No. 20-7153

IN THE

SUPREME COURT OF THE UNITED STATES

Anthony Lonnie Forbes — PETITIONER
(Your Name)

vs.

SeaWorld Entertainment INC. et al — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

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

PETITION FOR WRIT OF CERTIORARI

Anthony Lonnie Forbes
(Your Name)

1337 Coral Pl
(Address)

Hampton, VA, 23669
(City, State, Zip Code)

757 376 0335
(Phone Number)

ORIGINAL

QUESTION(S) PRESENTED

1. Where the U.S. Supreme Court has ruled that Section 1981 of the Civil Rights Act of 1866 prohibits racial discrimination in contractual relationships, to include employment and provides protection from unlawful retaliation, to what extent is the use of the Federal Arbitration Act ("FAA") Unconstitutional?

2. While the Civil Rights Act of 1866 (42 U.S.C. Section 1981) provides protection against retaliation in contractual relationships, to include employment, under what circumstances can retailation continue beyond a employment relationship and a second Complaint be barred by res judicata?

3. Where the U.S. Supreme Court has ruled that Section 1981 of the Civil Rights Act of 1866 prohibits racial discrimination in contractual relationships, to include employment and provides protection from unlawful retaliation, if an employee shares a employment relationship with two entities, where there is a contractual agreement to arbitrate with one entity but not a contract with the other, can the Federal Arbitration Act ("FAA") be used by both entities? (No contract but still supervisor)

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:

Anthony Lonnie Forbes was the sole petitioner in the court of appeals and in this Court, which was the Plaintiff below

Both Seaworld Entertainment, INC and The Blackstone Group, L.P., were respondents in the court of appeals and in this Court, which were the Defendants below

Related Cases

- *Forbes v. Seaworld Entertainment, INC., et al.,* No. 4:19-cv-56, U.S. District Court for the Easter District of Virginia. Judgment entered Feb 14, 2020

- *Forbes v. Seaworld Entertainment, INC., et al.,* No. 20-1208, U.S. Court of Appeals for Fourth Circuit. Judgement entered Aug 18, 2020

- *Forbes v. Seaworld Parks & Entertainment,* No. 4:16-cv-172, U.S. District Court for the Easter District of Virginia. Judgment entered Jun 5, 2017

- *Forbes v. Seaworld Parks & Entertainment,* No. 17-1795, U.S. Court of Appeals for Fourth Circuit. Judgement entered Dec 27, 2017

Table of Contents

INDEX TO APPENDICES

TABLE OF AUTHORITIES

Page(s)

Cases

Schramek v. Jones, 161 F.R.D. 119, 122 (M.D. Fla. 1995)

Susan Boggs, et al. v. City of Cleveland, 655 F.3d 516 (6th Cir. 2011).

Sussman v. Salem, Saxon and Nielsen, P. A., 150 F.R.D. 209, 213 (M.D. Fla. 1993).

Tripoti v. Beamon, 878 F.2d 351, 353 (10th Cir. 1989)

Vance v. Ball State Univ., 570 U.S. 421, 431, 133 S. Ct. 2434, 2443, 186 L. Ed. 2d 565 (2013)

Constitutions and Statutes

9 U.S.C.A. § 3

U.S. Code § 1512.

18 U.S. Code § 1001

18 U.S. Code § 1621 Perjury generally

28 U.S.C § 1927

42 U.S.C. § 1981

Title VII of the 1964 Civil Rights Act (Title VII), as codified, 42 U.S.C. §§ 2000e-17(race, color, gender, religion, national origin).

U.S. Const., art. 13, § 1

U.S. Const., art. 14, § 1

Virginia Human Rights Act § 2.2-3900-03

Rules

Rule 11(b) of the Federal Rules of Civil Procedure

Sup. Ct. R. 10(a)

IN THE

SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

[✓] For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix 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 appears at Appendix B 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 _____ to the petition and is

[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[ ] is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[ ] is unpublished.

JURISDICTION

[✓] For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was Aug 18, 2020.

[ ] 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: Oct 13, 2020, and a copy of the order denying rehearing appears at Appendix _____.

[ ] An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ___A_____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

[ ] For cases from **state courts**:

The date on which the highest state court decided my case was _____. A copy of that decision appears at Appendix _____.

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

[ ] An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. ___A_____.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Section 1 of the Thirteenth Amendment to the U.S Constitution, provides:

Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction.

Section 1 of the fourteenth Amendment to the U.S. Constitution, provides:

All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state 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.

42 U.S.C. § 1981provides:

All persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts, to sue, be parties, give evidence, and to the and equal benefit of all laws and proceedings for the security of persons and property as is enjoyed by white citizens, and shall be subject to the like punishment, pains, penalties, taxes, licenses, and exactions of every kind, and to no other.

Title VII of the 1964 Civil Rights Act (Title VII), as codified, 42 U.S.C. §§ 2000e-17(race, color, gender, religion, national origin).

Virginia Human Rights Act § 2.2-3900-03 provides:

Virginia's Human Rights Act outlines the policy of the Commonwealth to "[s]afeguard all individuals within the Commonwealth from unlawful discrimination because of race, color, religion, national origin, sex, pregnancy, childbirth or related medical conditions, age, marital status, or disability, places of public accommodation," including in education, real estate, and employment. The Act defines the "unlawful discriminatory practice" and gender discrimination" as conduct that violates any Virginia or federal statute or regulation governing discrimination based on race, color, religion, national origin, sex, pregnancy, childbirth or related medical conditions, age, marital status, or disability. The terms "because of sex or gender" or "on the basis of sex or gender" or similar terms in reference to discrimination in the Code and acts of the General Assembly include pregnancy, childbirth or related medical conditions shall be treated the same for all purposes as persons not so affected but similar in their abilities or disabilities.

STATEMENT OF THE CASE

This case presents opportunities for the Court to address complex issues regarding statutory standing of Title VII of the Civil Rights Act of 1964 ("Title VII"), 42 U.S.C. § 1981 and in essence, the Virginia Human Rights Act. The respondents used not only illegal but unconstitutional tactics in their reply to the petitioners' Complaint and attempt to arbitrate harassment-free, thus eliminating the petitioners' right to due process. The Court has the authority to clarify the scope of the Federal Arbitration Act ("FAA") and determine its constitutionality and the proper use of res judicata. As explained by the petitioner and then Plaintiff, he was sexually harassed and reported the inappropriate conduct. Eventually, an investigation was conducted, which caused a snowball effect and the Plaintiff was physically assaulted by a Vice-President. After going to the police the petitioner was fired. A Member of Seaworld (Lawyer) contacted the police department and told the police that there was an incident but the result of the investigation was inconclusive despite being told by a witness that the assault did happen and the police report was not done properly (Obstruction of Justice). Therefore, from the inception of the police report there has been no due process. As the Court may know, the statute of limitation obstruction of justice doesn't actually start until one stops obstructing justice.

Where the U.S. Supreme Court has ruled that Section 1981 of the Civil Rights Act of 1866 prohibits racial discrimination in contractual relationships, to include employment and provides protection from unlawful retaliation, to what extent is the use of the Federal Arbitration Act ("FAA") Unconstitutional?

The power to contract is extremely broad, but that doesn't mean the power is limitless. You can't contract to perform illegal activities and you certainly can't contract away constitutional rights. Contracts that are unconscionable are not enforceable. Fundamentally, it is not reasonable to ask someone not to go to the police after being physically assaulted at work because they signed a contract with their employer. In addition, it also is not reasonable for employees of a company to give false statements to the police. Lying to the police is illegal and not covered by any DRP or Arbitration agreement. When the Plaintiff-petitioner went to the police to file a police report, truthful statements should have been given to the police; hence a truthful police report should have been generated and been available for evidence. It is not reasonable to expect the petitioner to arbitrate without truthful evidence that should be present. By giving the police false information alone violated the petitioner's civil rights. 42 U.S.C. § 1981provides that petitioner has the right to give evidence. Additionally, the Court should have all evidence to legally determine if all the present issues are arbitrable. "[I]f a court determines 'that all of the issues presented are arbitrable, then it may dismiss the case'" *Hawthorne,* 2016

U.S. Dist. LEXIS 114969, at *19 (quoting *Greenville Hosp. Sys. V. Welfare Ben. Plan for Emps. Of Hazelhurst Mgmt.* Co., 628 F. App'x 842, 845-46 (4th Cir.2015)); *see also Choice Hotels Int'l, Inc v. BSR Tropicana Resort, Inc.,* 252 F.3d 707, 709-10 (4th Cir. 2001), this was not the case for this case or the original Complaint. The petitioners' first case was dismissed without all of the evidence being presented to the Court due to the respondent's illegal conduct. The use of Seaworld's Dispute Resolution Program and contract to arbitrate is unconstitutional for many reasons. Using this case for example, would allow one's boss to hit them and legally get away with it, with no limitations, an unwelcoming environment at work could turn violent and lead to much more serious incidents.

Seaworlds' DRP requires employees to waive certain rights and to agree to "and to accept an arbitrator's decision as the final, binding and exclusive determination of all covered claims." The language that is used in Seaword's Dispute Resolution literally calls for unlawful or illegal conduct "Claims relating to or arising out of the employment relationship that:... B. 'the Employee may have against the Company and/or any individual employee who is acting within the scope of his or her employment with the Company, where the Employee alleges unlawful termination and/or unlawful or illegal conduct on the part of the Company'" If Seaworlds' policy were to stand, it would allow for a Seaworld Employee to hit another employee (as in this case) but not allow the victim to go to the Courts to get a protection order or restraining order against the person that hit them. Because it was the petitioner's boss, this action is no different than the slavery that was abolished by the 13th amendment. As the Court may know, violent incidents that are started at work, can and frequently do, carry on outside of work, and can escalate quickly. The Courts have widely ruled that Title VII's anti retaliation provision is not limited to the actions affecting employment or those occurring at work, and can extend to actions causing harm outside the workplace. Therefore, it is not reasonable to ever require seaworlds' DRP or arbitration over public safely. With the combination of the respondent lying to police (obstructing justice) and preventing employee's from legally protecting themselves (requiring arbitration when an employee does something unlawful or participates in illegal conduct on the part of the Company), it is easy to see that the use of the Federal Arbitration Act ("FAA") can not only be unconstitutional but is unconstitutional. There is a clear conflict between the Civil rights that are guaranteed by 42 U.S.C. § 1981provides, Title VII of the 1964 Civil Rights Act (Title VII), Virginia Human Rights Act § 2.2-3900-03 and the Federal Arbitration Act ("FAA")

While the Civil Rights Act of 1866 (42 U.S.C. Section 1981) provides protection against retaliation in contractual relationships, to include employment, under what circumstances can retailation continue beyond a employment relationship and a second Complaint be barred by res judicata?

The Respondents participated in actions that kept the petitioner from bringing evidence to the Courts and to any DRP arbitration process as explained above. However, the Respondents also participated in witlessness intimidation during separate but related state cases before the federal complaint process was over. It was unlawful to threaten the then Plaintiff, putting him in fear of his life but also done to prevent the petitioner from binging evidence to the Court. Dismissing the petitioners Complaint in the lower courts, the petitioners interrogatories went unanswered, which would have connected Jimmy Robinson, Lieutenant Governor Justin Fairfax and Senator Kamala Harris and the respondents to causes of actions that are employment related. Once again the Courts have widely ruled that Title VII's anti retaliation provision is not limited to the actions affecting employment or those occurring at work, and can extend to actions causing harm outside the workplace. Seaworld and their associates would go on to commit more threats and harassment throughout the whole legal process.

In filing the Defendants' Motion to Dismiss, Jimmy F. Robinson, Jr. violated Rule 11(b) of the Federal Rules of Civil Procedure (*see* **motion for sanctions)** In order to get to The Defendants' flawed defense, Mr. Robinson simply lied. The Defendants' Motion to Dismiss does not meet the requirements of the Federal Rules of Procedure and therefore, should not have been granted under Rule 12(b)(6). The Plaintiff believes that the then defendants violated 18 U.S. Code § 1621 Perjury generally, but has did so in a way that falsifies, conceals, or covers up by any trick, scheme, or device a material fact; makes any materially false, fictitious, or fraudulent statement or representation; or makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry, a violation of 18 U.S. Code § 1001, a violation of U.S. Const., art. 14, § 1. Rule 11 allows a court to impose sanctions on a party who has presented a pleading, motion or other paper to the court without evidentiary support or for "any improper purpose." *See* Fed. R. Civ. P. Rule 11 (b). An improper purpose may be inferred from the filing of frivolous papers. *See In re Kunstler*, 914 F. 2d 505, 518 (4th Cir. 1990). The standard is an objective one; whether a reasonable party would have acted in a particular way. *See Chambers v. NASCO Inc.,* 501 U.S. 32, 47 (1991). "The reasonableness of the conduct involved is to be viewed at the time counsel or the party signed the document alleged to be the basis of the Rule 11 sanction." *Sussman v. Salem, Saxon and Nielsen, P. A.,* 150 F.R.D. 209, 213 (M.D. Fla. 1993). The purpose of Rule 11 sanctions is to "reduce frivolous claims, defenses, or motions, and to deter costly meritless maneuvers." *Massengale v. Ray*, 267 F.3d 1298, 1302 (11th Cir. 2011); *see also, Sussman,* 150 F. R. D at ("this Court recognizes Rule 11's Objectives, which include: (1) deterring future litigation abuse, and (2) punishing present litigation abuse, (3) compensating victims of litigation abuse, and (4) streamlining court dockets and facilitating case management"). In the Eleventh Circuit, "three (3) types of conduct warrant Rule 11 sanctions: (1) when a party files a pleading that has no reasonable factual basis; (2) when a party files a pleading that is based on legal theory that has no reasonable chance of

success and that cannot be advanced as reasonable argument to change existing law; and (3) when a party files a pleading in bad faith or improper purpose." *Didie v. Howes,* 988 F. 2d 1097 (11th Cir. 1993) (citations omitted). Rule 11 are **mandatory** when a signed paper is submitted to the court under the aforementioned conditions. *See Schramek v. Jones*, 161 F.R.D. 119, 122 (M.D. Fla. 1995) (emphasis added). Although Rule 11 specifically contemplates sanctions in the form of an award of attorneys fees, the award of fees "is but one of several methods of achieving the various goals of Rule 11." *See Doering v. Union County Bd. Of Chosen Freeholders,* 857 F.2d 191, 194 (3rd Cir. 1988). In fact, Rule 11 states that the nonmonetary directives." *See* Rule 11(c)(4). Numerous courts have held that injunctive sanctions are appropriate to regulate the activities of abusive litigants. *See Christensen v. Ward,* 916 F.2d 1485 (10th Cir. 1990); *see also Tripoti v. Beamon,* 878 F.2d 351, 353 (10th Cir. 1989); *Merrigan, Supra; In re Green,* 669 F.2d 779, 781-85 (D.C. Cir 1981); *Franklin v. Murphy*, 745 F. 2d 1221, 1229-36 (9th Cir. 1984); *Ruderer v. United States, 462* F.2d at 899 n.2 (listing cases); *In re Martin-Trigona,* 737 F.2d 1254, 1264-74 (2d Cir. 1984). Rule 11 does not enumerate factors a court should consider in deciding the appropriate sanction for a Rule 11 violation. *See* Fed. R. Civ. P.11 Advisory Committee Notes (1993). Rather, a trial court has broad discretion to choose the nature and amount of the sanction to achieve the deterrent purposes of Rule 11. *See DiPaolo v. Moran*, 407 F.3d 140, 146 (3rd Cir. 2005). In this current matter, monetary sanctions together with injective sanction are appropriate.

Mr. Robinson and the Defendant's claims made in its Motion to dismiss are not only frivolous, but also a form or retaliation. The desire to punish the Plaintiff, who is a former employee and to deter others from taking similar measures is appalling. This desire to punish the Plaintiff for engaging in protected activity (i.e. filing a lawsuit), and deter others from acting similarly, **is** what makes it retaliation. *See Brissette v. Franklin County Sheriff Office*, 235 F. Supp. 2d 63 (D. Mass 2003). Legal proceedings, to include counterclaims, can constitute actionable retaliation if they are filed against an employee in response to the employee asserting statutory workplace rights. *See, e.g., Jacques v. DiMarzio, Inc.*, 216 F. Supp. 2d 139, 141-43 (E.D.N.Y. 2002) (defendant's counterclaims found sua sponte to be retaliatory, dismissal and sanctions issued sua sponte); *Gliatta v. Tectum, Inc.*, 211 F. Supp. 2d 992, 1008-09 (counterclaim alleged to be retaliatory) (citing *EEOC v. Outback Steakhouse of Florida, Inc.*, 75 F. Supp. 2d 756 (N.D. Ohio 1999) (same)); *Cozzi v. Pepsi-Cola Gen. Bottlers, Inc.*, No. 96 C 7228, 1997 WL 312048, at *3 (N.D. Ill. 1997) (State court fraud lawsuit alleged to be retaliatory). Although allegations contained within legal pleadings are protected by an absolute privilege under the law of defamation, the Supreme Court has long recognized that the Constitution does not protect the assertion of frivolous legal claims, and that such action can constitute actionable retaliation. *Bill Johnson's Restaurants, Inc. v. NLRB*, 461 U.S. 731 (1983) (holding that the NLRB may enjoin a baseless lawsuit that is brought for retaliatory reasons).

When Mr. Robinson threatened to shoot the Plaintiff, it was a form of Obstruction of Justice, U.S. Code § 1512. Tampering with a witness, victim, or an informant. Putting the

Plaintiff in fear of his life and stopping the Arbitration process altogether is and was out of the scoop of employment.

In addition to the violations of Rule 11(b) of the Federal Rules of Civil Procedure, it is the Plaintiff's notion that Jimmy F. Robinson has violated 28 U.S.C § 1927 by multiplying the proceedings unreasonably and vexatiously.

The lower Courts dismissed the petitioners Complaint stating that all of the claims were the same or identical to the petitioners first Complaint. However, the harassment was a continuation of the earlier conditions that had worsened with new facts. As the Supreme Court explained more than 60 years ago in *Lawlor v. National Screen Service Corp.*, 349 U.S. 322 (1955), res judicata does not bar a suit, even if it involves the same course of wrongful conduct as alleged earlier, so long as the suit alleges new facts or a worsening of the earlier conditions. Even if all of Plaintiffs' claims were considered to arise from the same conduct and occurrences, which they do not, with the right new facts, res judicata does not bar a second suit. *See In re State of Ohio ex rel. Susan Boggs, et al. v. City of Cleveland*, 655 F.3d 516 (6th Cir. 2011). The ongoing threats and harassment towards the petitioner and his family did not stop when the current Complaint was filed; the respondents continued their actions throughout the appeal process. Despite being given Cease and Desist letters, the respondents continued to gang up on the petitioner to include the use of government officials.

Where the U.S. Supreme Court has ruled that Section 1981 of the Civil Rights Act of 1866 prohibits racial discrimination in contractual relationships, to include employment and provides protection from unlawful retaliation, if an employee shares a employment relationship with two entities, where there is a contractual agreement to arbitrate with one entity but not a contract with the other, can the Federal Arbitration Act ("FAA") be used by both entities? (No contract but still supervisor)

There is no arbitration agreement with The Blackstone Group. **Stephen A. Schwarzman was the Plaintiff's supervisor**. The Blackstone CEO Stephen A. Schwarzman was David D'Alessandro's supervisor who in return, was the Plaintiff's Anthony Lonnie Forbes's supervisor. 42 U.S.C. § 1981 specifically, states that individuals such as supervisors, as well as

business entities can be sued under Section 1981. In Fact, as Mr. Robinson stated "Under Settled precedent, a supervisor must be able to "effect significant change in employment status, such as hiring, firing, failing to promote, reassignment with significantly different responsibilities, or a decision causing a significant change in benefits/" *Vance v. Ball State Univ.*, 570 U.S. 421, 431, 133 S. Ct. 2434, 2443, 186 L. Ed. 2d 565 (2013). The Blackstone Group not only owned the Majority of shares of Seaworld but also employed David D'Alessandro. The Shareholders (The Blackstone Group) had complete control over David D'Alessandro and the Seaworld Entertainment Inc. Directors such as David D'Alessandro appoint- and can fire-upper managers such as the CEO and president, the chairman typically wields substantial power in a company. Because The CEO cannot make any major moves without the board's assent, and his or her job security depends on their satisfaction, the chairman is his or her superior. In Short, the boss of the petitioner's boss is still his boss. There is no enforceable contract with The Blackstone Group yet, Stephen A. Schwarzman was the petitioner's supervisor. Notwithstanding the fact that the Federal Arbitration Act ("FAA") was used in an unconstitutional way in the first place, the Complaint should not have been dismissed because there was no contract with the one of the respondents.

REASONS FOR GRANTING THE PETITION

There have been several crimes committed by government officials. If these crimes go unpunished the officials will strike again.

A person's Civil Rights are not only vital to live in a functional society, but where made to protect individuals. If we allow Civil Rights to be violated America will drown in chaos.

As the Supreme Court explained more than 60 years ago in *Lawlor v. National Screen Service Corp.*, 349 U.S. 322 (1955), res judicata does not bar a suit, even if it involves the same course of wrongful conduct as alleged earlier, so long as the suit alleges new facts or a worsening of the earlier conditions.

The power to contract is extremely broad, but that doesn't mean the power is limitless. You can't contract to perform illegal activities and you certainly can't contract away constitutional rights. Contracts that are unconscionable are not enforceable

While the Civil Rights Act of 1866 (42 U.S.C. Section 1981) provides protection against retaliation, it also gives parties the right to give evidence in a Court.

The Federal Arbitration Act ("FAA") is unconstitutional, especially when used to cover-up a crime.

There was no agreement to arbitrate with The Blackstone Group however, 42 U.S.C. § 1981 specifically, states that individuals such as supervisors, as well as business entities can be sued under Section 1981.

The truth is that the petitioner was attacked for lawfully going to the police after he was struck at work and for defending his civil rights. Kamala Harris was warned before it got to this point that there was a conflict of interest by way of a cease and desist letter from the petitioner, yet her threats and harassment kept coming. Kamala Harris was not a legitimate presidential candidate and does not deserve to step one foot into the white house as a vice president for one second. Kamala Harris does not represent the ethical values that I want associated with me. I do not support her (as I have stated many times before) in any shape or form. Kamala Harris has committed multiple crimes along with her many associates and has not only put me and my family in danger, but America as well. For example, I am not against a woman of color being the next vice president, just her. Yet, she and many of her associates will push the narrative that the petitioner is getting in the way of progress. In actuality, the petitioners' lawsuit was never about her, she and her associates just selfishly made it about them, even after they knew that the Civil Rights Act of 1866 (42 U.S.C. Section 1981) was in danger and a serious challenge to the Federal Arbitration Act ("FAA") was in progress, they are complicit in trying to cover-up the respondents poor behavior. Without civil rights it is doubtful that Kamala Harris would have ever been elected as a U.S. Senator in the first place and it is well known that what Susan B. Anthony did for America. The bottom line is that it is dangerous to put Kamala Harris in such a high position of power knowing that our enemies will be able to use her past actions against her as leverage. In addition her associates should be taken out of their positions of power as well. The petitioner does not feel safe with them in their positions and America should not as well.

On January 6, 2021 America was attacked and I fear that more is to come because you can only tell people not to believe their lying eyes to a certain point. Kamala Harris does not deserve a path to be President of the United States; the respondents should pay for the damage they have caused and many of their associates must take responsibility for what their actions done and what would have happened had the petitioner not took action. I must know that the petitioner is not their political tool and they do not have control that they thought they had. It is for these reasons that I ask this Court to not grant the petition for writ of certiorari but to review all documents, to include the restraining orders that were requested in the lower courts.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Anthony L Forbes

Date: 1/9/2021