appendixes) G-G(1-9)).
Furthermore, (Petitioner) was thereafter transferred on February-27th-2019 from Red Onion State Prison and to (Petitioner) Ridge State Prison for reason(s) unrelated to this petition. Id.

But upon filing (Petitioner(s)) "TURTAL § 1983 COMPLAINT" on March-22nd-2019, the United States District Court "GRANTED LEAVE TO PROCEED IN-FORMAL PAUPERIS" on or after May-3rd-2019 when (Petitioner) "CONSENTED TO THE FILING FEES", and on June-12th-2019 the Virginia Attorney General Office "NOTED" Counselor - Liza S. Simmons "APPEARANCE" and "WAIVED THE SERVICE OF SUMMONS" for all the defendant(s), et al. Id.

Therefore, on June-26th-2019 the United States District Court received (Petitioner(s)) "TURTAL / (1st) APPENDIX § 1983 COMPLAINT", and on July-1st-2019 "ORDERED THE GRANTING" to amend, and on August-22nd-2019 (Respondent(s), et al.) responded with a "Motion To Dismiss" because (Petitioner) failed to state a claim for relief, in which (Petitioner) immaturity filed a "Motion For Summary Judgment" while under a false impression that he(s) entitled, and not knowing how to state a claim in a "LEGAL Chronological Order" on September-13th-2019. Id.

And as a result of the "CONSENT" to ⁴ United States Magistrate Judge - Pamela Meade Sargent on October-23RD-2019, Magistrate Judge - Pamela Meade Sargent issued (her) "MEMORANDUM OPINION" on March-9TH-2020 for (her) "JUDGMENT" in favor of (Respondent(s), et al.) "GRANTED" "Motion To Dismiss" and "DENYING" (Petitioner(s)) "Motion For Summary JUDGMENT". Id. (Preserved from (Petitioner(s)) Appendixes A(1) - C),

And on March-25TH-2020 (Petitioner) filed a "Motion For Leave To SET ASIDE A DEFAULT JUDGMENT AND CORRECTIONS OF CLEARER MISTAKES IN A FINAL ORDER OR PROCEEDING", and a "Motion To AMEND An AMENDED ³ 1983 COMPLAINT". Id. (Preserved from (Petitioner(s)) Appendix B)

On May-11TH-2020 Magistrate Judge - Pamela Meade Sargent "ORDERED THE DENYING" of (Petitioner(s)) pleading(s); in which on July-24TH-2020 (Petitioner) filed a "Motion For Reconsideration And Motion To AMEND" to conform to the evidence and allege "RETALIATION(S)" by: (1) (Wallen(s) Ridge State Prison Correctional Officer - M. H. Gilley "FALSELY instituting the "ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE" on May-25TH-2020 against (Petitioner) because the officer said (Petitioner) Possessed Intoxicant(s) because (Petitioner) like to file law-suits, and Officer-In-Charge - T. B. Smith authorized the issuance, and Institutional Hearing Officer - H. R. Hensley found (Petitioner) guilty when (Petitioner(s)) (Cellmate and Witness - Brian Butts(s)) claimed ownership, and Institutional Reviewer - J. P. Burgin approved the finding(s) of guilt, and Facility Head Unit - David Zook denied (Petitioner(s)) Appeal Level I; and (2) (Wallen(s) Ridge State Prison Counselor - H. A. Osborne "FALSELY instituting the "ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE" on June-1ST-2020 against (Petitioner) because the counselor said

(Petitioner) Threatened to do Bodily Harm to (her) because (Petitioner) told (her) he was going to write her up because she refused to allow Counselor - C.R. Tiller to copy my original handwritten document(s) and law-suit(s) and habeas corpus, and refused to give them back and not to use these document(s) when (Petitioner) paid \$6.00 for "LEGAL COPIES". Officer-In-Charge - L.A. Light authorized the issuance, Serving Officer - D. Woodard refused to serve (Petitioner) with any Documentary Evidence Form(s), Witness Request Form(s), and Reporting Officer Questioner Form(s), and Institutional Hearing Officer - W.R. Hensley found (Petitioner) guilty, while Institutional Reviewer - J.P. Burgin approved the finding(s) of guilt, and the Facility Head Unit - David Zook denied (Petitioner(s)) Appeal Level I. Id. (Preserved from (Petitioner(s)) Appendix B).

Wherein, on July-27^E-2020 Magistrate Judge - Pamela Meade Sargent "MINUTE ORDER DENYING" (Petitioner(s)) "MOTION FOR RECONSIDERATION And Motion To Amend An AMENDED §1983 COMPLAINT", and as a result, on August-4^E-2020 (Petitioner) "Filed His APPEAL" to the United States District Court, but it didn't get received by the Court(s) until August-18^E-2020 because (Hallens) Ridge State Prison official(s), officer(s), and employee(s) is "HINDERING And DELAYING" (Petitioner(s)) right to appeal. That the United States District Court on August-18^E-2020 Electronically Transmitted "NOTICE OF APPEAL" to the United States 4^E Circuit Court of Appeals. Id. (Preserved from (Petitioner(s)) Appendix C)

Finally, on and after August-19^E-2020 the United States 4^E Circuit Court of Appeals processed to (Petitioner) a: Prisoner Litigation Reform Act Notice of Appeal instructing (Petitioner) of the P.L.R.A. Application, Consent to Collection of Fee(s) from Trust Account,

Prisoner(s) Trust Account Statement for Proceeding 6 Month(s), Change of Address, Motion to Dismiss, Direction(s) for Informal Brief, Informal Briefing Order, Id. (Preserved from "~~PENDING APPEAL~~" in 4th Circuit Court of Appeals) record # 20-7206 As Appendix A). Truly tho, on August-29th-2020 the United States(s) 4th Circuit Court of Appeals "ORDERED" that (Petitioner(s)) "INFORMAL OPENING BRIEF" be filed and due before September-14th-2020 and (Respondent(s), et al.) "INFORMAL REPLY BRIEF" be within 20 Day(s) after the service of the Informal Response Brief. Inwhich, on September-20th-2020 (Petitioner) filed his "INFORMAL BRIEF" and a "EMERGENCY MOTION FOR RETALIATION(S)" pursuant to it(s) United States(s) 4th Circuit Court of Appeals "LOCAL RULE" 27(e) because (Petitioner) is being denied access to his 6 Month(s) Backstatement by (Challenger) Ridge State Prison "BUSINESS OFFICE" - Ms. M. Williams and "COUNSELOR" - Gibson, and because on August-26th-2020 (Petitioner) gave his "OUTGOING LEGAL MAIL" to (Challenger) Ridge State Prison "LEUTENANT" - B. McCray to forward it to the Mailroom and the Mailroom Clerk responded by saying on August-27th-2020 that they haven't received it, Id.

BASIS FOR FEDERAL JURISDICTION(S)

This petition raises(s) "5 QUESTIONS" FOR INTERPRETATIONS OF THE LAW for issue(s) of: (1) Virginia Department of Corrections "EDITED INSTITUTIONAL DISCIPLINARY PROCEDURE"; (2) Prisoner(s) "RIGHT TO PRIVACY" in a inmate bathroom; (3) "FALSE DISCIPLINARY CHARGE(S)"; (4) "ONGOING RETALIATION" because of "MULTIPLE CIVIL PROSECUTION(S)"; and (5) A (pro-se Petitioner(s)) right to "AMEND AN AMENDED § 1983 COMPLAINT AFTER JUDGMENT" inwhich the District Court had "JURISDICTION" by 28 U.S.C. § 1331, and the 4th Circuit

Court of Appeals have it(s) "APPELLANT JURISDICTION" by 28
U.S.C. § 1291.

ARGUMENT(S) IN SUPPORT OF GRANTING CERTIORARI

"Good Day Your HONORABLE CHIEF JUSTICE And/Or JUSTICE(S)"! This is (Pro-
Se Petitioner) - Lorenzo Gerald Ferebee Jr. coming to this Honorable United
State(s) Supreme Court for this "SUPREME COURT(S) INTERPRETATION" for prison(s)
"ENTIRE INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURES" when there(s)
a total absent from this Supreme Court(s) "PRECEDENT(S)" or any Court
opinion or adjudication upon an "ENTIRE INSTITUTIONAL CRIMINAL
DISCIPLINARY PROCEDURE". Id.

Even with the "UPMOST RESPECT" for Pre-Existing Federal Law(s) and Authorities(s),
for "CLEARLY ESTABLISHED FEDERAL LAW", Federal Court(s) have just touched
the "SURFACE" from it(s) pre-existing authorities(s) and laws(s) without
adequately adjudicating the "TOTALITY OF AN ENTIRE INSTITUTIONAL CRIMINAL
DISCIPLINARY PROCEDURE" when Federal and State(s) Department(s) of
Corrections(s) have created an entire institutional disciplinary procedure(s) that
derive(s) from "FEDERAL AND STATE STATUTORY CRIMINAL CODE(S)" for crime(s)
and punishment(s). Id.

Even from within, the "TOUCHING SURFACE" from Federal Court(s) "DE NOVO"
determination(s) upon a prisoner(s) Constitutional, Statutory, and Procedure
"REVIEW" when Federal Court "DE NOVO" determination is to "FACT FIND"
what the law establishes(s) upon a issue before it, and it(s) thereafter
reviewed for "CLARITY" in prisoner(s) "CONDITION(S) OF CONFINEMENT CASE(S)"
and along with "CONSTRUCTION(S)" upon it(s) pleading(s) because of

the "SOCIETY" society and Court(s)' have placed on prisoner(s) from the crime(s) they've committed to incarcerate them in the first place. That each individual or jointly prisoners litigation be "Sanitized" because of a prisoner and/or criminal "CHARACTER AND CREDIBILITY" leave(s) the Court(s)' with the impression that prisoners did a criminal act in Society that landed him or her to imprisonment. Id.

Especially when a prisoners' crime against "SOCIETY" allow government(s) to impose liability factor(s) for "PUNISHMENT AND PENALTY" on that prisoner, that "TURNS THE SCALE" to Constitutional 5th and 14th § 1 "AMENDMENT(S)" under Dent v. West Virginia, at 129 U.S. 114, 123 (1889) and against "ARBITRARY ACTION FROM THE GOVERNMENT" for a prisoner while incarcerated when "FEDERAL AND STATE" Department(s) of Correction(s) are "MAKING AND ENFORCING ENTIRE INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURES" for its(s) prisoner(s) to follow while detained and before being released back into Society so that a prisoner can learn from (his or her) mistake(s) and to deter from crime and criminal activities(s). Id.

In which, Federal and State(s) Department(s) of Correction(s) are "MAKING AND ENFORCING ENTIRE INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURES" for prisoner(s) to follow, in which Federal and State "OFFICIAL(S), OFFICER(S), AND EMPLOYEE(S)" are not following it in order to impose sanction(s) on a prisoner. And (Petitioner) say that to explain this.

Government(s) has "CREATED POLICES AND CUSTOMS" for prisoner(s) to follow and for its(s) official(s), officer(s), staff member(s), and employee(s) to break or "TOTAL DISREGARD" because it only applies to offender(s), inmate(s), prisoner(s), or convict(s), ~~and~~ and Government official(s), officer(s), staff member(s) and/or employee(s) are neither. Id.

Therefore, (Pro-Se Petitioner) seek(s) "CERTIORARI REVIEWING AND GRANTING" by this Honorable United States Supreme Court to resolve these issue(s) of an "ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE" that (Petitioner) was subjected to and from the "INVASION OF (his) PRIVACY" while he was using the Inmate Bathroom in Reel Union State Prison Kitchen and at work. That resulted into (Petitioner) being "FALSELY CHARGED" with a "DISCIPLINARY INFRACTION" for using the inmate bathroom, and eventually being subjected to "ONGOING RETALIATION" ~~because~~ by Wallens Ridge State Prison official(s), officer(s), and/or employee(s) because of this and "MULTIPLE CIVIL PROSECUTION(S)" in Civil Action Number(s): 7:19-cv-00254 (P.M.S.); 7:19-cv-00625 (P.M.S.); 7:19-cv-00629 (P.M.S.); 7:19-cv-00680 (P.M.S.); 7:19-cv-00681 (P.M.S.), and 1:19-cv-01483 (LO/FCB), wherein (Petitioner) wished to have "AMENDED HIS AMENDED 31983 COMPLAINT AFTER JUDGMENT" in 7:19-cv-00254 (P.M.S.) to conform to the evidence, but was denied, Id.

(A) IMPERATIVE PUBLIC IMPORTANCE FROM NORMAL APPLICANT PRACTICES

This Petition for a Writ of Certiorari presented a "SHOWING OF IMPERATIVE" for "PUBLIC IMPORTANCE" while (Petitioner(s)) direct appeal is pending and haven't been adjudicated on it(s) merits by the United States 4th Circuit Court of Appeals, in which the Virginia Department of Corrections "ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE" had been instituted against (Petitioner) on August-5th-2017, May-25th-2020, and June-2nd-2020. Id.

This "SHOWING" is not just limited to (Petitioner(s)) pleading though it(s) bringing light to this Supreme Court for "CERTIORARI REVIEWING", because it(s) effect, is the "PUBLIC INTEREST" for incarcerated persons(s), wherein the

14th § 1 "AMENDMENT" of the United States Constitution "PROTECTS" the government from "MAKING AND ENFORCING" any "Law" which shall abridge the "PRIVILEGES AND/OR IMMUNITIES" of citizens of the United States. Id at 14th § 1 "AMENDMENT".

"And since this petition 'UNQUESTIONABLY INVOLVES OFFICIAL POLICIES' as the 'MOVING FORCE' of these Constitutional Violations founded in the District Court '3rd AMENDED § 1983 COMPLAINT' and 'AFTER 1st AMENDED § 1983 COMPLAINT JUDGMENT', quoting from *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978); And the Virginia Department of Correction "ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE" unexpected and unusual interpretation of its "PLAIN LANGUAGE" in its "PROCEDURE RULES" denies Constitutional Rights," citing *Conner v. Sakai*, 15 F.3d 1463, 1469 (4th Cir. 1993 or 1994). Therefore, "Today has come for this Honorable Court to recognize the ('ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURES') that this principle also applies to any and all Federal, and State, and Territorial Department(s) of Correction(s) government 'POLICY AND CUSTOMS' when implementing its official policies or established customs inflicting Constitutional Injury (on their prisoners)," see at *Monell v. Dep't of Soc. Servs.*, 436 U.S. 708 (1978).

(B) CONFLICT(S) WITH DECISION(S) OF OTHER COURTS

1st POINT

This Honorable United States Supreme Court should intervene into the holdings of the lower courts to clarify the "INVASION OF PRIVACY" interpretation under the United States Constitutional 4th and 8th "AMENDMENTS" from *Hudson v. Palmer*, 468 U.S. 517, 530, 104 S.Ct. 3194 (1994).

Especially wherein this Honorable Supreme Court "Rules" in Hudson v. Palmer at 468 U.S. 517 (1984) that, "A prisoner has "No REASONABLE EXPECTATION OF PRIVACY" in his LIVING QUARTERS under the 4th Amendment "UNREASONABLE SEARCHES AND SEIZURES", because security requires prison officials to "CELL SEARCH FOR CONTRABAND". Id.

In which the Florida Court of Appeals ~~has~~ "CONSTRUED" Hudson at 468 U.S. 517 (1984); by declaring: "A person have "No EXPECTATION OF PRIVACY" in a "TOILET STALL" in a Probation and Restitution Center, pursuant to Cleveland v. State, 557 So.2d 959, 960 (Fla. App. 1990).

With upmost respect for both Courts above, (Petitioner) understand that a person may-not have "No EXPECTATION OF PRIVACY" in those circumstance(s) under Hudson at 468 U.S. 517 (1984) is for Prison Security "CELL SEARCHING FOR CONTRABAND" in a prisoner(s) "LIVING QUARTERS", and under Cleveland at 557 So.2d 959, 960 (Fla. App. 1990) for a Probation and Restitution Center "TOILET STALL", because both Courts properly evaluated circumstance(s) from a "SECURITY STANDPOINT" meaning that, . . . "A prisoner just may hide or try to keep "CONTRABAND HIDDEN" that maybe of a threat to himself or other(s) in his "LIVING QUARTERS" in which Security Purpose is to hinder and prohibit it from occurring or having Id. at 468 U.S. 517 (1984); while also ensuring that "TOILET STALL" be observed by any person of a convicted ~~person~~ ^{crime} to make sure he's or she's not trying give a false urine test to a Probation Officer, Id. at 557 So.2d 959, 960 (Fla. App. 1990).

However, this Honorable Supreme Court needs to resolve this "CONFLICT"

in Lorenza Gerald Ferebee Jr. v. VA. Dep't of Corr., at 7:19-cv-60254 (E.D. Va. 2020) wherein the Virginia Department of Corrections and its Subdivision, Red Onion State Prison, allowed a "Food Service ~~CLEANER~~ - S.M. Sifford to "INVASION (Petitioner's) Privacy" for 15-25 minutes while (Petitioner) was at work, working in Red Onion State Prison Kitchen and had to use the Kitchen Inmate Bathroom to perform normally body function(s) with having to pull down a 1 Piece jumpsuit and boxer(s), and had to take off (his) T-Shirt in order to wash-up himself and clean-up the bathroom once (Petitioner) was finished. Especially wherein, the "INVASION OF Privacy" was not to be intentionally seen ~~by~~ ^{by} (Petitioner) ~~was~~ sitting on the "TOILET" using the Inmate Bathroom that the Bathroom had a "3 Foot CLEAR WINDOW" that could not be covered nor blocked for Security Concern(s) by the Correctional Officer(s) "ORDERS" from their Chief of Security, Id.

The resolution of this "INVASION OF Privacy" truly do need(s) to be resolved by this Honorable Supreme Court, in which the United States 4th and 9th Court of Appeals and United States District Court(s) have all concluded that "SEARCHES" unrelated to Security need(s) support(s) a 4th and 8th Amendment claim for relief to be granted", citing from Tribble v. Gardner, 860 F.2d 321, 325-27 (9th Cir. 1988); Because these "SEARCHES" under "PUNISH AND UNSANITARY CONDITIONS" states(s) a 4th and 8th Amendment claim", quoting from Vaughan v. Ricketts, 859 F.2d 736, 741-42 (9th Cir. 1988); "When it(s) "Not REASONABLE NECESSARY" for the exposure of a prisoner(s) genital(s) to a member of the "OPPOSITE SEX" then that violates his Constitutional Rights)", pursuant to Lee v. Down(s), 641 F.2d 1117, 1119 (4th Cir. 1981); where neither an inadvertent encounter nor a regular

scheduled visit by a female employee at any announced or unannounced time still rise(s) to the level of a Constitutional Deprivation", according to Hudson v. Goodlander, 494 F.Supp. 890, 892 (D. Md. 1980).

Furthermore, this Honorable Supreme Court should re-evaluate its "Ruins" from Hudson v. Palmer, at 468 U.S. 517 and 530 from (1984); to instruct the lower court(s) that a "Prisoner does retain SOME REASONABLE EXPECTATION OF PRIVACY" while incarcerated, outside historical findings(s) from "LIVING QUARTERS", under the 4th Amendment for "UNREASONABLE SEARCHES And SEIZURES" that are unjustified by prison security concerns for misbehavior or misconduct lacking the need to "INVADE THE PRIVACY" of a prisoner for security concerns, because the need of a prisoner(s) "PRIVACY BEING INVADEN" for 15-25 minute(s) by a Food Service Supervisor amounted to "SEXUAL HARASSMENT" under the 8th Amendment for "CRUEL AND UNUSUAL PUNISHMENT" because the "DELIBERATE INTENT" of the government employee to visibly watch a prisoner for 15-25 minute(s) use the Inmate Bathroom the entire time is "UNRELATED TO PERSON NEEDS" wherein a prisoner is just using the bathroom and posing no threat to no one nor him self, and peering at a prisoner for such long period of time to observed the prisoner pull down his 1 Piece jumpsuit, ~~boxer~~ Boxer underwear, remove his T-Shirt, sit down on the "TOILET", wipe his buttocks(s) with toilet-paper 3-5 time(s), stand up from sitting on the "TOILET", wash-up, get dress, and clean-up the in-side and outside of the toilet and wipe off/down the sink all in "15-25 Minute(s)" amount(s) to the intent that (petitioner) was intentionally being watched, looked at, and observed that violate(s) the 4th and 8th Amendment(s) of the United States(s) Constitution. Id.

(c) IMPORTANCE OF THE QUESTION(S) PRESENTED

The "IMPORTANCE OF THE 5 QUESTION(S) PRESENTED" to this Honorable Supreme Court of the United States(s), is for this Court(s) "GRANTING AND REVERSING CERTIORARI" to (Petitioner) while (Petitioner(s)) Direct Appeal from the United States(s) District Court is pending within the United States(s) 4th Circuit Court of Appeals(s), and (Petitioner) is showing a "IMPERATIVE PUBLIC IMPORTANCE" to justify it(s) deviation from "NORMAL APPELLATE PRACTICES(S)", (with respect to the 4th Circuit Court of Appeals(s)), to require an "IMMEDIATE DETERMINATION" by this Honorable Supreme Court, Id. and quoting 28 U.S.C. § 2101 (e) and United States(s) Supreme Court "RULE" 11.

Especially when there(s) a "CONTROVERSY" over the "RIGHT(S) TO PRIVACY", an "FAIRER INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE", and "PRISON RAPE ELIMINATION ACT", "ONGOING RETALIATION(S)", and "PERMITTING TO AMEND AN AMENDED § 1983 COMPLAINT AFTER JUDGMENT" pursuant to 28 U.S.C. § 1251 (a and b(2)) and 1652 (a-b), and according to United States(s) Supreme Court "RULE(S)" 10. (a and c), 12.4, embodied with Federal "RULE" 15 (b)(2) of Civil Procedure(s).

With respect to the "SUMMARIZED ISSUES(S)" in the above 2nd paragraph, this (Petition) "PRESENTS 5 IMPORTANT QUESTIONS" that(s) of "GREATER PUBLIC IMPORTANCE AND INTEREST" that will effect the Prison Operations(s) in all United States(s) of America District(s), States(s), and Territories(s) Jurisdiction(s) and those who subject(s) themselves to the Jurisdiction of the United States(s) of America Department(s) of Corrections(s), Cities(s), Counties(s), and Town(s) jail(s), detention(s), correctional center(s), and

institutions) to hold any person for any crime for or from prosecution. Id.

(Petitioner(s)) "1st QUESTION PRESENT(S)" a showing of "IMPERATIVE PUBLIC IMPORTANCE" for an "ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE POLICY AND CUSTOM" being the "MAYING FORCE" to support the deprivation(s) of (Petitioner(s)) Constitutional Right", according to Monell v. Dep't of Soc. Servs., 436 U.S. 658, 695 (1978). Id.

While (Petitioner(s)) "2nd QUESTION PRESENT(S)" a controversy with (Petitioner(s)) "RIGHT TO PRIVACY" under the 4th and 8th AMENDMENT(S)" of the United States(s) Constitution from Tribble v. Gardner, 860 F.2d 322, 325-27 (9th Cir. 1988), Vaughan v. Ricketts, 859 F.2d 736, 741-42 (9th Cir. 1988), Lee v. Downs, 642 F.2d 1119, 1119 (4th Cir. 1981), and embodied within Hudson v. Goodlander, 494 F.Supp. 890, 892 (D. Md. 1980) in which (Petitioner) pleads with this Honorable Supreme Court to permit "SOME REASONABLE EXPECTATION TO PRIVACY" under the 4th Amendment against "UNREASONABLE SEARCHES" by a Food Service Clerical for 15-25 minutes while (Petitioner) was using the Inmate Bathroom in Red Onion State Prison kitchen that amounts to "SEXUAL HARASSMENT" for the 8th Amendment "CRUEL AND UNUSUAL PUNISHMENT"; wherein this Honorable Supreme Court "QUIES" in Hudson v. Palmer, at 468 U.S. 517 and 530 (1984) should be modified, revised, or extended with (Petitioner(s)) case overruling. Id.

(Petitioner(s)) "3rd QUESTION PRESENT(S)" a controversy with the "USAGE AND PRINCIPLE(S) OF LAW" for "FALSE DISCIPLINARY CHARGE(S)", in which the 8th Circuit Court of Appeals decided in Sprouse v. Babcock, at 870 F.2d 450, 452 (8th Cir. 1989) that, "A prisoner

have "NO ACTIONABLE CLAIM" under §1983 for filing against any "DISCIPLINARY CHARGE".

In which the 5th and 7th Circuit Court of Appeals and United States District Court "TOTALLY DISAGREE(S)" with the 8th Circuit Court of Appeals by opinioning from Foulds v. Courley, at 833 F.2d 52, 54 (5th Cir. 1987) that, "Allegation(s) that "FALSE CHARGE(S)" were brought to compel a prisoner to disclose information about other inmates stated a "DUE PROCESS CLAIM"; Because "Claim(s) of "FALSE AND UNSUBSTANTIATED DISCIPLINARY CHARGE(S)" should not have been dismissed because it amount(s) to a "CLAIM" that there was No Evidence to support the charge(s)", citing Black v. Lane, 22 F.3d 1395 (7th Cir. 1994); While "Allegation(s) that an officer filed "FABRICATED REPORT(S)" to conceal their 8th Amendment Violation(s) stated a claim", seen at Winston v. Coughlin, 789 F.Supp. 118, 120-21 (N.D.N.Y. (1992)); Even another Court recently stated that, "A "DISCIPLINARY HEARING" terminates an officer(s) possible liabilities for filing a "FALSE DISCIPLINARY REPORT",", quoting Hawkins v. O'Leary, 729 F.Supp. 600, 602 (N.D.Ill. 1990), Id.

And (Petitioner(s)) "4th QUESTION PRESENT(S)" a controversy with the "USAGE AND PRINCIPLES OF LAW" for "ONGOING RETALIATIONS", in which this Honorable Supreme Court "Rees" in United States v. Goodwin, at 457 U.S. 368, 2385 (1982) that, "Where an "ACT" that is "DETRIMENTAL" to a plaintiff has been taken after the exercise of a Legal Right, then the presumption of an improper vindictive motive applies only when a Reasonable Likelihood of Vindictiveness Exists".

However, the 1st, 4th, 7th, and 8th Circuit Court(s) of Appeal have all

"COMPARED AND CONTRAST" allegations(s) of "RETALIATION(S)", meaning that, . . . "To STATE A CAUSE OF ACTION for Retaliation under § 1983, a prisoner need to only allege that he exercised his right to Petition for Redressment of Grievance(s) and that his exercise of this right "MOTIVATED PRISON OFFICIAL(S)" to bring "DISCIPLINARY CHARGES(S)" against him," seen at Murphy v. Missouri Dep't of Correction, 769 F.2d 502, 503 (8th Cir. 1985) embodied from McDonald v. Hall, 620 F.2d 26, 28 (1st Cir. 1979); In which "An "Act" in Retaliation for the exercise of a constitutional protected right is actionable . . . , even if the act was taken for a "DIFFERENT REASON" would have been proper," quoting Buisse v. Hudkins, 584 F.2d 223, 229 (7th Cir.), because "DIRECT EVIDENCE" of Retaliation rarely can be pleaded in a Complaint, but allegations(s) of a "CHRONOLOGY OF EVENTS" from Retaliation(s) can be sufficient to survive any dismissal, according to both, Murphy v. Lane, 833 F.2d 106, 108-09 (7th Cir. 1987) and Benson v. Cady, 761 F.2d 335, 342 (7th Cir. 1985); While a Retaliation Claim under § 1983 consist of three element(s), such as . . . (1) The plaintiff must have engaged in a Constitutionally Protected 1st Amendment activity, (2) The defendant took an action that Adversely Affected that Protected Activity, and (3) There(s) a Causal Relationship between the plaintiff(s) protected activity and the defendant(s) conduct", quoting both Booker v. S.C. Dep't of Corr., at 855 F.3d 533, 2017 U.S. App. LEXIS 5 (4th Cir. 2017) and Martin v. Duffy, 858 F.3d 239, 2017 U.S. App. LEXIS 18, 19, 20 (4th Cir. 2017) and Constantine v. Rector(s) & Visitor(s) of George Mason Univ., 411 F.3d 474, 499 (4th Cir. 2005).

Furthermore, the 2nd, 3rd, 5th, 6th, 9th, 12th, and D.C. Circuit(s)

Court of Appeal(s) has stated, "An allegation that a prison official filed "FALSE DISCIPLINARY CHARGES" in retaliation for the exercise of a Constitutional Protected Right, (such as) Filing of a grievance, Stat(s) a Claim under § 1983", seen at both Franco v. Kelly, 854 F.2d 584, 589 (2nd Cir. 1988) embodied in Gayle v. Gonyea, 313 F.3d 677, 682 (2nd 2002); While "Inmate(s)' allegation that he was "FAISELY CHARGED" with misconduct in Retaliation(s) for filing a complaint against Officer - Wilson implicates conduct that was protected by the 1st Amendment", quoting Mitchell v. Horn, 318 F.3d 523, 530 (3rd Cir. 2003); In which "Court(s) recognize(s) the 1st Amendment as a "Retaliation Right"", citing Bibbs v. Early, 541 F.3d 267, 272 (5th Cir. 2008), with Hines v. Gomez, 208 F.3d 265, 269 (9th Cir. 1997), and Boxer X v. Harris, 437 F.3d 1107, 1112 (11th Cir. 2006), an Heron v. Harrison, 203 F.3d 410, 414 (6th Cir. 2000).

Truly, neither have this Supreme Court or any Circuit Appellant Court delt with an "ONGOING RETALIATION" allegation, wherein (Petitioner) in this present case received "2 FALSE DISCIPLINARY CHARGES": On May-25th - 2020 for Possession of Intoxicant when (Petitioner's) Cellmate - Brian Butte(s) "ADMITTED" to it(s) possession throughout (Petitioner's) "ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE" and (Petitioner) still was issued charge(s), found guilty, and denied his appeal(s); and On June-1st - 2020 for Threatening to do Bodily Harm because (Petitioner) told Counselor - H.A. Osborne he was going to write her up because she told Counselor - C.R. Tiller to not give me back my Legal Work nor make copie(s) of it in which (Petitioner) paid \$ 6.00 for Legal Copie(s) and she refused to notrized my Legal Work, because (she)

said (she) wasn't going to help (Petitioner) file Law Suits against the prison, and as a result, (Petitioner) was removed from General Population on June-1st-2020 and placed into Segregation until June-12th, 13th, 14th, or 15th-2020. Id at 42 U.S.C. § 1997d

Also, neither has this Supreme Court or any Circuit Appellant Court adjudicated an "ONGOING RETALIATION" allegation wherein (Petitioner) filed legal mail to the United States District Court on August-26th-2020 and (Petitioner) had to give it to a prison official - B. McCray to sign the "POSTAGE RETURNED FORM" in order for the legal mail to be processed, but (Fallen(s) Ridge State Prison "Mailroom" responded to a "REQUEST FORM" that it did not receive it. Id. at 42 U.S.C. § 1997d

Nor have this Supreme Court or any Circuit Appellant Court addressed an "ONGOING RETALIATION" claim where (Fallen(s) Ridge State Prison "BUSINESS OFFICE CLERK" - M. Williams and "COUNSELOR" - Gibson has refused to disclose and retrieve (Petitioner(s)) 6 Month(s) Backstatement(s) because on the 4th Circuit Court of Appeals "ORDER" states if (Petitioner) don't submit his 6 Month(s) Backstatement for filing Informa Pauperis, then his Appeal will be "Dismiss For Failure To Prosecute", in which (Petitioner) was thereafter forced to file his appeal under "Good Faith" and along with a "EMERGENCY MOTION FOR RETALIATION" because (he) can't retrieve his 6 Month Backstatement(s). Id. at 42 U.S.C. § 1997d

And this Supreme Court nor any Circuit Appellant Court reviewed a "ONGOING RETALIATION" claim when (Fallen(s) Ridge State Prison "GRIEVANCE OMBUDSMAN" - B.J. Revizee Admitted to intentionally

"TARGETING" (Petitioner) for filing grievance(s) and Law-Suits against her in ongoing civil action # 7:19-cv-00629, by (her) admitting to "NARRATIVE" Wallens Ridge State Prison "BUILDING UNIT MANAGER" - J. Carico and "TENANT" - B. McCray that (he / Petitioner) wrote them up because J. Carico would not give (Petitioner) a Informal Complaint to write up B. McCray not turning in his Outgoing Legal Mail on August-26th-2020. In which, (Petitioner) is "MAIL EXHAUSTING" his institutional remedies through the grievance procedure in order to sue B.J. Revizee again when B. McCray threaten to do (Petitioner) harm day(s) after for writing him up. Id. at 42 U.S.C. § 1998

These "ONGOING RETALIATION(S)" and a lot of it(s) document(s) are in the United States 4th Circuit Court of Appeal(s) record # 20-7206 upon (Petitioner(s)) "EMERGENCY MOTION FOR RETALIATION(S)" that just maybe needed to be sent to this Honorable Supreme Court for it(s) "FACT FINDING". Id.

Finally, (Petitioner(s)) "5th QUESTION PRESENT(S)" a controversy with the "USAGE AND PRINCIPLE(S) OF LAW" for "AMENDING AN AMENDED § 1983 COMPLAINT AFTER JUDGMENT" on the issue, in which the United States District Court on May-11th-2020 and July-27th-2020 "REFUSE(S)" to allow (Petitioner) to "AMEND (HIS) AMENDED § 1983 COMPLAINT" pursuant to Federal "RULE" 15(b)(2) of Civil Procedure(s) when the District Court on March-9th-2020 "MEMORANDUM OPINION" declared (Plaintiff / Petitioner) present(s) 7 equal "FAILURE TO STATE A CLAIM FOR RELIEF" issue(s) for Due Process, Equal Protection(s), and Retaliation(s).

There(s) a "LACK OF SUPREME COURT PRECEDENT" for permitting a (Petitioner) to "AMEND" an "AMENDED § 1983 COMPLAINT AFTER JUDGMENT" on a

issue in which the District Court in this present case is in controversy with both . . . Meitzke v. Williams, 490 U.S. 329, 329, 209 S.Ct. 1827 (1989) when the Supreme Court "Ruled" that a (Petitioner) with a "ARGUABLE CLAIM" be permitted to "AMEND" his complaint before a "Motion To Dismiss" is ruled on"; Especially when it(s) upheld that when a (Petitioner(s)) (1st Amended Complaint) was "DISMISSED FOR INADEQUATE PLEADING" under I qbal, then that point after, (he) should have the option to "AMEND His COMPLAINT OR APPEAL THE JUDGMENT", quoting Moss v. Secret Services, 572 F.3d 962, 965 (9th Cir. 2009). Id.

This controversy with the lower court should be reviewed and remanded with instruction(s) for allowing (Petitioner) to "AMEND (His) AMENDED § 1983 COMPLAINT" in order for (Petitioner) to present however many "CLAIM(S) FOR RELIEF" against any and all defendant(s), et al., that(s) in violation of (Petitioner(s)) Constitutional Right(s) before and while this process is "ONGOING". Id.

(D). FEDERAL PROSPECTIVE RELIEF And RETROSPECTIVE RELIEF

(Prouse Petitioner) respectfully plead with this Honorable Supreme Court to "LIBERALLY CONSTRUCT" this (Petition) so as to do justice", citing both Hughes v. Rowe, 449 U.S. 5, 9-20 (1980) and Federal "Rule" 8(e) of Civil Procedure; Because "LIBERAL CONSTRUCTION(S) OF PLEADING(S)" by a (Prisoner) is particularly appropriate where as in here from this present case, where a (Petitioner) is raising "CIVIL RIGHT ISSUES", "quoting Smith v. Smith, 589 F.3d 735, 738 (4th Cir. 2009).

Especially when (Petitioner) pleads for both "PROSPECTIVE RELIEF And RETROSPECTIVE RELIEF" implicating (1st, 4th, 8th, and 14th §1 "AMENDMENT(S)") concerns because Federal [r]emedies have been designed to end a "CONTINUING" violation of Federal Law that(s) necessary to vindicate the Federal Interest in assuring the "SUPREMACY OF THE LAW(S)", (for Granting "CERTIORARI" Review)", according to Green v. Mansour, 474 U.S. 64, 68 (1985). Id.

In which this Supreme Court(s) "ORIGINAL JURISDICTION" under 28 U.S.C. § 1252 (a and b(2)); Allows this Supreme Court to determine any showing of "IMPERATIVE PUBLIC IMPORTANCE" to justify the deviation from "NORMAL APPELLATE PRACTICE(S)" to "GRANT CERTIORARI REVIEW", pursuant to both, 28 U.S.C. § 2102 (e) and United States(s) Supreme Court "RULE" 11.; Because the "5 IMPORTANT QUESTION(S) OF FEDERAL LAW(S)", have or have not been, "ADEQUATELY DETERMINED" by a settled "RULING" by this Supreme Court, according to United States(s) Supreme Court "RULE" 10. (c); Wherein the "USAGE AND POINTLESS OF LAW" for an "ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE" Policy And Custom", "INVASION OF PRIVACY", "SEXUAL HARASSMENT", "FALSE DISCIPLINARY CHARGE(S)", "ONGOING RETALIATION(S)", and "AMENDING An AMENDED §1983 COMPLAINT AFTER JUDGMENT" from the interpretations by this Court(s) Chief Justice and Justice(s) for its lower court(s) will "ADD TWO RESPECTIVE JURISDICTION", quoting 28 U.S.C. § 1252 (a and b(2)); In which two or more judgment are sought to be review by a single "HOP OF CERTIORARI", quoting from United States(s) Supreme Court "RULE" 12.4. Id.

Where the United States(s) Constitutional 14th §1 "AMENDMENT" and

Title 42 U.S.C. § 1982(b) both mirror each other to mean.

"No State shall MAKE AND ENFORCE" any law that shall abridge the privilege(s) or immunity(s) of citizen(s), to contract(s) including the making, performance, modification, and termination of the contract as well as the enjoyment of all benefit(s), privilege(s), term(s) and condition(s) of the Contractual Relationship. Id.

That term(s) the "SAFE TAKEN" onto the Virginia Department of Correction(s) "PRISON RAPE ELIMINATION ACT", # 038.3 § III. "VOWENISM" (By A STRAENDER) stating that: "An invasion of privacy of an offender by staff for reason(s) unrelated to official duties(s), (such as), peering at an offender who's using a toilet to perform bodily function(s) and requiring (him) to expose his buttocks(s), genital(s), or breasts(s). (Preserved from (Petitioner(s)) Appendix E on its page # 17-18 from the Virginia Department of Correction O.P. # 038.32. Id.

In order to "TIE TOGETHER" the Virginia Department of Correction(s) "OFFENDER(S) DISCIPLINARY", # 861.1 and # 861.1 R/H § V "CODE OF OFFENSE(S)" A. Category I Offense(s) meaning that. . . These offense(s) are stated by "CODE(S) AND TITLE(S)", in which:

- (1) "OFFENSE CODE" : 137. (b). "OFFENSE TITLE" : Indecent Exposure (nude(s)), Indecent Exposure is any Nudity in "PUBLIC OR INTENTIONAL EXPOSURE" of intimate part(s) when such exposure of flesh is likely to be observed by a Non-Consenting Person(s).

While Indecent Exposure "DOES NOT APPLY" to the accidental observation of Nudity at such time and place where the offender would "NOT REASONABLY EXPECT" to be observed as required for, but not limited to, "MEDICAL

(she) was pulling "Dinner Crawl" (she) seen (Petitioner) in the "OFFENSE(S) Bathroom" completely nude, standing in the window, and looking into (her) direction". Id.

(4) (A). Induch on August-5th-2017, "OFFICER IN CHARGE" - E. A. Miller approved "MADE AND ENFORCED" this "FALSE DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 137 (b) and "OFFENSE TITLE": Indecent Exposure when (he) used the Virginia Department of Corrections "OPERATING PROCEDURE" # 862.1 and for # 862.1 R/H § X (A) (1) to "Authorize" the service of this "FALSE DISCIPLINARY OFFENSE REPORT" Without Investigating the Entire Situation as Appropriate that included interviewing the accused offender (Petitioner), Reporting Officer, and/or any relevant witness to determine if "SUFFICIENT INFORMATION" exist". Id.

(4) (B). And when (Petitioner) went to his Disciplinary Hearing on August-15th-2017, "INSTITUTIONAL HEARING OFFICER" - Larry A. Mullins "MADE AND ENFORCED" the "FINDING(S) OF GUILTY" from this "FALSE DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 137 (b) and "OFFENSE TITLE": Indecent Exposure when (he) used the Virginia Department of Corrections "OPERATING PROCEDURE" # 862.1 and/or # 862.1 R/H § IV (A) (1-2) ~~to find~~ to find (Petitioner) guilty based on "INSUFFICIENT EVIDENCE" from the "PERPONDANCE OF EVIDENCE" presented at the hearing, and by "ADDITIONS" that (he) will not process any "DOCUMENTARY EVIDENCE FORM(S)" for (Petitioner), because (Petitioner) was seen "VISTRY THROUGH THE WINDOW". Id.

(4) (C). An on August-16th-2017, "INSTITUTIONAL REVIEW" - Annee B. Duncan approved "MADE AND ENFORCED" the "FINDING(S) OF GUILTY" for this "FALSE DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 137 (b)

and "OFFENSE TITLE": Indecent Exposure when (she) used the Virginia Department of Correction(s) "OPERATING PROCEDURE" # 861.1 and/or # 861.1 R/H § XVI (A-B) when (she) approved within "20 Days" that proper procedures were followed. Id

(4) (D). In which, on or after August-26th-2017 "Facility Unit Head" - Jeff Kisor "ORDERED A REHEARING" from the "FINDING OF GUILTY AND INSTITUTIONAL REVIEWED" from this "FALSE DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 137(b) and "OFFENSE TITLE": Indecent Exposure when (he) use the "MAKING AND ENFORCEMENT" of the Virginia Department of Correction(s) "OPERATING PROCEDURE" # 861.1 and/or # 861.1 R/H § XVIII (E), (8), (d), when (he) "Found Procedural Error". Id.

(4) (E). Wherein, on September-8th-2017, "OFFICER-IN-CHARGE" - J.G. Lyall "MADE AND ENFORCED" the "REAUTHORIZATION" of this "FALSE DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 137(b) and "OFFENSE TITLE": Indecent Exposure from using Virginia Department of Correction(s) "OPERATING PROCEDURE" # 861.1 and/or # 861.1 R/H § ~~X~~ (A) (1) without Investigating the Entire Situation as Appropriate that included interviewing the accused offender (Petitioner, Reporting Officer, and/or any Relevant Witness to determine if "SUFFICIENT INFORMATION" exist". Id

(4) (F). Thereafter, on September-15th-2017, "INSTITUTIONAL HEARING OFFICER" - Larry A. Mullins(s) "MADE AND ENFORCE" the "FINDING(S) OF GUILTY" once again for the "FALSE DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 137(b) and "OFFENSE TITLE": Indecent Exposure by using Virginia Department of Correction(s) "OPERATING PROCEDURE" # 861.1 and/or # 861.1 R/H § IV (A) (1-2) when he "ADMITTED" that: "(Petitioner) in his own testimony

stated that prisoner(s) had a "Bathroom Window" that could not be covered and when he "Stood Up From Sitting On The Toilet" S.M. Sifford was looking at him". Id.

(4) (6). An-again, on September-20th-2017 "INSTITUTIONAL REVIEWED" - Anne B. Duncan approval "MADE AND ENFORCED" the "FINDING(S) OF GUILT" of this "FALSE DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 137 (b) and "OFFENSE TITLE": Indecent Exposure when (she) used the Virginia Department of Corrections "OPERATING PROCEDURE" # 861.1 and/or #861.1 RH § XVI. (A-B) by approving within "20 DAYS" that proper procedure(s) were followed. Id.

(4) (4). An, on October-6th-2017 "FACILITY ~~MAN~~ HEAD" - Jeff Kiser denied Appeal Level I when (he) "MADE AND ENFORCED" his "MEMORANDUM" for this "FALSE DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 137 (b) and "OFFENSE TITLE": Indecent Exposure when (he) used the Virginia Department of Corrections "OPERATING PROCEDURE" # 861.1 and/or 861.1 RH § ~~XVII~~ (B) and (E)(7) because (he) stated that (Petitioner) "PLEAD GUILTY". Id.

(4) (1). So when (Petitioner) tried to Appeal Level I Respond to Appeal Level II because (Petitioner) "DID NOT PLEAD GUILTY", on November-7th-2017 "OFFENDING DISCIPLINARY MANAGER" - Karen Stapleton responded by saying: "(Her) office has received (Petitioner's)" "APPEAL", and loose leaf or notebook paper will not be accepted, but (Petitioner) may "RESUBMIT" his "APPEAL" outside the normal timeframe for this case, because attached is a current "DISCIPLINARY APPEAL FORM";

And on December-21st-2017 "OFFENDING DISCIPLINARY MANAGER" - Karen Stapleton "MADE AND ENFORCED" (her) "UPHELDMENT WITHOUT FURTHER REVIEW" for this "FALSE DISCIPLINARY CHARGE" against (Petitioner) for

"OFFENSE CODE": 237 (b) and "OFFENSE TITLE": Indecent Exposure when (she) "INADEQUATELY" used the Virginia Department of Corrections' "OPERATING PROCEDURE" # 862.2 § XXI, and by stating: "Rather than follow my sample instruction(s), (Petitioner) chose to "RE-SUBMIT" his appeal with 22 contentions(s) a 2nd time, with all but 3 contentions(s) on the Appeal Form, written on "PRINTER PAPER". Id.

(5) On May-25th-2020, "REPORTING OFFICER" - M. H. Gilley "MADE AND ENFORCED" (his) "FALSE RETALIATORY DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 242 (a) and "OFFENSE TITLE": Possession of Intoxicants when (he) used the Virginia Department of Corrections' "OPERATING PROCEDURE" # 862.2 RH § IX. (A)(1), (C)(1-13), and (D)(1) by "FALSIFY SUBMITTING" a Retaliatory Disciplinary Offense Report on (Petitioner) from him having "REASONABLE CAUSE" from the conversation (him and Petitioner) had about (Petitioner) filing law-suits that (he) was going to write (Petitioner) this charge while "KNOWING" . . . (Petitioner's) Witness and Cellmate - Brian Butts "ADMITTED" that the Intoxicants was (his) and "Not" (Petitioner's). Id.

(5) (A). In which, on May-25th-2020 "OFFICER-IN-CHARGE" - T. B. Smith "AUTHORIZED" the "MAKING AND ENFORCEMENT" of this "FALSE RETALIATORY DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 242 (a) and "OFFENSE TITLE": Possession of Intoxicants when (he) used the Virginia Department of Corrections' "OPERATING PROCEDURE" # 862.2 RH § IX. (A)(1) without investigating the Entire Situation as Appropriate that includes) interviewing (Petitioner), the Reporting Officer, and any relevant witness or witnesses(s) - Brian Butts, Lorenza Jones, and G. Cabler to determine if "SUFFICIENT INFORMATION EXIST". Id.

- (5) (B). And on or after June - 3rd - 2020 "INSTITUTIONAL HEARING OFFICER" -
M. R. Hensley "MADE AND ENFORCED" the "FINDING(S) OF GUILT" from
this "FALSE RETALIATORY DISCIPLINARY CHARGE" against (Petitioner) for
"OFFENSE CODE": 242(a) and "OFFENSE TITLE": Possession of Intoxicant(s)
when (he) used Virginia Department of Correction(s) "OPERATING PROCEDURE"
862.2 R.H. § IV. (A) (1-2) to find (Petitioner) guilty based on "INSUFFICIENT
EVIDENCE" from the "PERPENDANCE OF EVIDENCE" when (he) determined
that, "From the "CONVERSATION" (Petitioner and Officer - M. J. Gilley) had
then (Petitioner) is guilty. Id.
- (5) (C). Then on or after June - 3rd - 2020, "INSTITUTIONAL REVIEWER" - J. P. Burgin
"APPROVAL MADE AND ENFORCE" the "FINDING(S) OF GUILT" from this
"FALSE RETALIATORY DISCIPLINARY CHARGE" against (Petitioner) for
"OFFENSE CODE": 242(a) and "OFFENSE TITLE": Possession of Intoxicant(s)
when (he) used Virginia Department of Correction(s) "OPERATING PROCEDURE"
862.2 R.H. § XVI (A-B) when (he) approved within "20 DAY(S)" that
proper procedure(s) were followed. Id.
- (5) (D). An on or after June - 9th - 2020 "FACILITY UNIT HEAD" - David
Zook "DENIED" Appeal Level I when he "MADE AND ENFORCE" his
"MEMORANDUM" for this "FALSE RETALIATORY DISCIPLINARY CHARGE" against
(Petitioner) for "OFFENSE CODE": 242(a) and "OFFENSE TITLE":
Possession of Intoxicant(s) when (he) used the Virginia Department of
Correction(s) "OPERATING PROCEDURE" # 862.2 R.H. § XVII. (E) (1 and 2)
when (he) determined that no serious procedural error has occurred. Id.
- (6). On June - 2nd - 2020, "REPORTING OFFICER" - H. A. Osborne "MADE AND
ENFORCED" (her) "FALSE RETALIATORY DISCIPLINARY CHARGE" against

(Petitioner) for "OFFENSE CODE": 212 and "OFFENSE TITLE": Threatening Bodily Harm to any Person when (she) used the Virginia Department of Correction(s) "OPERATING PROCEDURE" # 862.1 RH³ IX, (A)(1), (C)(1-23), and (D)(1) by "FALSELY SUBMITTED" a Retaliation Disciplinary Offense Report on (Petitioner) because (she) believed that (she) had "REASONABLE CAUSE" because (Petitioner) needed (his) Counselor - C.R. Tiller to copy, notarize, and give back to (Petitioner) his "LEGAL WORK" when (Petitioner) filled out and a Money Withdrawal Form to have \$ 6.00 deducted from his Inmate account for "LEGAL COSTS" and (she) = Counselor H.A. Osborne intervened by saying (Petitioner) will not be getting his "LEGAL WORK" back because their not going to help (him) file "LAW SUITS" against the prison, Id.

(6) (A). In which, on June-1st-2020 "OFFICER-IN-CHARGE" - L.A. Light "AUTHORIZED" the "MAKING AND ENFORCEMENT" of this "FALSE RETALIATION DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 212 and "OFFENSE TITLE": Threatening Bodily Harm to any Person when (he) used the Virginia Department of Correction(s) "OPERATING PROCEDURE" # 862.1 RH³ IX, (A)(1) without Investigating the Entire Situation as Appropriate that included interviewing (Petitioner), the Reporting Officer, and relevant Witness - Robert Burns(s) to determine if "SUFFICIENT" INFORMATION EXIST". Id.

(6) (B). An, on June-1st-2020 "SERVING OFFICER" - D. Woodard "SERVED" of this "FALSE RETALIATION DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 212 and "OFFENSE TITLE": Threatening Bodily Harm to any Person was "MADE AND ENFORCED" by the Virginia Department of Correction(s) "OPERATING PROCEDURE" # 862.1 RH³

XI. (B)(1)(b) and (B)(7) because (he) did not give (Petitioner) upon the "SERVICE OF THE CHARGE" no Reporting Officer Form(s), Witness Request Form(s), and Documentary Evidence Form(s) in which (Petitioner) refused to sign the Retaliation Disciplinary Offense Report because these "Forms" WASN'T PROVIDED". Id.

(6) (C). And on June-9th-2020 "INSTITUTIONAL HEARING OFFICER" - H. R. Hensley "MADE AND ENFORCED" the "FINDING OF GUILT" from this "FALSE RETALIATION DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 212 and "OFFENSE TITLE": Threatening Bodily Harm to any Person when (he) used the Virginia Department of Corrections "OPERATING PROCEDURE" # 862.2 R/H § IV. (A)(1-2) and "INSUFFICIENT EVIDENCE" within the Retaliation Disciplinary Offense Report establishes the "PERFORMANCE OF EVIDENCE" that any false statement to do Bodily Harm to her because day(s) before I told her I was going to write her up. Id.

(6) (D). Then again, on June-9th or 10th, or 12th-2020 "INSTITUTIONAL REVIEWER" - J. P. Burgin "APPROVAL MADE AND ENFORCED" the "FINDING(S) OF GUILT" from this "FALSE RETALIATION DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 212 and "OFFENSE TITLE": Threatening Bodily Harm to any Person when (he) used the Virginia Department of Corrections "OPERATING PROCEDURE" # 862.1 R/H § XVI. (A-C), because (he) approved within "20 DAYS" that proper procedures were followed and it wasn't. Id.

(6) (E). And, on June-16th-2020 "FACILITY UNIT HEAD" - David Zook "DENIED" Appeal Level I when he "MADE AND ENFORCED" his

"MEMORANDUM" for this "FALSE RETALIATORY DISCIPLINARY CHARGE" against (Petitioner) for "OFFENSE CODE": 212 and "OFFENSE TITLE": Threatening Bodily Harm to any Person when (he) used the Virginia Department of Correction(s) "OPERATING PROCEDURE" # 862.2 R/H § XVIII (E) (2 and 7) when (he) determined that sufficient evidence was presented to support the finding(s) of guilt. Id.

Furthermore and without "STATE TRACKING" this Honorable Supreme Court from the "SAME TOKEN", when on one side (Petitioner) was issued a "False DISCIPLINARY CHARGE" by Red Onion State Prison "Food Service CLEVELAND" - S.M. Sifford on August-5th-2027, and on the other side (Petitioner) was issued 2 "More FALSE RETALIATORY DISCIPLINARY CHARGES" by Wallens Ridge State Prison "CORRECTIONAL OFFICER" - M.W. Gilley on May-25th-2020 and Wallens Ridge State Prison "COUNSELOR" - H.A. Osborne on June-2nd-2020. Id. pursuant to 42 U.S.C. § 1997 d.

Wherein this "SAME TOKEN ELEMENT" above establishes the "TIEING TOGETHER" of the Virginia Department of Correction(s) "FURTHER INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE POLICY AND CUSTOMS" from different places(s), persons(s), dates(s), and situation(s) that ~~shows~~ Shows(s) and Proves; ("The "ACTUAL KNOWLEDGE AND AWARENESS" on part of each "INDIVIDUAL PRISON OFFICIAL" that(s) essential to the "MAKING AND ENFORCEMENT" of the government(s) "POLICY AND CUSTOMS"; quoting from *Brice v. VA, Beach Corr. Ctr.*, 58 F.3d 202, 205 (4th Cir. 1995)). Id.

Because, "LIABILITY" in any Civil Rights action on a case by case, is based on each "INDIVIDUAL OFFICIAL" own Constitution Violation,

citing Trublock v. Frech, 285 F.3d 392, 402 (4th Cir. 2001);
When, "A "CAUSE OF ACTION" for damage(s) under any ("~~FEDERAL~~
STATUTORY CODE(S) AND SUBSECTION") can be maintained against "GOVERNMENT
OFFICIAL(S) AND EMPLOYEE(S)" acting in their "OFFICIAL CAPACITY",
seen from Raffety v. Prince George County, 423 F.Supp.
1045 (D.C. Md. 1976); Which, "This "BAN REMAINS" in-effect when
State Official(s) are sued for "DAMAGE(S)" in their Official Capacity";
see Cory v. White, 457 U.S. 85, 90 (1982); Because "The 24th §
1 "AMENDMENT" and "STATUTORY" Code § 1981 (b) involve(s) the "MAKING
AND ENFORCEMENT" of privilege(s), immunity(s), performance, modification,
benefit(s), term(s), and condition(s) while "STATUTORY" Code § 1983
involve(s) "POLICY AND/OR CUSTOMS". So even permitting the "COMPARED
AND CONTRAST ELEMENT(S)" of Federal Constitution and Statutory
"PROVISION(S)" is the "MAKING AND ENFORCEMENT OF POLICY(S) AND
CUSTOMS", Id.

To understand that more is required in any "OFFICIAL CAPACITY ACTION"
for (the Virginia Department of Correction(s)) to be held liable
under §§ 1981 (b) and 1983 because it(s) just when it(s) "ENTRY"
is the "MOVING FORCE" behind (Petitioner(s)) Constitutional deprivations,
seen from Polk County v. Dodson, 454 U.S. 322, 326 (1981);
When it(s) "ENTRY POLICY AND CUSTOMS" are the supporting factor(s)
that have play'd a part into the violation(s) of Federal Law(s),
citing Monell v. N.Y. City Dep't of Soc. Serv., at 436 U.S.
658, 692 (1978); And the Department(s) official(s), officer(s), and
employee(s) are, "EXECUTING OFFICIAL GOVERNMENTAL POLICY" by
"ENFORCING THE CUSTOMS", quoting from Int'l Ground Transp.
Inc. v. Mayor & City Council of Ocean City Md., 475
F.3d 224, 222 (4th Cir. 2007).

And since this (Petitioner) "UNQUESTIONABLY" involved the (Virginia Department of Corrections) "ENTIRE INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE" as the Moving Force of the Constitutional Violation(s) Founded in the (United States) 4th Circuit Court of Appeal pending Appeal) from the Western District Court, then this Supreme Court should, "RESPECTFULLY", grant "RETRIBUTION", Id at Monell, 436 U.S. 655 (1978). Id.

Especially when it sum(s)-up "PRE-EXISTING" Supreme Court "PRECEDENTS" from Wolff v. McDonnell at 418 U.S. 539 (1974) Minimum Procedure Requirement(s); Superintendent, Massachusetts Correctional Institution v. Hill at 472 U.S. 445 (1985) Some Evidence Requirement(s); Hewitt v. Helms at 459 U.S. 470-72 (1983) Mandatory Language; Sandin v. Conner at 525 U.S. 472 (1995) Atypical and Significant Hardship; and Turner v. Safley at 482 U.S. 90 (1987) Governmental Objective must be Legitimate and Neutral, Reasonableness of Prison Regulation, the Impact of Accommodation and Allocation of Prison Resource(s), and Alternative(s) of Reasonableness of Prison Regulation or Exaggerated Response(s) to prison concern. Id.

Faced with this Supreme Court(s) "PRECEDENTING(S)" from its) interpretation(s) of the 14th § 1 and 1st "AMENDMENT(S)" of the United States Constitution for "DUE PROCESS AND REGULATION", should "GRANT CERTIORARI" when (Petitioner) seeking "PROSPECTIVE RELIEF AND RETROSPECTIVE RELIEF" from this Honorable Supreme Court to shift the burden of "POLICE AND CUSTOM(S)" to the "MAKING AND ENFORCEMENT(S)" of any "ENTIRE INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE" under the 14th § 1 "AMENDMENT" of the United States Constitution and under "COGNIZABLE STATUTE(S)" §§ 1981 (b) and 1983. Id.

"Because State law required that "Notice Of Sanctions" be given before any offense is committed", quoting Bryan v. Dep't of Corrections, 258 N.J. Super. 546, 620 A.2d 889, 892 (N.J. Super. A.D. 1992); When in Virginia; "It(s) rules is required that prisoner(s) "OBEY POLICE(s)", citing Gibbs v. King, 779 F.2d 1040, 1045 (5th Cir. 1986); And it(s) controversy when the Virginia Department of Corrections) "ENTERED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE CUSTOMS" of it(s) "ENTERED DISCIPLINARY POLICY" is being executed in Constitutional Deprivation(s) "STATEWIDE" from the showing of factual predicates(s) within this petition, that must be observed that Virginia "PRISON OFFICIALS" have set up it(s) "ENTERED DISCIPLINARY POLICY" and then shot down it(s) "ENTERED DISCIPLINARY CUSTOM" in every conceivable way. Id.

Even when, the Virginia Department of Corrections) "MADE AND ENFORCED" it(s) "OPERATING PROCEDURE" # 038.3 § III for "VOYEURISM BY A STAFFMEMBER" to define: "INVASION OF A PRISONER(S) PRIVACY" by a staffmember for "REASONS UNRELATED" to that staff official(s) duties) when peering at a (Prisoner) while using the "TOILET" to perform bodily function(s) and required that (Prisoner) to ~~to~~ "EXPOSE HIMSELF". Id

Is still within it(s)self controversy when Food Service Supervisor - S.M. Sifford "ADMITTED" that she was doing exactly that to (Petitioner) and (Petitioner) was institutionally sanctioned for using the "TOILET". Id.

And what make matter(s) worse, is while this "ONGOING LITIGATION" been proceeding (Petitioner) received 1 More Institutional Sanctions) because of this "ONGOING PROSECUTION" when Correctional Officer -

M. H. Gilley "ADMITTED" that (him and Petitioner) had a conversation, and (he) ~~misrepresented~~ falsely reported that (Petitioner) admitted to possessing intoxicant(s), knowing the conversation was about "FILING LAWS SUITS(s)" and Brian Butts "ADMITTED" that the intoxicant(s) was his and not (Petitioner(s)) to the officer and at (Petitioner(s)) Disciplinary Hearing. Id. pursuant to 42 U.S.C. § 1997d

And if it couldn't get worse than that, then while this "ONGOING LITIGATION" been forthcoming (Petitioner) received a 2nd Institutional Sanction because of this "ONGOING PROSECUTION" when Counselor - H. A. Osborne "ADMITTED" that (she) wrote (Petitioner) a Disciplinary Infraction because of (Petitioner(s)) concern for his "LEGAL DOCUMENTS". And regardless of the dispute about any Threatening to do Bodily Harm or Legal Threat to write her up, because ^{it} makes no sense nor serves any purpose for (Petitioner) to Threaten Counselor - Osborne with Bodily Harm when (Petitioner) did need Counselor - C. R. Tiller to notarize, copy, and give (Petitioner) back his "LEGAL WORK" because both Counselor(s) have the same Counselor Office and Counselor - C. R. Tiller was (Petitioner(s)) Counselor, and Counselor - Osborne had nothing to do with (Petitioner and Counselor - Tiller). Now reality is this, Your Honorable Chief Justice and Justices (Petitioner) gave his "LEGAL DOCUMENTS" to Counselor - C. R. Tiller on May-26th-2020 and on June-1st-2020 (Petitioner) signed a Money Withdraw Form to have \$6.00 deducted from (his/my) Inmate Account and gave the Form to Counselor - C. R. Tiller to process it to the Business Office and Counselor - H. A. Osborne intervened because she said that (she) wasn't going to "NOTARIZE" any of my Legal Document(s) because (she(s)) a "PUBLIC NOTARY" and not C. R. Tiller, so I ask'(d) for

a "INFORMAL COMPLAINT" to write up Counselor - H.A. Osbourne because she told C.R. Tiller and (Petitioner) that (Petitioner) wasn't going to get back his Legal Document(s) because it(s) Law Suit Stuff against the prison system. Id. pursuant to 42 U.S.C. § 1997 a.

C O N C L U S I O N

For the previous reason(s) stated within this "PETITION", (Petitioner) humbly pray(s) that this Supreme Court "GRANT AND REVERSE CERTIORARI" in this case to resolve the issue(s) of an "ENTITLED INSTITUTIONAL CRIMINAL DISCIPLINARY PROCEDURE", "PRISONER(S) RIGHT TO PRIVACY", "FALSE DISCIPLINARY CHARGE(S)", "ONGOING RETALIATION(S)", and "AMENDING AN AMENDED 3 1983 COMPLAINT AFTER JUDGMENT", while the 4th Circuit Court of Appeal(s) has not yet rendered any judgment in it(s) pending appeal in record number: 20-7206.

May "GOD" rest the Honorable Soul and Life of "JUSTICE" - Ruth Ginsburg for her decade(s) of "PUBLIC SERVICE" and "INTELLIGENT" interpretation(s) of Constitutional, Statutory, and Procedural understanding made under "GOOD FAITH" for the "DEMOCRACY" of the United State(s) of America "PEOPLE" establishing a more perfect Union within the "PURSUIT OF OUR HAPPINESS". Id.

RESPECTFULLY SUBMITTED BY,

Signature Lorenza Gerald Ferebee Jr.

(Pro-Se Petitioner) - Lorenza Gerald Ferebee Jr.

14 Allen(s) Ridge State Prison

P.O. Box 759

Big Stone Gap, VA. 24229

Page (40) Prisoner State Number: 2072698