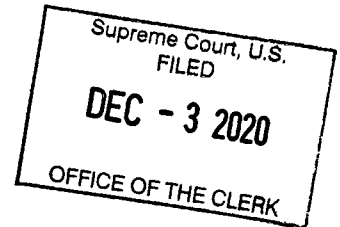


20-6999

No.

ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES



Kannha Bounchanh,

Petitioner

v.

Washington State Health Care Authority(HCA), et al,

Respondent(s).

On petition for Writ of Certiorari to the United States

Court of the Appeals for the Ninth Circuit

PETITION FOR WRIT OF CERTIORARI

Kannha Bounchanh
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PETITIONER, PROSE LITIGANT

QUESTIONS PRESENTED FOR REVIEW

1. Whether panel of judges at the Ninth Circuit court have violated my Due Process and Equal Justice process and the Equal Protection Clause under the Fourteenth Amendment of the U.S. Constitution and the ADA, ADAA2008, Title VII of Civil Rights Act of 1964.
2. Whether they have violated my due process and equal justice process under the Fourteenth Amend. of the U.S. Constitution when they ignored all evidence that I submitted to the court.
3. Whether they violated my due process and equal justice under the Fourteenth Amendment of the U.S. Constitution when they used their abuse of power to discriminate against me after the court has already accepted, filed and granted my pleading motions and pleading motions for reconsideration in Docket numbers (Dkt#49, 51, 52, 53, 54, 55, 56, and 57). Attached copy of case summary of case no. 19-36059 from December 2019 to December 12, 2020 in Appendix A.
4. Whether they intentionally ignored the fact that the U.S. District court not only did not give me my due process and equal justice under the rules of law(5th&7th Amendment of the U.S. Constitution, LCR 38, LCR 1(d), and hided some submitted evidence from my case.

LIST OF PARTIES INVOLVED

The parties involved are: Kannha Bounchanh v. Washington State Health Care Authority(HCA), DSHS, WSHRC, AGO, EEOC, AFSCME UNION, et al. Names of their employees, appellees, respondents are: Pamela Anderson, Stephen (Steve) Weeks, Leigh J. Swanson, Megan Atkinson, Sue Birch, Robert Bouffard, Jody Costello, Steve Dotson, George Taylor, Jean Bui, Kerri Kallay, Scott Palafox, Dylan Oxford, Michael Ottor-Johnson, Dorothy Teeter, Sharon Pecheos, Kevin Quickly, Shane Riddle, Nicole Rivera, Nancy Sienko, Andrew Steers, Kendrick, Stacie Leanos, Perry Gordon, Kurt Spiegel, Jason Watson, Patricia Lashway, Eileen A. Sherlock, Kendrick Stewart, Cheryl Strange, Cheryl Strobert, Sharon Ortiz, Grant Stromsdorfer, Andrew Steers, Myron Toyama, Toni Haley, Idolina Reta, Jeremy Page, Gregory(Greg) Devereaux, Perry Gordon, Stacie Leanos, Jason Watson in case no. 19-36059 and 19-35801 with the United States Court of Appeals for the Ninth Circuit and in the case no. 3:19-v-05171TLF(the honorable judge Theresa L. Fricke) and 3:19-v-05171RBL (the honorable judge Ronald B. Leighton) with the United States District Court of Western Washington, Tacoma, WA.

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Cases

Bostock v. Clayton County, No. 17–1618,
June 15, 2020, Supreme Court's (6 to 3 ruling) decision
Donald Zard v. Altitude Express, (No. 17–1623)
Aimee Stephen v. R.G. and G.R. Harris Funeral

Homes (No. 18–107). Cleveland Bd. of Ed. v. La Fleur(1974)

Meritor Savings Bank v. Vinson(1986)

United States v. Virginia (1996)

Statutes

Sup. Ct. R. 14.1(g)(i). 5,6,7,8

42 U. S. C. §2000e–2(a)(1). passim

42 U. S. C. §2000e–4. passim

28 U. S. C. §2403(a) 1 to 17

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28 U. S. C. §451. 1 to 17

Other Authority

U.S. Const. amend. XIV passim

EEOC's Charge for Discrimination. 2018, 2015 passim

EEOC's Notice of Rights-To-Sue. passim

December 12, 2018 and March 1, 2019

U.S. Const. amend V, VII. passim

OPINIONS DECISION BELOW

[x] For cases from federal courts: Kannha Bounchanh v. Washington State Health Care Authority (HCA), et al. The opinion of the United States court of appeals appears at Appendix A 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: Kannha Bounchanh v. Washington State Health Care Authority(HCA), et al, case: 19-cv-05171-TLF and case: 19-cv-050171-RBL appears at Appendix A to the petition and is ☐ reported at U.S. District Court; or, ☐ has been designated for publication but is not yet reported; or, ☒ is unpublished. The Ninth Circuit judges(Canby and Gould) granted amended cross-appeal for above cases and the \$505 docket filing fee waiver under Forma Pauperis for my above appeals on March 4, 2020(Docket#22), see attached case summary for 19-36059 in Appendix A.

JURISDICTION

[x] For cases from federal courts: Kannha Bounchanh v. Washington State Health Care Authority (HCA), DSHS, WSHRC, AGO, EEOC, AFSCME UNIO, et al. The dates on which the United States Court of Appeals decided my case were on December 1, 2020 by the CA09 Operations Manager, Stephanie and she has confirmed this via her email correspondence, November 3, 2020 and August 7, 2020 by the

honorable judges Schroeder, Hawkins and Lee; and June 11, 2020 and March 4, 2020 by the honorable judges Canby and Gould in case: 19-36059. A copy of each decision appears at Appendix A for Docket number: 61, 55, 47, and 22. [x] My reply to the court's order for the court's order on August 7, 2020 and motion for a reconsideration was timely filed and the court has accepted and filed for me. In addition, on November 9, 2020 I also filed my motion for rehearing en banc hearing by a panel of 11 judges and it was timely filed in my case. The court has accepted and filed dateentry November 9, 2020 in docket number 62. However, since then the court has changed its mind on December 1, 2020 by Stephanie, CA09Operations Manager. On the other hand, the letter or notice dateentry November 12, 2020 by Ms. Rebecca Lopez, Deputy Clerk, Ninth Circuit Rule 27-7 (see attached Appendix A) states "The judgement of this Court, entered August 07, 2020, takes effect this date. This constitutes the formal mandate of this Court issued pursuant to Rule 41(1) of the Federal Rules of Appellate Procedure." The question is why did Lopez filed this mandate and it is in conflict with the court's order on November 3, 2020 and it is very confusing to me. I looked up the rule 41(a) in the Cornell's Law Library website and states "Because Rule 41(a) "does not allow a court to **dismiss** some, but not all, of the defendants in a single case," the motion for voluntary **dismissal** was

improper." Are their above orders to deny my case without due process and equal justice process for the Title VII of the Civil Rights Act of 1964, ADA, ADAA2008 and 14th Amendment of the U.S. Constitution legal? The judges could not use their abuse of power or discretionary decisions without based on the rules of law.

[x] A timely petition for rehearing was denied by the United States Court of Appeals on the following date December 1, 2020 and November 3, 2020, and a copy of the order denying hearing and rehearing appears at Appendix A, page Appendices A to 20A. The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

[x] For cases from U.S. District courts: Kannha Bounchanh v. Washington State Health Care Authority(HCA), DSHS, WSHRC, AGO, EEOC, AFSCME UNION, et al, Defendants-Appellees. The dates on which the U.S. District Court decided my case were November 15, 2019, November 22, 2019, December 12, 2019. A copy of each decision decision appears at Appendix B, page Appendices B to 10B. I have enclosed some supplemental evidence in support of Appendix A and Appendix B. The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a). The justice Schroeder, Hawkins and Lee did not allow my due process and equal justice process under Title VII of the Civil Rights Act of 1964. They should not ignore a decision by the U.S. Supreme Court's judges (6 to 3 ruling) on June 15, 2020 in

favor the petitioners in the case of Bostock v. Clayton County (No. 17–1618). Argued October 8, 2019—Decided June 15, 2020). I've mentioned this supreme court's decision in many of my pleading motions and motions for reconsideration(See evidence in electronic case file and a copy of Case Summary in case no. 19-36059). The justice Schroeder, Hawkins, Lee, Canby and Gould of the Ninth Circuit court's decisions also conflict with other above appellate court's decisions (7th Circuit v. 2nd Circuit), and the U.S. Supreme Court's justice judges had agreed to hear these cases and settled in ruling favor of the petitioners based on the rules of law. I believe that the U.S. Supreme Court justice judges made an ethical decision based on the rules of law for the Bostock v. Clayton County, Donald Zard v. Altitude Express(No. 17–1623) and Aimee Stephen v. R.G. and G.R. Harris Funeral Homes(No. 18–107). These employees were fired because they're homosexual or transgender. Each employee sued, alleging sex discrimination under Title VII of the Civil Rights Act of 1964 and together, they sued and won their claims. For my already granted Amended Cross-Appeal for my case on March 4, 2020, the Ninth circuit's judges have failed to allow my due process and equal justice under the rules of law and they have failed to protect me under the Title VII of the Civil Rights Act of 1964 and the Fourteenth Amendment

of the Constitution. For these above legal reasons, I request that this court issue its writ of certiorari review the judgments of the United States Court of Appeals for the Ninth Circuit's judgements entered in this case on December 12, 2020, December 1, 2020, November 3, 2020, August 7, 2020, June 11, 2020, and March 4, 2020 and the court opinion denying expedite hearing request and then rehearing en banc hearing request entered on December 1, 2020 by Stephanie, CA09Operations Manager. This court and panel of judges have violated my human right, due process and equal justice under the Title VII under the Civil Rights Act of 1964, ADA, ADAA2008 and the Fourteenth Amendment of the United States Constitution. They have discriminated against me because of my race, national origin, sexual orientation and disability. They denied my amended cross-appeal and dismissed all appellees or respondents without allowing me my due process and equal justice process and I am hurt by their discriminated decision. And. I am being protected by the above federal law. And. the above cases from this Court do support my position or claim because I have met the EEOC reasonable cause and the EEOC employment law under Title VII of the Civil Rights Act of 1964, ADA, ADAA2008.

In my completed job application for MAPS3 position(program manager) in 2013 and my 31 job applications in 2018, I've declared that I am a disabled worker or a person with disability conditions for the

Title VII of the Civil Rights Act of 1964 and these evidence are in the electronic case files with the Ninth Circuit and U.S. District courts.

And, the judges ignored and failed to address all of above legal matter and jurisdiction under the Title VII of the Civil Rights Act of 1964, ADA, ADAA2008 for my claim and decided to discriminate against me. By their wrongful action, they have violated my fair Due Process and Equal Justice process under the Title VII of the Civil Rights Act of 1964 and the 14th Amendment of the U.S. Constitution. They have undermined the integrity of our legal system and violated my human right, due process and equal justice under the rules of law and did not take all admissible and undisputed evidence, which are beyond a reasonable doubt into a consideration. The evidence are my proof to the both courts and these are the facts of my case, and justices Schroeder, Hawkins and Lee did not mention these facts in their opinion in docket number: 61 on November 3, 2020.

And, The U.S. District Court's judge has denied my civil lawsuit without allowing my due process and equal justice process under the above federal rules of law and also violated the 5th and 7th Amendment of the U.S. Constitution, Local Civil Rule(38, 39), Local Civil Rule 1(d) non-discrimination. The staff at U.S. District Court attempted to hide some evidence from my case and I filed my complaint with the court's

supervisor and Mr. Brian T. Moran, U.S. Attorney and I did not hear from either one of them(see Appendix A). I received the retaliation and discrimination from the U.S. District Court's staff and judges as a result of appellees or respondents have communicated with this court's staff. It is illegal for the court's staff to hide some evidence from my case. And, the U.S. District has no legal justification or good cause reason to reassign my case to the honorable judge Ronald B. Leighton from the honorable judge Theresa L. Fricke. And, the U.S. District Court did not notify me of this change.

CONSTITUTIONAL PROVISIONS AND LEGAL PRINCIPLES INVOLVED

The Due Process Clause of the Fourteenth Amendment to the Constitution is my guaranteed to the fair due process and equal justice under the 14th Amendment of the U.S. Constitution. It is confirmed that no "State [shall] deprive any person of life, liberty, or property, without due process of law." The Due Process Clause of the Seventh Amendment to the Constitution also provides "a guaranteed for a jury demand trial" for my civil case with U.S. District of Western Washington, which this lower court violated my due process and equal justice because there is no court hearing allowed with the U.S. District Court. In the three cases above, the U.S. Supreme Court confirmed that "The Civil Rights Act of 1964 (Pub.L.

88-352, 78 Stat. 241, enacted July 2, 1964) is a landmark civil rights and labor law in the United States that outlaws discrimination based on race, color, religion, sex, national origin, and later sexual orientation. It prohibits unequal application of voter registration requirements, racial segregation in schools and public accommodations, and employment discrimination."

And: The above federal law protects my due process and equal justice.

The justice Schroeder, Hawkins and Lee have violated my Due Process and Equal Justice process and the Equal Protection Clause under the Fourteenth Amendment of the U.S. Constitution and whether they have violated the ADA, ADAA2008, Title VII of Civil Rights Act of 1964 when they changed their mind on December 1, 2020, November 3, 2020(Dkt#61) after they already granted my several optional replies and my motions for reconsideration on August 7, 2020(Dkt#55), in case 19-36059 in Appendix A and whether they have discriminated against me because of who I am and where I came from and based on my race, national origin, disability, sexual orientation. I have submitted many pleading motions and motions for reconsideration and many evidences and these are in the electronic case files with the U.S. District Court of Western Washington and the U.S. Court of Appeals for the Ninth Circuit. Many evidence in this case 3:19-cv-05171-RBL (Docket numbers: 1 through 161; and in this case 19-35801(Docket numbers: 1 through 18;

in this current case 19-36059(Docket numbers: 1 through 64) with the U.S. Court of Appeals for the Ninth Circuit. When justice Schroeder, Hawkins and Lee made their decision to deny my whole case on November 3, 2020(Dkt#61), none of the above motions and motions for reconsideration and evidence have been taken into a consideration for their decision. On November 9, 2020(Docket number#62), I replied to the court by filing my motion for a rehearing en banc hearing by the panel of 11 judges and the court responded from the Clerk's Supervisor Stephanie stating that the court will not having a look at my request (email response from her on December 1, 2020). By doing so, they have violated the above federal rules of law. They did not even look at all evidence that I've submitted to the Ninth Circuit court (See evidence in Appendix A). These are only a few of the evidence and there are many more in the electronic case files with the Ninth Circuit and the U.S. District Court. The Ninth Circuit's judges should not discriminate against me because of who I am and where I came from. I'm a good U.S. citizen and employee. And, I am entitled to my fair Due Process and Equal Justice process under the 14th Amendment of the U.S. Constitution and the Title VII under the Civil Rights Act of 1964 (See evidence in attached case summary of case no. 19-36059). The Ninth Circuit's judges should not allow an affirmance of the U.S. District Court's ruling in favor with all respondents after I have submitted many admissible evidence which are beyond a reasonable doubt(See Appendix A and B) and

without allowing my due process and equal justice process under the above federal rules of law.

They have also violated my due process and equal justice process under the 14th Amend. of the U.S. Constitution when they ignored and failed to address the federal Equal Employment Opportunity Commission(EEOC) employment law, ADA, ADAA2008, Civil Rights Act of 1964, FMLA, HIPPA that respondents have violated.

The attached Notice of Rights-To-Sue from date stamp December 12, 2018 for the 2015&2016 combined EEOC charge from Roderick Ustanik(See Appendix A&B to the petition) and from date stamp March 1, 2019 for the 2018 EEOC charge from Kristine Jensen Nube (See page 8, F to the petition), Charge for Discrimination from the June 15, 2018 and April 16, 2015 from Nancy Sienko(See Appendix A, to the petition), and my civil lawsuit filing on March 6, 2019 with U.S. District Court of Western District of Washington(See electronic case file with case no. 3:19-cv-05171-RBL(justice Ronald B. Leighton) and my amended complaint of 42 pages (docket number 7, filed date entry April 18, 2019 are my evidence that there is no time-barred. I do not understand why the Ninth Circuit's judges have an idea that there is a time-barred for my civil lawsuit in the case summary. And. They have used their abuse of power to discriminate and to deny my whole case on November 3, 2020.

Their wrongful act has violated the above federal rules of law in my case.

The question needs to be addressed and seek an answer is this:

why did they change their mind on November 3, 2020? My answer to this question is because they refused to allow my fair due process and equal justice under the Title VII of the Civil Rights Act of 1964 and the Fourteenth Amendment of the U.S. Constitution. And. That is also a reason why they did not take a look at my case history and take all evidence into a consideration for their decision on November 3, 2020. Many evidence in the electronic case files with this current case no. 19-36059, and case no. 19-35801 with the Ninth Circuit and case no. 3:19-cv-05171-RBL with the U.S. District Court and they have ignored all of the above evidence. It is wrong and unethical and illegal decision when they have discriminated against me and ruled in favor with all respondents without allowing my fair due process and equal justice process.

They have violated my due process and equal justice process under the 14th Amendment of the U.S. Constitution when they ignored the fact that U.S. District Court hid some evidences from my case and has violated my Seventh Amendment of the U.S. Constitution for my legal right to ask for a jury demand trial for my civil lawsuit.

The District Court's Ruling in favor of all respondents without allowing my due process and equal justice process under the Title VII of the Civil Rights Act of 1964 and under the Fourteenth Amendment of the U.S. Constitution. The U.S. District Court refused to allow a hearing for my civil lawsuit although I have requested for the jury demand

trial (See evidence in these docket numbers: 1, 1-1, 3-1, 7 in the electronic case file with the U.S. District Court in case no. 3:19-05171-RBL). The U.S. District Court has violated my Fifth and Seventh Amendments of the U.S. Constitution and the LCR 38 and LCR 1(d) by denying an appointment of counsel under Title VII of the Civil Rights Act of 1964 and attempted to hide some evidence from my case(See evidence in docket number: 61-1, 100 and 101-1 with the U.S. District Court). The Local Civil Rule(LCR)38, right for a jury demand trial, and Local Civil Rule1(d), prohibit discrimination and the Title VII of the Civil Rights Act of 1964 are my legal right protection and these federal rules support my position or claim. This is the 4th time I have received bully, retaliation and discrimination by my same employer(DSHS), including the sexual harassment by my former social services supervisor in 2006.

§These above case summary of docket numbers constitute part of the opinion of the court or court's order. It has been prepared by court staff of the Ninth Circuit court and U.S. District Court of Western District Washington for the convenience of the reader.

STATEMENT OF THE CASE AND FACTUAL BACKGROUND

My civil lawsuit case involves the Title VII under Civil Rights Act of 1964. I filed my civil lawsuit on March 6, 2019 and amended complaint on April 18, 2019(Docket number 7, 43 pages with the U.S. District Court, in case no. 3:19-cv-05171-RBL) after I received the two Notices of Right-To-Sue from the EEOC staff members (Roderick

Ustanik, EEOC Enforcement Officer and Kristine Jensen Nube, EEOC Program Manager. This lawsuit involves the bully, retaliation and discrimination by the Washington State Department of Social&Health Services(DSHS), Washington State Health Care Authority(HCA), Washington State Human Rights Commission(WSHRC), Washington State Attorney's General Office(AGO)-Torts Division, Equal Employment Opportunity Commission(EEOC), and AFSCME Union and their employees or respondents. These respondents decided to discriminate against me and decided to assist my x-DSHS employee whom my 2 supervisors and 2 senior DSHS consultants and I had fired after our several telephone conference calls and one face-to-face meeting at DSHS in June 2013. The DSHS (new management team members) and HCA employers betrayed me and set me up to fail and decided to get rid of me by bullying, retaliating, and discriminating and creating a hostile working environment and abused me to the point where I have had my mental health breaking down or mentally tortured by some respondents.

I reported about the bully, retaliation, and discrimination to many respondents and they ignored my serious personnel issue that I raised with them and did not make the bully, retaliation and discrimination stop (evidence in Docket numbers: 1, 1-1, 3-1, 7, 31-1, 61-1, 100, 101-1 with the U.S. District Court) and evidence in docket numbers: 1 through 64 with the current case no. 19-36059 and 1

through 18 with the previous case no.19-35801 with the Ninth Circuit. These are electronic case records. (See evidence by Dr. Jill C. Kinney and Dr.Thinh Xuan Ho in the electronic case file with the Ninth Circuit, 9-36059, and in case no. 3:19-cv-05171-RBL with U.S. District Court. The mental health and emotional tortured until I couldn't function at work to the point where I had to walk away and quit in May 2015 and after I had exhausted all of my sick leave balance in June 2015. The respondents had bad motive and their wrongful act is an effort to get rid of me because I complained about their bully, retaliation and job discrimination in the workplace, such as my filing Tort's claim and the EEOC complaint and engage in EEOC investigative process. On April 13&16, 2015, I filed my EEOC complaint(See attached copy of EEOC charge for 2015 and 2016 combined by Ms. Nancy Sienko, EEOC Executive Director in the Appendix B). The EEOC's result of investigation showed no reasonable cause and no discrimination (See attached copy of Notice of Rights-To-Sue from December 12, 2018 and copy of Charge for Discrimination for 2015&2016 combined in Appendix A). It turned out that the WSHRC and EEOC and its employees or respondents have chosen to assist my x-DSHS employee, and I received the bully, retaliation and discrimination by EEOC and its employees or respondents(See evidence in Dkt#33, 264 pages, dateentry: February 2, 2020 for

N27-3 emergency reliefs request; Dkt#35, 127 pages; Dkt#57 pages with the Ninth Circuit). EEOC hid 66 pages of my evidence on July 29, 2015 and I had to provide another copy to EEOC on September 16, 2015. On February 26, 2019, I returned to EEOC office in Seattle, WA for help and staff at reception refused to assist me and turned me away.

In 2018, I attempted to return to work for DSHS employer again knowing that I have had excellent work histories with DSHS from August 9, 1991 to June 30, 2013 prior to my employment with HCA employer effective July 1, 2013. However, all of my submitted 31 job applications showed either reject or not qualified after my nearly 25 years of my employment with the State of Washington from August 9, 1991 to June 25, 2015. I contacted Ms. Margaret Maddox, Acting DSHS Human Resources Director and she suggested to me that I need to file an EEOC complaint with the Washington State Human Rights Commission(WSHRC), which I did. However, WSHRC and its respondents refused to help me. It turned out that WSHRC and its respondents already assisted my x-employee and decided to discriminate against me. I was not rehired by my former DSHS employer in 2018. I received the employment discrimination by my DSHS employer, which is a Civil Rights violation under these rules of EEOC law, ADA, ADAA2008 and Civil Rights Act of 1964. By refusing to assist me with my EEOC complaints, WSHRC and EEOC have discriminated against me and they have violated the above federal rules of law. This is against the

and they have violated the above federal rules of law. This is against the
my EEOC complaints, WSHRC and EEOC have discriminated against me
ADA/A2008 and Civil Rights Act of 1964. By refusing to assist me with
a Civil Rights violation under these rules of EEOC law, ADA,
received the employment discrimination by my DSHS employer, which is
against me. I was not retired by my former DSHS employer in 2018. I
respondents already assisted my x-employee and decided to discriminate
respondents refused to help me. It turned out that WSHRC and its

Commission (WSHRC) which I did. However, WSHRC and its
complaint with the Washington State Human Rights

Resources Director and she suggested to me that I need to file an EEOC.
22. 2012. I contacted Ms. Margaret Wadsworth, Acting DSHS Human

employment with the State of Washington from August 9, 1991 to June
showed either reject or not qualified after my nearly 22 years of my

effective July 1, 2012. However, all of my submitted 31 job applications
9. 1991 to June 30, 2013 prior to my employment with HCA employer

knowing that I have had excellent work histories with DSHS from August
In 2018, I attempted to return to work for DSHS employer again

for help and staff at reception refused to assist me and turned me away.
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29. 2012 and I had to provide another copy to EEOC on September 16,
with the Ninth Circuit. EEOC hid 66 pages of my evidence on July

N27-3 emergency reliefs request Dkt 32, 127 pages: Dkt 27 pages

Gov. Jay Inslee's Executive Order 13-02 in 2008, which his mandate to hiring a person with disability as required by the Diversity Program and Inclusion Program for the State of Washington (See attached copy of Notice of Rights-To-Sue date March 1, 2019 from EEOC and copy of Charge for Discrimination for 2018 by Nancy Sienko, EEOC Executive Director for 2018). WSHRC and EEOC agencies and their employees or respondents also chose to discriminate against me and they didn't allow my due process and equal justice under the Title VII of the Civil Rights Act of 1964. I filed my Torts' claim with the Washington State's Attorney General Office and I received the bully, retaliation and discrimination by this agency and its respondents(See evidence in Dkt#33,264 pages, dateentry: February 2, 2020 for N27-3 emergency reliefs request; Dkt#35, 127 pages; Dkt#57 pages with the Ninth Circuit). I also asked the AFSCME Union and its respondents, but they refused to help and I also received the discrimination by the union and its employees or respondents as well because this union and its employee or respondent already represented my x-DSHS employee and that is why they refused to help me. Then, I asked many attorneys to help but they all declined to assist me with my civil lawsuit case (See evidence in Docket number: 111 with the U.S. District court). After I have exhausted all of my resource, I have no other choice but to file a civil lawsuit on March 6, 2019 with the U.S. District Court at Tacoma, WA. And, I filed my Amended complaint(Dkt#7, date entry: April 18, 2019, 43 pages), adding the

complaint (Docket # 18, 2019, 43 pages), adding the District Court at Tacoma, WA. And, I filed my Amended other choice but to file a civil lawsuit on March 6, 2019 with the U.S. District court. After I have exhausted all of my resource, I have no with my civil lawsuit case (See evidence in Docket number 111 with the me. Then, I asked many attorneys to help but they all declined to assist me represented my x-DSSH employee and that is why they refused to help as well because this union and its employees or respondents already received the discrimination by the union and its employees or respondents AFSCME union and its respondents, but they refused to help and I also 127 pages: Dkt#27 pages with the Ninth Circuit. I also asked the date: February 2, 2020 for 127-3 emergency relief request Dkt#32. this agency and its respondents (See evidence in Dkt#33, 204 pages, General Office and I received the bully, retaliation and discrimination by Act of 1964. I filed my Tort, claim with the Washington State Attorney my due process and equal justice under the Title VII of the Civil Rights respondents also chose to discriminate against me and they didn't allow Director for 2018). WSHRC and EEOC agencies and their employees or (charge for Discrimination for 2018 by Nancy Sienko, EEOC Executive Notice of Rights-To-Sue date March 1, 2019 from EEOC and copy of Inclusion Program for the State of Washington (See attached copy of hiring a person with disability as required by the Diversity Program and Gov. Jay Inslee's Executive Order 13-02 in 2008, which his mandate to

AFSCME Union and its employees or respondents to my civil lawsuit.

In a case of *Bostock v. Clayton County*, on June 15, 2020, the U.S. Supreme Court judges (6 to 3 ruling), "The Court held that Title VII of the Civil Rights Act of 1964 forbids employment discrimination based on sexual orientation and gender identity." And. "This ruling clearly states that sexual orientation and gender identity discrimination are sex discrimination for the purpose of the Act, and are therefore illegal under federal law."

§1 Record citations are to the record filed in the U.S. Supreme Court justice rulings on June 15, 2020, *Bostock v. Clayton County* (42 U.S.C. 2000e-14§ 40.1-33.1)

REASONS FOR GRANTING THE WRIT

1. If the Ninth Circuit and the above three judges carefully reviewed my whole case and take all facts and evidence into a consideration (case no: 3:19-cv-05171-RBL (docket numbers: 1 through 160); case no. 19-35801 (Docket numbers: 1 through 18) and case no. 19-36059 (docket numbers: 1 through 64) when they made their decision on November 3, 2020 (Dkt#61), they would have made an ethical and legal decision for my case. Instead of helping me, they decided to discriminate against me and ruled in favor of all respondents without allowing me my due process and equal justice under the Fourteenth Amendment of the U.S. Constitution.

AFSCME Union and its employees or respondents to my civil lawsuit.
 In a case of *Bostock v. Clayton County*, on June 15, 2020, the
 U.S. Supreme Court judges (6 to 3 ruling), "The Court held that Title
 VII of the Civil Rights Act of 1964 forbids employment discrimination
 based on sexual orientation and gender identity." And, "This ruling clearly
 states that sexual orientation and gender identity discrimination are sex
 discrimination for the purpose of the Act and are therefore illegal under
 federal law."

U.S.C. 2000e-14§ 401-33.1)
 Court Justice rulings on June 15, 2020, *Bostock v. Clayton County* (42
 U.S. Record citations are to the record filed in the U.S. Supreme

REASONS FOR GRANTING THE WRIT

1. If the Ninth Circuit and the above three judges carefully reviewed
 my whole case and take all facts and evidence into a consideration/case
 no. 3:19-cv-02171-RBL (docket numbers: 1 through 160); case no.
 19-32801 (Docket numbers: 1 through 18) and case no. 19-36029
 (docket numbers: 1 through 64) when they made their decision on
 November 3, 2020 (Dkt# 1), they would have made an ethical and legal
 decision for my case. Instead of helping me, they decided to discriminate
 against me and ruled in favor of all respondents without allowing me
 my due process and equal justice under the Fourteenth Amendment of
 the U.S. Constitution.

2. If the Ninth Circuit and the above judges didn't discriminate against me and allow my due process and equal justice under the Title VII of the Civil Rights Act of 1964, I would win my case. And. The Ninth Circuit's judges failed to protect me under the 14th Amendment of the U.S. Constitution.

3. If the Ninth Circuit didn't ignore these submitted additional evidence:

2 Notices of Rights-To-Sue and copy of Charge for Discrimination by Ms. Nancy Sienko, EEOC Executive Director, for 2018 and 2015, they would have been making the right decision and ethical decision according to the above rules of law for my case.

4. Because I am a disabled person, I have met the EEOC law, ADA, ADAA2008, Civil Rights Act of 1964, FMLA and HIPAA reasonable cause and the law, I am being protected by these federal rules of law and the 14th Amendment of the U.S. Constitution(See Dickerson v. United States, 530 US 428, 434, 120 S Ct .2326, 147 L Ed 2d 405 (2000) (citing Malloy v. Hogan, 378 US 1, 6-11, 84 S Ct 1489, 12 L Ed 2d 653 (1964))). The U.S. Supreme Court judges are agreed with the Title VII of the Civil Rights Act of 1964 for the 3 individual employees and that is why they "p.4And we granted certiorari in these matters to resolve at last the disagreement among the courts of appeals over the scope of Title VII's protections for homosexual and transgender persons. 587 U. S. ____ (2019)."

5. The bully, retaliation and discrimination has happened to me the

2. If the Ninth Circuit and the above judges didn't discriminate against me and allow my due process and equal justice under the Title VII of the Civil Rights Act of 1964. I would win my case. And, The Ninth Circuit's judges failed to protect me under the 14th Amendment of the U.S.

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2d 623 (1964)). The U.S. Supreme Court judges are agreed with the Title VII of the Civil Rights Act of 1964 for the 3 individual employees and that is why they "b. And we granted certiorari in these matters to resolve at last the disagreement among the courts of appeals over the scope of Title VII's protections for homosexual and transgender

persons. 287 U.S. ____ (2019)."

5. The bully, retaliation and discrimination has happened to me, the

4th time by my same employer and it could happen to anyone else or any employee, and the Supreme Court can help make it stop. My reporting a Civil Rights Act of 1964 violation helps make the workplace a safe environment for everyone.

6. Because of who I am and where I came from and I'm a good U.S. citizen, I am entitled to my fair Due Process and Equal Justice process under the 14th Amendment of the U.S. Constitution and the Title VII under the Civil Rights Act of 1964 (See evidence in attached case summary of case no. 19-36059 and Appendix A) and the justice Schroeder, Hawkins and Lee didn't allow this to happen and they decided to discriminate against me and denied the already granted AMENDED CROSS-APPEAL by the Ninth Circuit court and the honorable judge Canby and Gould on March 4, 2020(docket number 22). Their wrongful action has violated my due process and equal justice process under the 14th Amendment of the U.S. Constitution and the Title VII under the Civil Rights Act of 1964.

7. This is the 4th time I have received bully, retaliation and discrimination by my same employer(DSHS), including the sexual harassment by my former social services supervisor in 2006. Because of my two previous employers(DSHS and HCA) bad motive and intention, malicious behavior, and they set me up to fail miserably, betrayed me and destroyed my good life and good health and I did not have a chance to become a successful employee at HCA and no

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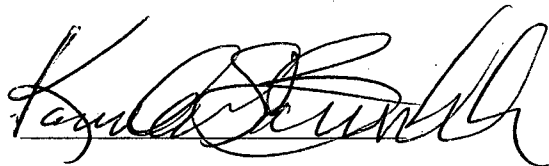
employer, especially DSHS employer, rehired me in 2018, I need my justice and the relief for all the damages that all appellees or defendants have caused to my life (they destroyed my good health, professional career of nearly 25 years, and good reputation in many communities; and because of their wrongful act, I live in fear for my life on the daily basis and I have been physically and emotional pain and suffering on the daily basis. I often have nightmares, depression, anxiety and many sleepless nights and poor health). One of appellees had communicated with my health care providers, I woke up with a machine still stuck inside of me and the doctor who performed my colonoscopy procedure in March 2014 had poked me and damaged my intestinal organs. As a result of that, I have problem with my digestive system and poor health nowadays.

CONCLUSION

Therefore, I respectfully request that the U.S. Supreme Court's judges of the United States grant my petition for writ of certiorari.

Respectfully Submitted,

January 5, 2021

A handwritten signature in black ink, appearing to read 'Kannha Bounchanh', written over a horizontal line.

Kannha Bounchanh
Petitioner, Prose Litigant