

20-820

NO. 19-1446-CV

ORIGINAL

SUPREME COURT OF THE UNITED STATES

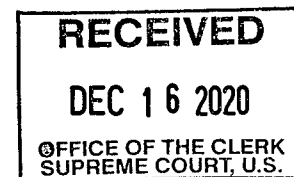
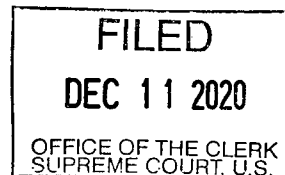
DENISE JACKSON
PETITIONER,

V.

WELLS FARGO HOME MORTGAGE,
RESPONDENT.

PETITION FOR A WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS
FOR THE SECOND CIRCUIT

DENISE JACKSON-PRO SE
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LIST OF PARTIES

1 UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

HONORABLE JUDGE, PAMELA CHEN

HONORABLE MAJISTRATE, STEVEN TISCIONE

2 UNITED STATES COURT OF APPEALS FOR THE SECOUND CIRCUIT

HONORABLE JUDGE: DENNY CHEN

HONORABLE JUDGE: RICHARD J. SULLIVAN

HONORABLE JUDGE: WILLIAM J. NARDINI

3 WELLS FARGO HOME MORTGAGE:

ATTORNEY ANDREW B. MISITE % REED SMITH

4 HOGAN LOVELLS US LLP:

ROBIN L. MUIR, ASSOCIATE

LISA FRIED

FEDERAL QUESTIONS

Background

I submitted a preponderance of documentary evidence that proves that I was not only qualified for all three federally funded programs the approval was generated by Wells Fargo, the FHA/ HUD.

Is evidence the rule of law a part of our constitution ?

Does the court have the right to choose who benefits from the constitutional protections?

Is the court supposed to rule in my favor because my evidence substantiates my complaint?

Background

My intinal complaint was a proper and valid complaint siting discrimination in federally funded programs. A meeting was scheduled on October 23, 2015 where I was not consulted, notified or invited. No where on the calendar was it ordered that anyone was Advise me of the meeting nor did anyone call my home. Then the judge grants Wells Fargo a motion to dismiss when they notified me of the date and time I would have produced my evidence, the 9 page approval letter which I stated in my complaint, and Wells Fargo would not have been granted a motion to dismiss. The meeting was held on October 29,2015 ,6 days later.

Is this a violation of due process rights for the civil proceedings?

Is this a violation of the FRCP ? I'm supposed to have 14 days notice before scheduling a hearing that I have proper time to prepare?

Was the Judge suppose to confirm the hearing date with me before scheduling the hearing To ensure I was available?

Is this fair and impartial treatment or discriminatory treatment?

Are the Judge and the opposing side allowed to communicate without my presence?

TABLE OF AUTHORITIES

CONLEY V. GIBSON 355 U.S. 41 AT 48 (1957)

HAINES V. KERNER, 404 U.S. 519 (1972)

JENKINS V. MCKEITHEN, 395 U.S. 411, 421 (1959); PICKING V. PENNSYLVANIA R. CO, FED 2ND; PUCK V. COX, 456 2ND 233

BOYD V. UNITED STATES, 116 U.S. 616 AT 635 (1885)

JUSTICE BRADLEY,

"... IT IS THE DUTY OF THE COURTS TO BE WATCHFUL FOR THE CONSTITUTIONAL RIGHTS OF THE CITIZENS, AND AGAINST STEALTHY ENCROACHMENTS THEREON, THEIR MOTTO SHOULD BE OBSTA PRINCIPIIIS."

ELMORE V. McCAMMON (1986) 640 F. SUPP. 905

THE RIGHT TO FILE A LAWSUIT PRO SE IS CONSTITUTIONAL LAW!

DUNCAN V. MISSOURI, 152 U.S. 377, 382 (1894)

DUE PROCESS UNDER THE LAW EQUAL PROTECTION OF THE LAW.

BUTZ V. ECONOMOU, 98 S. CT. 2894 (1994); UNITED STATES V. LEE, 106, U.S. AT 1 S. CT. AT 261 (1882)... "NO MAN OR WOMAN IN THIS COUNTRY IS SO HIGH THAT HE IS ABOVE THE LAW"... "NO OFFICER OF THE LAW MAY SET THE LAW AT DEFIANCE WITH IMPUNITY".

"... ALL GOVERNMENT FROM HIGHEST TO THE LOWEST ARE CREATURES OF THE LAW, AND BOUND BY THE LAW".

NOTE: COPIED VERBIAGE; WE ARE NOT LAWYERS.]..." IT CAN BE ARGUED THAT TO DISS A CIVIL RIGHTS ACTION OR OTHER LAWSUIT IN WHICH A SERIOUS FRACTAL PATTERN OR ALLEGATION OF A CAUSE OF ACTION HAS BEEN MADE WOULD IT SELF BE VIOLATION OF PROCEDURAL DUE PROCESS AS IT WOULD DEPRIVE A PRO SE LITIGANT OF EQUAL PROTECTION OF THE LAW VIS A VIS PARTY WHO REPRESENTED BY COUNSEL".

TRINSEY V. PAGLIARO D.C. (1964) 229 F. SUPP 647" STATEMENTS OF COUNSEL IN BRIEF OR ARGUMENTS ARE NOT FACTS AND THEREFORE INSUFFICIENT FOR A MOTION TO DISMISS OR SUMMARY OF JUDGEMENT".

PLATSKY V. C.I.A./ F.B.I " JUDGE MUST TELL A PRO SE LITIGANT HOW TO AMEND HIS LAWSUIT SO IT CAN GO FORWARD".

CONSTITUTIONAL PROVISIONS

14TH ADMENDENT TO THE CONSTITUTION- EQUAL RIGHTS

7TH ADMENDENT UNDER BILL OF RIGHTS- RIGHT TO A JURY TRIAL

STATUTORY PROVISIONS

FRAUD ON THE COURT

42 U.S.1981- EQUAL RIGHTS UNDER THE LAW-

42 U.S.2000d-1 FEDERAL ASSISTED PROGRAM

18 U.S. 242 DEPRIVATION OF RIGHTS UNDER COLOR OF LAW

18 U.S.C. 100-SEC1001- MAKING FALSE STATEMENTS/ CONCEALING
INFORMATION

FEDERAL HOUSING ACT LAW- TITLE 8 OF THE CIVIL RIGHTS OF 1968-
SECTION 805-REDLINING/ EQUAL CREDIT OPPORTUNITY ACT-3605/
3602 /3631

RULES

FEDERAL RULE OF CIVIL PROCEDURE # 1 SPEEDY DETERMINATION

FEDERAL RULE OF CIVIL PROCEDURE # 8- PLEADING INSTRUCTIONS/
STANDARD.

FED R. APP. RULE 40- PANEL -REHEARING

LOCAL APP. RULE 40.1-

FED R. OF APP. # 41- ISSUEANCE OF MANDATE

STATEMENT OF JURISDICTION

THIS IS THE PROPER JURISDICTION BECAUSE IT DERIVED FROM THE U.S. FEDERAL COURT OF THE EASTERN DISTRICT OF NEW YORK . THE UNITED STATES COURT OF APPEALS OF THE SECOND CIRCUIT DATE OF LAST DECISION IS JULY 14, 2020.

THIS IS TIMELY RULE # 14 WITH THE EXTENSION DUE TO THE COVID- 19, PANDEMIC.

THE COURT DRAWS ITS JURISDICTION FROM 28 U.S.C.1254(1).

INTRODUCTION

Honorable Justices of the U.S. Supreme Court,

I Denise Jackson, Petitioner Pro Se, respectfully request your consideration to review my case case #19-1446-cv decision from the U.S. court of appeals second circuit dated April 24,2020.

This is a presidential case that not only affects me, but it affects many other american citizens as the constitutional protections that I was denied, as well as being a very serious threat to our constitution and our democracy.

The District Court dismissed my complaint three and a half years in the pleading stage for 12b6 And concluded I was not qualified for 2012,2013, or 2014 loans excluding all the vital documentary evidence that clearly states I was approved and qualified by the defendants wells Fargo own underwriters, federal housing administration, as well as hud endorsement and approval. I further submitted evidence from the U.S. Treasury eligibility for the modification Federal program. All the loans were federally funded loan programs in which I was qualified And approved.

I had two private lawyers that did not protect my rights and defend my complaint.They refused to submit and argue my very important documentary evidence which was submitted to the district court that was not examined, argued or presented to the Appellate Court. The appellate Court did not come to the right finding of fact without all of my evidence that I submitted to the District Court.

Immediately following the termination of the lawyers I submitted 2 motions to the appellate court Pro SE, including the hard copy of the termination letter, and the response timely and prior to the issuance of the mandate showing the vital evidence as wells as when and where it was submitted to the District Court on the calendar as well as copies of my submissions that shows The same evidence to the appellate court.

I'm trying to find a competent professional experienced Attorney to represent me in this court but it has been difficult as we are in the middle of a pandemic, shut down and many of the Lawyers don't have offices to work from and I can't interview face to face. I am high risk for the Virus and I must stay safe for my family. I will retain a lawyer to take over this case as soon as possible.

I will argue the decisions of the District Court, as well as the decision of the appellate to prove The violations of the federal laws, deprivation of the constitutional laws as well as violation of The rule of law which is evidence. I will argue the error of the laws has been made and justice has not been serviced.

STATEMENT OF CASE

ON AUGUST 27TH 2015 I DENISE JACKSON- PRO SE FILED A LAWSUIT AGAINST WELLS FARGO HOME MORTGAGE FOR DISCRIMINATION IN FEDERALLY FUNDED PROGRAMS.

WITHIN MY INITIAL PLEAD PAGE #2 I ADVISED THE COURT OF MY EVIDENCE A 9 PAGE APPROVAL LETTER GENERATED BY THE DEFENDANT WELLS FARGO HOME MORTGAGE.

ON SEPTEMBER 3, 2015 MY CASE WAS REASSIGNED TO HONORABLE JUDGE, PAMELA CHEN.

OCTOBER 14, 2015 WELLS FARGO ATTORNEY, ROBIN MUIR, WROTE A PERSONAL LETTER TO JUDGE CHEN, WHICH I NEVER SAW AND NEVER RECEIVED A COPY OF PAGE ONE, MS. MUIR, PREJUDICE THE JUDGE BY STATING" PLAINTIFF IS AN INDIVIDUAL RESIDING IN NEW YORK STATE". .. WELLS FARGO IS A NATIONAL ORGANIZATION BANKING ASSOCIATION ORGANIZED IN THE UNITED STATES OF AMERICA." EXHIBIT (I) MS. MUIR THEN PROCEEDED TO MAKE FALSE STATEMENT TO THE COURT BY ADVISING THE COURT THAT I WAS IN DEFAULT ON MY MORTGAGE PAGE # 3 OF THIS 3 PAGE LETTER AND MY CLAIM FOR SECTION 3605 FEDERAL HOUSING LAW DID NOT COUNT AS A REAL ESTATE TRANSACTION". THIS IS DEMONSTRATIVELY FALSE, SEE COPY OF MY MORTGAGE PAYMENT CHECK ATTACHED TO THIS EXHIBIT DATED JUNE 2017 \$ FOR 2,900, TO WELLS FARGO HOME MORTGAGE. THIS DEFAMING MY CHARACTER. I WAS NEVER DEFAULT ON MY MORTGAGE ACCOUNT. THIS WAS TO DISQUALIFY THE F.H.A. CLAIM 3605.

THERE WAS A PRE CONFERENCE SCHEDULED I WAS NOT CONSULTED ABOUT, INVITED I WAS NOT NOTIFIED OF THE MEETING, NOR WAS I GIVEN THE MINUTES OF THIS HEARING OR THE OPPORTUNITY TO PRESENT MY 9 PAGE LOAN APPROVAL DOCUMENT. I WAS DEPRIVED OF MY RIGHT TO BRING FORTH MY EVIDENCE TO DEFEND MY COMPLAINT. WELLS FARGO WAS GRANTED A MOTION TO DISMISS.

I ATTENDED A SETTLEMENT CONFERENCE PRIOR TO SUBMITTING MY OBJECTION TO WELLS FARGO'S MOTION TO DISMISS. I PRESENTED ALL OF MY DOCUMENTARY EVIDENCE TO THE MAGISTRATE JUDGE, HONORABLE STEVEN TISCIONE, BUT WELLS FARGO WAS ALLOWED A MOTION TO DISMISS. MY EVIDENCE THE APPROVAL DOCUMENT PROVED THE FEDERAL LAWS WAS VIOLATED.

FEBRUARY 8, 2016 I SUBMITTED MY OBJECTION WITH MY PREPONDERANCE OF EVIDENCE, EXHIBIT 1-5 ON THE CALENDAR, BUT THE DOCUMENTS WERE NOT

CALENDARED TITLED, AS EACH DOCUMENT HAS BOLD TITLE TRUTH IN LENDING DOCUMENTS FOR BOTH 2012, AND 2014 LOANS, AS WELL AS THE U.S. DEPARTMENT OF TREASURY QUALIFICATIONS FOR THE 2013 MODIFICATION.

ALL OF THIS DOCUMENTARY EVIDENCE WAS RESTRICTED ON THE EFILE SYSTEM AND NO ONE COULD VIEW MY EVIDENCE. NO COURT ORDER IS ON THE CALENDAR, AND MY EVIDENCE, EXHIBIT 1-5 WAS MISSING FROM THE EFILE SYSTEM FOR 36 DAYS, IT'S TIME STAMP RECEIVED DATE DID NOT SHOW UP UNTIL MARCH 14, 2016 THE SAME DAY THAT WELLS FARGO BRIEFED MOTION TO DISMISS MARCH 14, 2016 WAS RECEIVED AND ENTERED THE SAME DAY. MY EVIDENCE WAS CONCEALED, TAMPERED WITH, SPOILED BY THE COURT.

MY CASE SAT IN THE FEDERAL IN THE PLEADING STAGE FOR 3 ½ YEARS WHILE THE STATUE OF LIMITATION RAN OUT ON 2012 LOAN, AND THE 2013 MODIFICATION. MY CASE WAS DISMISSED IN 2019 FOR 12 (B)(6) WHILE THE MAGISTRATE JUDGE CONCLUDED I WAS NOT QUALIFIED FOR THE 2012, 2013, AND PROBABLY 2014 LOANS WITHOUT SHOWING THE EVIDENCE SUBMITTED DID NOT SUPPORT MY QUALIFICATION NOR HAD ANY OTHER EVIDENCE TO SHOW I WAS NOT QUALIFIED. SEE APPENDIX (B) 1 PAGE MAGISTRATE'S CONCLUSION, BUT FAILED TO SHOW HOW MY APPROVAL DOCUMENTS GENERATED BY WELLS FARGO, FHA, AND HUD, DID NOT VALIDATE, SUBSTAINIATE MY COMPLAINT.

I RETAINED A PRIVATE ATTORNEY, PETER SVERD, REAL ESTATE MANHATTAN NEW YORK, TO DEFEND MY CASE IN THE APPELLATE, BUT HE FAILED, AND REFUSED TO PRESENT MY TRUTH IN LENDING FEDERAL DOCUMENTS, MY GOOD FAITH ESTIMATE DOCUMENTS, MY DEPARTMENT OF TREASURY QUALIFICATION DOCUMENTS AND ARGUE THEM IN THE APPELLATE COURT. MR. SVERD DIDN'T EVEN ADVISE THE COURT THAT THE EVIDENCE WAS NOT ON THE EFILE SYSTEM, AS HE TOLD ME, AND THAT THE EVIDENCE EXISTED, HE WAS GIVEN ALL MY EVIDENCE WHEN I RETAINED HIS SERVICES. MR. SVERD, WHEN THE JUDGE ASKED HIM WAS I QUALIFIED, HE FAILED TO SAY YES, AND PRESENT THE APPROVAL DOCS GENERATED BY THE DEFENDANT WELL FARGO. MR. SVERD, REFUSED TO MEDITATE AT THE 3 HOUR MANDATORY MEDIATION, HE NEVER ASKED WELL FARGO ATTORNEY ONE QUESTION. MR. SVRED RAN OUT OF THE MEDIATION LESS THAN 10 MINUTES OF ARRIVING, AND REFUSED TO RETURN TO FACE WELLS FARGO ATTORNEY FACE TO FACE TO EFFECT A RESPECTFUL SETTLEMENT.

MR. SVRED, ABANDONED ME AFTER THE APPELLATE COURT DECISION, AND REFUSED TO REQUEST A REHEARING TOLD ME I WOULD NOT BE SUCCESSFUL IF I REQUESTED KNOWING THE APPELLATE DECISION WAS MADE WITHOUT EXAMINING MY EVIDENCE TO SHOW WELLS FARGO APPROVED MY LOANS, BUT REFUSE TO CLOSE.

SEE EXHIBITS (I) 2 EMAILS REQUESTING HIM TO ADD MY EVIDENCE PRIOR TO THE ORAL ARGUMENT.

I HIRED ANOTHER ATTORNEY, MR. JONATHAN ROSENBERG, AN APPELLATE COURT ATTORNEY, AFTER PRESENTING A MOTION FOR REHEARING, PRO SE, DATED MAY 29, 2020 TO THE APPELLATE COURT WAS GIVEN UNTIL JULY 13, 2020 TO PRESENT THE PETITION.

MR. ROSENBERG RECEIVED A COPY OF THE MOTION WITH MY EVIDENCE PRESENTED TO THE APPELLATE, SAID HE WOULD PERFECT AND ARGUE THE EVIDENCE, BUT AGAIN HE DID NOT PRESENT THE EVIDENCE, BUT WROTE A PETITION FOR PRO SE RIGHTS, KNOWING IT WOULD FAIL. HE PRESENTED IT TO THE COURT WITHOUT MY PERMISSION CONSENT KNOWLEDGE ON THE DEADLINE, AFTER HE BLEW UP IN AN ANGRY VIOLENT RAGE WHEN I WOULD NOT EXCEPT AND AGREE TO HIS PETITION THAT DIDN'T MENTION THE WORD EVIDENCE. I HAD TO FILE A FORMAL COMPLAINT WITH THE AUTHORITIES BECAUSE HE THREATENED HARM TO ME.

I ADVISED THE APPELLATE COURT ON JULY 13, 2020, THE DEADLINE AND SUBMITTED A HARDCOPY OF THE TERMINATION LETTER AND SUBMITTED ANOTHER MOTION FOR A STAY OF THE MANDATE ON THE 20TH, OF JULY, PENDING MY WRIT TO THE SUPREME COURT JULY 20, 2020.

JULY 21, THE MANDATE WAS ISSUED, BEFORE THE EXPIRATION OF THE 7TH DAY AS DICTATED BY THE FRAP#41, AND AFTER MY PRO SE MOTION FOR STAY WAS SUBMITTED TO THE APPELLATE COURT REQUESTING A STAY.

THE MANDATE WAS ISSUED PRIOR TO THE 7TH DAY IN VIOLATION OF FRAP#41 THERE WAS NO COURT ORDER ISSUED ORDING THIS MANDATE BEFORE THE EXPIRATION OF THE 7TH DAY.

Respectfully Submitted
Denise Jackson Pro Se

Denise Jackson

REASON FOR GRANTING PETITION

I'M ASKING THE SUPREME COURT TO INTERVENE IN MY CASE BECAUSE THE CONSTITUTION LAWS, AND OUR DEMOCRACY AS WE KNOW IT, IS THREATENED WHEN ALL AMERICAN CITIZENS IS NOT ALLOWED TO BENEFIT FORM THE CONSTITUTIONAL, STATUTORY PROTECTIONS AND PROVISIONS.

THIS IS OF NATIONAL IMPORTANCE, DECISIONS BY THE FEDERAL APPEAL AND DISTRICT COURTS ARE SPLIT AND INCONSISTENT, CONFLICTING AS WELL AS CONTROVERSY AS DECISIONS FROM SOME STATES GOT RELIEF FROM LAWSUITS AGAINST WELLS FARGO AND OTHER BANKS, BUT OTHER PEOPLE IN OTHER STATES RECEIVED NO RELIEF IN LAWSUITS FROM THEM RIGHTS BEING VIOLATED. PEOPLE NEED TO FEEL THAT THEY ARE NOT BEING DISCRIMINATED AND IGNORED WHILE THEY HAVE BEEN DISCRIMINATED BY THE FINANCIAL INSTITUTIONS AND OTHERS.

OUR GOVERNMENT PASSES LAWS THAT ARE MEANT TO BE BENEFICIAL TO ALL THE PEOPLE OF THE UNITED STATES. THESE LAWS TAKE INTO ACCOUNT THE RIGHTS AND BENEFITS THAT ARE GUARANTEED UNDER THE CONSTITUTION OF THE UNITED STATES. FEDERAL LAWS MUST NOT BE VIOLATED BY ANY UNPRINCIPLED INSTITUTIONS, ESPECIALLY THOSE THAT RECEIVE FEDERAL AND OTHER PUBLIC FUNDING. THIS COURT HAS THE AUTHORITY AND POWER TO UPHOLD ALL OUR RIGHTS FOR EVERYONE. THIS IS THE BUSINESS OF ADMINISTRATION OF JUSTICE.

NO ONE PERSON OR OFFICIAL GET TO CHOOSE WHO CAN BENEFIT FROM THE CONSTITUTIONAL LAWS AS AN AMERICAN CITIZEN, JUSTICE IS FOR ALL! WHEN YOU HAVE EVIDENCE TO SUPPORT YOUR COMPLAINT, THE COURT IS OBLIGATED TO CONSIDER, EXAMIN, AND SHOW IN THEIR FINDINGS OF FACT HOW IT PROVES OR DON'T PROVE YOUR COMPLAINT. THIS SHOULD BE INCLUDED IN THE FINDING OF FACT, EVIDENCE IS THE RULE OF LAW, APART OF OUR CONSTITUTION, AND OUR DEMOCRACY.
PLEASE SEE MY APPENDIX OF EVIDENCE.

ALL EXCLUDES NO AMERICAN CITIZEN, BUT INCLUDES ALL, ME TOO!

MANY PEOPLE HAS SUFFERED, AND WILL SUFFER FROM FINANCIAL LOSS ESPECIALLY BECAUSE OF THE PANDEMIC. THEIR HOMES MAY BE IN JEOPARDY OF FORECLOSURE. THE GOVERNMENT FEDERAL PROGRAMS ARE CREATED TO PRESERVE THE AMERICAN DREAM OF BUYING OR PRESERVING HOME OWNERSHIP.

THESE BANKS CAN NOT CONTINUE TO VIOLATE THE GUIDELINES POLICIES, PROCEDURES THAT THEY ARE OBLIGATED AND ENTRUSTED TO FOLLOW TO PRESERVE THE PRIVILEGE OF HOMEOWNERSHIP FOR THE AMERICAN PEOPLE AND THEIR FAMILIES.

CONCLUSION

I'M RESPECTFULLY REQUEST THIS COURT TO HEAR THIS COMPLAINT
BECAUSE JUSTICE WHEN THE CONSTITUTION LAWS ARE NOT APPLIED
EQUALLY TO ALL, EQUAL RIGHTS.

I HAVE A CONSTITUTIONAL RIGHT TO BRING FORTH THIS LAWSUIT, TO SUE FOR
DAMAGES, AND TO BRING FORTH MY EVIDENCE AND RECEIVE FAIR AND IMPARTIAL
TREATMENT.

I HAVE A RIGHT TO RECEIVE THE SAME RESPECT AS PRO SE LIGENT AS WELLS
FARGO LAWYERS, AND ANY OTHER LAWYERS IN THE COURTS AS PRO SE.

THE FINDINGS OF THE DISTRICT COURT WAS MADE WITHOUT CONSIDERING MY
EVIDENCE JUSTICE WAS NOT SERVED.

THE FINDING OF THE APPELLATE WAS MADE WITHOUT MY EVIDENCE, JUSTICE
AND FAIRNESS WAS NOT ADMINISTERED.

MY LAWYERS AS OFFICERS OF THE COURT CAUSED FRAUD ON THE COURT BY NOT
PRESENTING AND ARGUING MY VITAL EVIDENCE THAT PROVED MY COMPLAINT
SHOULD NOT HAVE BEEN DISMISSED.
THE APPELLATE COURT' CAME TO THEIR FINDINGS OF FACTS WITHOUT MY EVIDENCE
THREREFOR JUSTICE WAS NOT SERVICE FINDING.

EVIDENCE IS THE RULE OF LAW IT IS THE CONSTITUTION AND OUR DEMOCRACY.
CONFLICTING DECISIONS OF FEDERAL COURTS MUST BE RESOLVED.

FRAUD ON THE COURT VOIDS ALL JUDGEMENTS OF THE COURTS.

PLEASE SEE APENDIX FOR ALL MY EVIDENCE ON RECORD SUBMITTED TO THE
LOWER COURTS.

FOR ALL THE ABOVE REASONS THIS PETITION FOR WRIT OF CERTIORARI SHOULD BE
GRANTED AND REVERSE THE DECISION OF THE APPELLATE COURT.

Respectfully Submitted
Denise Jackson - PRO Se

DENISE JACKSON