

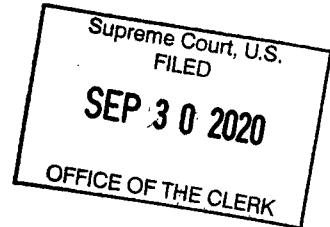
20-6595  
No. 19-2398

4:19-cv-02050 RB H

ORIGINAL

IN THE  
SUPREME COURT OF THE UNITED STATES

Clara Lewis Brockington — PETITIONER  
(Your Name)



vs.  
Salem United Methodist — RESPONDENT(S)  
Church, Rev. Bryan Mungo, Et. al.  
ON PETITION FOR A WRIT OF CERTIORARI TO

United States Court of Appeals for Fourth Circuit  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Clara Lewis Brockington  
(Your Name)

P. O. Box 3232

(Address)

Florence, SC 29502  
(City, State, Zip Code)

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## QUESTIONS

1/ Why was my membership terminated from Salem United Methodist Church when other members of this church got baptized outside of Salem United Methodist Church?

2/ Would this process be a form of discrimination against me when 50 members or more were baptized at other churches and allowed to remain members of Salem United Methodist Church?

3/ Rev. Mungo questioned me about printing his name and sending the Golden Crown application to Gail Corn in Columbia, SC without letting him review it. After Rev. Mungo assumed that I was defensive when I asked for a private meeting and not to meet with two others in the room, why did he chose to terminate my membership in this discriminatory matter?

4/ Why didn't Rev. Mungo consult with the staff at the United Methodist Conference who is affiliated with members getting baptized at their spouse's churches because Salem United Methodist Church does not baptize "in water"?

5/ Was Rev. Mungo angry with me when he refused my request for a meeting between the two of us, which is my RIGHTS?

6/ Can Rev. Mungo make any decisions without Maxine McClain and Dorethia Bailey?

7/ Why Rev. Mungo refused to give me a copy of a letter from Maxwell Baptist Church stating I was a member if it was his confirmation?

8/ Why Rev. Mungo refused to accept the letter from Rev. McCowan, Pastor at Maxwell Baptist Church, that I was ONLY baptized at my spouse's church and not a MEMBER?

9/ Did Rev. Mungo check with previous Pastors at Salem United Methodist Church on baptism outside of the church is acceptable since Salem does NOT baptize in water?

10/ Why didn't Rev. Mungo inquire from the previous Pastor of Salem United Methodist Church if I discussed baptism with her before she was moved to another church and got confirmation on what to do?

## **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**

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## TABLE OF AUTHORIZED CITED

### CASES

Korematsu v. United States 323 U.S. 214 (1944)

Shelley v. Kraemer 334 U.S. 1 (1948)

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Bailey v. Patterson 369 U.S. 31 (1962)

Loving v. Virginia 388 U.S. 1 (1967)

Jones v. Alfred H. Mayer Company 392 U.S. 409 (1968)

Lau v. Nichols 483 F. 2d 791 (1973)

University of California Regents v. Bakke 438 U.S. 265 (1978)

Batson v. Kentucky 476 U.S. 79 (1986)

Grutter v. Bollinger 539 U.S. 306 (2003)

Schuette v. Coalition to Defend Affirmative Action 572 U.S. 291 (2014)

## **STATUTES AND RULES**

**Title VII of the Civil Rights Act of 1964**

**Title I of the Americans with Disabilities Act**

**Section 1981 of the Civil Rights Act of 1866**

## **OTHER**

**United States Constitution – Amendment V**

**United States Constitution – Amendment XIV**

A handwritten signature, appearing to be "JK", is located in the bottom right corner of the page.

IN THE  
SUPREME COURT OF THE UNITED STATES  
PETITION FOR WRIT OF CERTIORARI

Appendix B

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

The opinion of the United States district 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.

For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix D 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

*Appendix C*

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was \_\_\_\_\_

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: \_\_\_\_\_, 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 June 24, 2020.  
A copy of that decision appears at Appendix D.

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).

## **CITATIONS OF OPINIONS**

U.S.C. § 630(b)(2) ADEA

## **CONSTITUTIONAL PROVISIONS AND STATUTES**

According to the Fifth Amendment of the Constitution Pro Se Plaintiff has the right to decide what church I want to attend and what church I want to be baptized. Pro Se Plaintiff spoke with the previous Pastor who explained in detail to Rev. McCowan and me that Pro Se Plaintiff can be baptized at spouse's church, but not to become a FULL MEMBER by attending New Member Classes, joining different organizations, etc. Pro Se Plaintiff abided by the "United Methodist Book of Discipline" as well as instructions from the Previous Pastor. The Previous Pastor spoke with me approximately October 18, 2019 and stated that I can get baptized at my spouse's church under numerous criteria's and will remain a FULL MEMBER of Salem United Methodist Church. The criteria's are: 1/Immersed in water; 2/Reaffirmation of baptism (Methodist do not believe in re-baptism); 3/Watch Care; and 4/Associate Member. I followed the Previous Pastor's recommendations and was retaliated against by Rev. Brian S. Mungo, the new incoming Pastor because he refused to meet with me alone to discuss his issues. This is to show that I was treated unfairly due to my age, disability, and knowledge by Rev. Mungo and removed from the ONLY church I became a member since I was 13 years old and I am now 64 years of age. I was an active member all of those years and wish to return where my HIGHER POWER placed me as a Christian Member.

The Due Process of the Fourteenth Amendment of the Constitution states that, "No state shall deprive any person of life, liberty or property, without due process of the law; nor deny to any person within its jurisdiction the equal protection of the laws." This statue means that Rev. Brian S. Mungo, Salem United Methodist Church, et al., deprived me of my members, association, chairing numerous committees, having a familiar place to worship every Sunday, bringing about changes in adults, changing livelihood of many, bringing visitors to Christ, increasing membership and finances at the church, etc., by terminating my membership to retaliate when I requested a meeting between he and I ONLY. I have been discriminated against, retaliated against, presented with injustice, prejudices, treated unfairly causing me stress, depression, anxiety, sleepless nights, crying spells, fear, etc. I have followed the protocol of the United Methodist Conference and now MOTION to the U. S. Supreme Court to grant me to return back to my place of worship and to all positions which I held in Salem U. M. Church.

## **STATEMENT OF THE BASIS FOR JURISDICTION**

The Judgement of the United States Court of Appeals was entered on June 24, 2024 denying my MOTION for Rehearing. Pro Se Plaintiff is now before the Supreme Court as an Indigent Petitioner for Writs of Certiorari to review and grant in favor of Pro Se Plaintiff. Thanks!

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# ESTUDATS D'IA SNOBLINAR A JANOTITZIOS

APDA (S)(D)(OE3 & J.S.)

## СИМИО АО СИТИАД

## STATEMENT OF THE CASE

### FACTUAL BACKGROUND

Pro Se Plaintiff grew up in Salem United Methodist Church from birth. I became a full member of Salem United Methodist Church at the age of 13. I became a member of the choir, usher board, trustees, Nominating Leadership Secretary, Chairperson of the Adult Ministry, Chairperson of two member Praise Team (daughter and niece) and assisted with many other organizations and committees where needed.

My mother, sister, cousins, grandmother, grandfather, aunts, uncles, friends, associates and many others are full members of Salem United Methodist Church and were baptized at other churches, places, etc. I spoke to most of these members and they informed me that this is discrimination and they will testify and tell the truth if this case is taken to court by Pro Se Plaintiff. This is to say that my member at Salem United Methodist Church was NOT terminated due to getting baptized at Maxwell Baptist Church, when the pastor, Rev. McCowan confirmed with his memo that I ONLY got baptized under re-affirmation of my baptism. Rev. Mungo is aware that he has issues with women, due to his preferred status, and has no professionalism when it comes to handling church matters. I have a MOTION to the Court that his termination of my membership is overturned by the Supreme Court because there are NO confirmations that I am a member or FULL member of Maxwell Baptist Church. The Previous Pastor gave me instructions and I followed her instructions.

According to the numerous Pastors that I spoke to concerning this matter, the Pastors all stated that this is UNETHICAL to terminate anyone's membership because a REAL Pastor called by GOD brings membership to the Church and not terminate memberships from the church. Rev. Mungo is a new pastor with no formal education (no bachelor's, master's or doctorate degrees) and this shows that he cannot make professional decisions for Salem United Methodist Church. A high school diploma does not qualify anyone to become a Pastor in the United Methodist Churches. The numerous pastors recommended that I take this to the Bishop who referred it to the District Superintendent (Rev. Hipp) who was transferred to another district. Rev. Fleming came to this District, not knowing anyone and allowed Rev. Mungo to

cooperates, lack of communication, lack of knowledge, lack of skills, lack of education, etc. P10  
Se Plaintiff has a MOTION before this COURT to reverse the termination from Salem United  
Methodist Church and allow P10 Se Plaintiff to return to the Salem United Methodist Church  
expeditely to continue being active in all his positions held. P10 Se Plaintiff has and has had the  
McFadden recall out of his subordinates and is able to receive all the needs to be a PASTOR of  
Salem United Methodist Church as all the previous pastors in the past. I talked with Higher  
Power that the Supreme Court will take all of P10 Se Plaintiff into consideration and rule in  
favor of the P10 Se Plaintiff. Thanks in advance for your consideration on this Motion.

## REASONS FOR GRANTING THE WRIT

Pro Se Plaintiff is requesting the WRIT because Federal, State and County Laws have been broken by the Salem United Methodist Church, Rev. Brian S. Mungo, ET. al, as well as several Amendments (noted under statutes) concerning my rights have been broken by these same Defendants intentionally, (and refused to meet, contact other Pastors, etc.,) and never corrected or resolve. I have been discriminated against, while others went and got baptized at other churches, but still remain full members of Salem United Methodist Church. This is a fact because my own parent(s), siblings, aunts, cousins, etc., can and will validate these FACTS.

I have family and friends that are willing to testify to all of the wrongdoings, prejudices, discrimination and received no notification from this Pastor that the previous Pastors have guided me in the wrong direction. Rev. McCowan was NEVER contacted by Rev. Mungo, who is NOT a United Methodist Pastor, because he does not have the required credentials, education, leadership skills, etc., to lead a congregation. Due to the District Superintendent and the Bishop have hired him and refused to correct him that is another reason why this WRIT should be granted. (Example: A parent does not look at her CHILD do wrong and continue to allow them to do wrong and not use some type of corrective action.) Also, all of the unprofessionalism directs any reader, witness, Plaintiff, Defendant, COURT, etc., to the facts that the case is prejudice, discriminatory, etc. Pro Se Plaintiff has always held leadership positions in the church (Nominating Leadership Secretary, Trustee, Chairperson of committees, Girl Scout Leader, choir member, usher, etc., and no Pastor or other persons have ever come to Pro Se Plaintiff to discuss anything concerning wrongdoings.

Pro Se Plaintiff is elderly, retired from working with the courts after 15 years, has a Master's Degree, Bachelor's Degree and Associate Paralegal Degree and none of Superiors can tell or show any type of disciplines that I ever received for anything. I would like for anyone to tell me why I got this termination of membership letter from this LAST Pastor to be sent to the Salem United Methodist Church, and I was born and raised in this church all of my life. Why hasn't another PASTOR (degreed, experienced, skilled, has leadership skills, know how to run a

Church or request that a letter be sent from Maxwell Baptist Church of that content. Again, Rev. Mungo is neither a PASTOR, nor a PREACHER and does not have the education, credentials, qualifications, leadership skills, etc., to lead any congregation or group of people to the Promise Land. There are so many loopholes in this case that no one will ever be able to say why Rev. Mungo showed negative, discriminatory and prejudice acts toward me when I was NEVER a problem member. Pro Se Plaintiff tried to interact, contact, follow up and resolve whatever issues he had with me, but he refused to return calls, meet after church, return e-mails, etc. Pro Se Plaintiff is dealing with stress, depression, anxiety, sleepless nights, crying spells, discrimination, prejudices, wrongdoings, embarrassment, etc., that I don't want to be seen in my community, do leisure activities, eat, sleep, worship GOD anymore, do family things, etc., anymore. It is unfair to me to have to live the remainder of my life like this. Pro Se Plaintiff is very sadden every day and my family wants to quit this church, but I expressed to them to allow me and GOD to handle this matter and they remain neutral. Why should my children, deceased spouse, family and friends have to live their lives like this? That is because Rev. Mungo don't care what he does to any member, as long as the Bishop and District Superintendent allows him to get away with it, and not supervise him properly because he has NOTHING positive to show the members of Salem United Methodist Church.

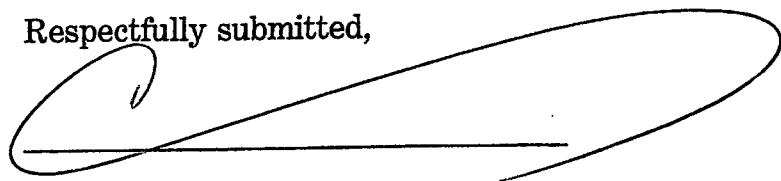
## **CONCLUSION**

In my conclusion, Pro Se Plaintiff is requesting that the COURT review this WRIT closely in its entirety, as well as the attachments and rule in favor of the Pro Se Plaintiff due to the medical, mental and psychological damages that I have to live with the remainder of my lifetime. I am also dealing with financial damages with loss of income for years when I could not go to work, as well as discrimination, wrongful treatment, prejudices, embarrassment, termination from a church I was borne, raised and spent all of my adult and senior life, pain and suffering, etc., for the remainder of my life. Please rule in favor of Pro Se Plaintiff for a settlement (through MEDIATION, if needed), returning as a full Member of Salem United Methodist Church (without going through any membership activities) and return to all of my positions that I held before being terminated from the Church. I would also recommend the termination of Rev. Mungo, Rev. Fleming and Bishop Holston expedite. Thanks in advance!

## **CONCLUSION**

The petition for a writ of certiorari should be granted.

Respectfully submitted,

A handwritten signature, appearing to be a stylized 'C', is enclosed within a large, thin-lined oval.

Date: August 17, 2020