

08/31/21

No: 21-346

MP

IN THE
SUPREME COURT OF THE UNITED STATES

YVONNE O. REIGNAT-VODI

PETITIONER,

v.

MARYLAND MOTOR VEHICLE ADMINISTRATION

RESPONDENT (S)

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

PETITION FOR A WRIT OF CERTIORARI

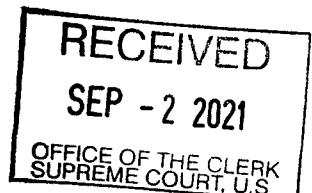
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I. Questions Presented

- (i) Did the courts follow the Procedural Due process subject to the 14th Amendment due process protection?
- (ii) Did the courts follow the Civil Due Process clauses of the Fifth, Sixth and Fourteenth Amendments the right for Petitioner to present evidences, and witnesses in this case?
- (iii) Can a court deny the filed Writ of Certiorari without providing explanation as to why the Writ of Certiorari has no show and not desirable in public interest but proceed with a dismissal of the case without a trial?
- (iv) Can a court deny the issuance of a Driver Education Instructors License and Certification Badge having known that the instructor did not commit any violation but proceeded with the dismissal of the case without a trial?
- (v) Did the Maryland State courts ignore the fundamental principles of due process in rejecting the case of Petitioner's Driver Education Instructors License and Certification Badge?
- (vi) Did the Administrative court failed to transfer Agency records to the Circuit Court of Prince Georges County Maryland that should be part of the fundamental process in the case of the brief trial held on October 15, 2019?
- (vii) Whether a pro se Petitioner should be denied request for transfer of (OAH) Agency records from the Circuit Court of Prince Georges County Maryland as a requirement that the tribunal prepare records of the evidence presented as stated in the Fifth and Fourteenth Amendments?

II. LIST OF PARTIES

All parties appeal in the caption of the case on the cover page. The party (s) involve is active with this proceeding.

Related Proceedings:

YVONNE O. REIGNAT-VODI D/B/A SHEPHERDS DRIVING SCHOOL

v. MARYLAND MOTOR VEHICLE ADMINISTRATION

Shepherds Driving School Inc.

- (i) Maryland Court of Appeals Case No. COA-PET-0005-2021
- (ii) Maryland Court of Special Appeals Case No. CSA-REG-2389-2019
- (iii) Circuit Court of Prince Georges County Case No. CAL19-18504.
- (iv) Office of Administrative Hearing Case No. OAH No. MDOT-MVA-15-19-

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IV. Petition for Writ of Certiorari

Petitioner, Yvonne O. Reignat-Vodi received a notice of hearing from the Maryland Motor Vehicle Administration dated October 15, 2019 at the Office of Administrative hearing, 11101, Gilroy Road, Hunt Valley, MD 21031. Petitioner was certified as a Driver Education Instructor by the Maryland Motor Vehicle Administration from May 2017 to March 7, 2019. Petitioner respectfully petition the United States Supreme Court for a Writ of Certiorari to review the judgement of the Court of Appeals Maryland in the case of Petitioner's Driver Education Instructors License and Certification Badge.

V. Opinions Below

The decision of the Maryland Court of Appeals dismissing the case of Petitioner Driver Education Instructors License certification badge was unfair and against the United States Constitutional Amendments. The Court of Appeals Maryland denied Petitioner Petition for Writ of Certiorari on April 23, 2021 and dismissed the case of the Driver Education Instructors license and Certification badge on June 8, 2021. The Order of Chief Judge Mary Ellen Barbera of the Court of Appeals is attached at Appendix (A) at 1a.

V1. Jurisdiction

The Court has jurisdiction over the courts but has false judgements and constitutional issues. Petitioner/Pro Se filed a Petition for Writ of Certiorari on time with the Court of Appeals Maryland but was denied on April 23, 2021 and dismissed

the case of the Driver Education Instructors License and Certification Badge on June 8, 2021. Petitioner submitted two Briefs to the Court of Special Appeals on time but was denied for the driver education instructor license and certification. Three Motions were submitted with the court for extension of time while awaiting the Administrative Agency records to be transfer to the Maryland Court of Special Appeals. The final Briefs were submitted including agency records on November 2, 2020. The case of the driver education instructors license, and certification was dismissed on October 13, 2020; Petitioner invokes the Court's Jurisdiction under 28 U.S.C. § 1257 (a) having timely filed the Petition for a Writ of Certiorari within ninety days of the Court of Appeals Maryland judgement in the case Petitioner's Driver Education Instructor's License and Certification Badge.

VII. Constitutional Provisions Involved

United States Constitution , Amendment V:

No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual services in time of War or public danger; nor shall any person be subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process

of law; nor shall private property be taken for public use, without just compensation.

United States Constitution , Amendment VI:

In all criminal prosecutions, the accused shall enjoy the right to speedy and public trial, by an impartial jury of the State and district wherein the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the Assistance of Counsel for his defense.

United States Constitution , Amendment XIV:

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 law; nor deny to any person within its jurisdiction the equal protection of the laws.

Statement of the Case

Petitioner was licensed by the Maryland Motor Vehicle Administration as a Certified Driver Education Instructor to provide thirty-six (36) hours Driver Education program from the period June 2017-March 2019. During these times Petitioner performed all duties as a Certified Driver Education License Instructor for both classroom and behind the wheel lessons and as a driving school owner without any violation. Petitioners abide to all rules and regulations in COMAR 11.23.01. Driver Education Program by the Maryland Motor Vehicle Administration for certified instructors and Driving School Owners.

On June 21, 2017 Petitioner was approved by the Maryland Motor Vehicle Administration for an “APPRENTICE PERMIT” on 06/26/2017 with a licensed certification badge number (35488). The Maryland Motor Vehicle Administration issued a driver education instructor Photo Identification badge to be able to perform the duties of a certified driver education instructor. See Appendix 93a. This process is required by the Maryland Motor Vehicle Administration as the first step to become a full licensed certified driver education instructor. The approval for Apprentice permit by the Maryland Motor Vehicle Administration involves training from another driving school. The owner of another driving school must present all qualifications and certificate to the Maryland Motor Vehicle Administration to verify that the instructor is qualified to be a full licensed instructor. Petitioner driver's education training records was sent by Alfredo's Driving School, located at 111 Chinquapin

Road #101 , Annapolis, MD, 21401. Petitioner took classroom certification training with Greg's Driving School, Main Office, located at 1502 South Main Street Suite 303, Mount Airy, MD 21771. All documents related to Petitioner driver education instructors training from both driving schools were submitted to the Maryland Motor Vehicle Administration.

It's obvious that the Maryland Motor Vehicle Administration Driver Education Division is responsible for the approval of all qualified apprenticeship in transitioning into the driver education instructor's certification program. After months of training Petitioner became a certified instructor for both classroom and behind the wheel lessons,

On June 20th 2017, Petitioner received a notification from the Maryland Motor Vehicle Administration Driver Instructional Services Division (DISD) that Petitioner Apprentice Instructor's Permit will be expiring on December 21, 2017. Specifies in COMAR 11.23.02.22(B). Maryland Code of regulations 11.23.02.17B(1)(2)(3)(4)(5) & (6) specifies the steps to attain a certified Driver Education License. The above rules were followed by Petitioner. The Driver Instructors Licensed Certification was approved by the Maryland Motor Vehicle Administration for two (2)years. Maryland Code of Regulations 11.23.02.19(A). A transition of Apprentice Instructor Permit to a Certified Driver Education Instructor from 06/26/2017 – 06/21/2019. See Appendix 92a, 93a. There was no violation committed by Petitioner against the Maryland Motor Vehicle Administration.

On December 21, 2019 Petitioner was a full licensed Certified Driver Education instructor for both classroom and behind the wheel by the Maryland Motor Vehicle Administration. As a certified Driver Education Instructor, petitioner performed not only the duties of an instructor but as the Owner of Shepherds Driving School overseeing the general operations of the Shepherds Driving School business. Renewing a Driver Instructor license indicates that Petitioner have been a certified Driver Education instructor. Maryland Code of Regulations 11.23.01.17A.B.(1)(2), Renewing a Driving Instructor's License. The above COMAR Code of Maryland Agency Regulations 11.23.01 driving schools and driver instructor license certification badge was followed as Petitioner have been teaching driver education course since 2017-2019. Petitioner was motivated to help students obtained their grades and become a certified Driver Education Instructor while operating Shepherds Driving school. There was no violation committed against the Maryland Motor Vehicle Administration. All requirements were met for Petitioner Driver Education Instructors License and Certification Badge.

Petitioner received a notice from the Maryland Motor Vehicle Administration Driver Education Services Division dated April 22, 2019 stated, that the instructors licensed assigned to Petitioner will expire on 06/21/2019. During this time Petitioner had filed an appeal in the case for Shepherds Driving School with the Circuit Court of Prince Georges County Maryland. See Appendix 91a.

On May 20, 2019 Petitioner received the Order from the Administrative court that Petitioner Driver Education Instructors License, issued on May 24, 2017 has

been revoked. Incorrect date of the issuance of Petitioner Driver Education License as the Administrative Court was wrongfully referring to Shepherds Driving School's License. However, this decision came as a shock to Petitioner as the Maryland Motor Vehicle Administration failed to specify the Administrative Court decision of May 20, 2019 against Shepherds Driving School operational license and the Driver Education Instructor License. Petitioner immediately notified the Maryland Motor Vehicle Administration Counsel David C. Merkin via email that there was an error as to whether the decision by the Administrative court on May 20, 2019 has anything to do with Petitioner Driver Education Instructor's License and Certification Badge. Petitioner did not get a response from Counsel David C. Merkin of the Maryland Motor Vehicle Administration on the mistakes and/or irregularity neither did the Administrative Court made any amendments to the errors of May 20, 2019 on time. See Appendix 22a- 23a.

On May 30, 2019 the Maryland Motor Vehicle Administration Counsel David C. Merkin sent a letter to the Maryland Motor Vehicle Administration requesting that clerk directed the matter of the change in the order of May 20, 2019 to Administrative Law Judge Michael Wallace revising the Administrative court decision due to mistakes and/or irregularities and to correct the order. Petitioner did not hear from the Administrative Counsel David C. Merkin neither the Administrative court.

On June 10, 2019 the Maryland Motor Vehicle Administration Counsel David C. Merkin received the decision from the Administrative court amending the decision

dated June 6, 2019. The decision was amended from the driver education instructors licensed and certification badge to Shepherds Driving School's license to provide service.

On June, 14 2019 after the Administrative court amended decision was received, Petitioner proceeded with a criminal background record check with the Department of Safety and Correctional services. The background check was done at the Administrative Branch in Frederick Maryland. Maryland Code of Regulations 11.23.02.14A.B.(1)(a)(b); The above COMAR rule was followed, and finger printing was done by the Maryland Motor Vehicle Administration. See Appendix 106a. Even though there was a delay with the mailing process it took about a week for petitioner to receive a verification of the criminal records processed from the Maryland Motor Vehicle Administration as a proof a Petitioner's Driver Education License renewal.

On June 13, 2019 Petitioner went to Alcantara Driving School to renew her Driver Education Instructors license and Certification badge. Alcantara Driving School accepted petitioner's application and submitted it to the Maryland Motor Vehicle Administration on June 13, 2019. A confirmation message was received by Alcantara Driving School that the renewal package was received by the driver education division, Room 207, Glen Burnie, Maryland Motor Vehicle Administration. See Appendix 96a, 97a.

On June 22, 2019 an assessment was made by Alcantara Driving School certifying that Petitioner have done all hours for in classroom and behind the wheel instruction for the renewal of the driver education instructor license. The Owner of

Alcantara Driving School Mr. Raphael Alcantara informed to the Maryland Motor

Vehicle Administration that Petitioner was in compliance with all laws, regulations, policies, and rules during the program and that Petitioner is ready to be evaluated to see if all requirements were met. See Appendix 107a. Petitioner's evaluation went well, but still awaits the renewal of her driver instructor's license. Petitioner chose not to work for Alcantara driving school until a renewal of the driver instructor license. The Maryland Motor Vehicle Administration failed to renew driver education instructor's certification which could have granted me access to work for another driving school and take care of my family, instead the Maryland Motor Vehicle Administration waited for the driver education instructors license to expire and created false allegations against petitioner. Petitioner did not comply with the certification to work for Alcantara Driving School as the Driver Education Instructor Licensed Certification Badge had expired in 06/21/2019. Petitioner was fully aware of not committing any violation with the Maryland Motor Vehicle Administration by taking up an employment with Alcantara Driving School.

On July 8, 2019 Petitioner received a letter from the Maryland Motor Vehicle Administration stating that the Administration receive the application from Alcantara Driving School and confirmed that Petitioner's application was hand delivered by the Secretary of Alcantara driving school on 06/21/2019. The was not true as the application was submitted on June 13, 2019 prior to the deadline. The Maryland Motor Vehicle Administration Driver Education Division stated that the application can't be renewed due to a late submission even though it was submitted

on time. If at all, the application was late, the Maryland Motor Vehicle Administration knew about the delay as it was due to the mistakes and/or irregularity on the May 20, 2019 Administrative court decision by Administrative Law Judge Michael Wallace. See Appendix 23a. Several emails of communication were sent to the Maryland Motor Vehicle Administration Driver Education Instructional Division Assistant Manager Mr. William Kraft, explaining that the application was submitted on time, but due to the Administrative court decision of May 20, 2019 Petitioner was unable to renew the Driver Education Instructor License and Certification Badge. The Maryland Motor Vehicle Administration failed to correct the mistakes and/or irregularity and get back to Petitioner on time with the Amendments from the Administrative Court.

The renewal of the Driver instructors badge certification stated in Maryland Code of Regulations 11.23.01.17E,(1)(2) were met by Petitioner in the case of the Driver Education Instructors License. Petitioner was still a certified Driver Education Instructor while at the same time going through litigation for Shepherds Driving School. The instructor license certification did not expire until 06/21/2019. In as much, Maryland Code of regulations 11.23.02.19ABC(1)(2) has already been done by another driving school. The notion of the Maryland Motor Vehicle Administration for Petitioner to reapply for the second time to become a driver instructor does not make sense as Petitioner have already been a certified instructor for the past two years and had been a driving school owner. The next step should have been the renewal of Petitioner's instructors licensed and not as a new applicant.

On February 7, 2020, Petitioner filed an appeal with the Maryland Court of Special Appeals for Driver Education Instructor License and Certification Badge. First, to be clear, there were no Agency records transferred from the Circuit Court of Prince Georges County Maryland to the Court of Special Appeals at the start of the case of the Driver Education Instructor license and certification. Agency records should have been transferred for the court to be able proceed with the case, instead the court proceeded issuing out fake orders while Petitioner await Agency records from the Circuit Court of Prince Georges County Maryland to the Maryland Court of Special Appeals Maryland, but the court failed to do so. This is in violation of the constitutional laws.

Due to the delay of the Circuit Court of Prince Georges County transferring Agency records to the Court of Special Appeals, Petitioner filed three (3) motions to extend time for filling Petitioner corrected briefs. There were no delays as the motions were filed on time. First Motion to extend filling was filed on August 26, 2020; Second Motion filed on September 14, 2020 and Third Motion file on September 24, 2020 . Two of the motions were denied by the Court of Special Appeals, knowing very well that the Circuit Court of Prince Georges County Maryland have not transfer agency records to complete the Petitioner's Briefs. The second motion to Extend Time requested by the Maryland Court of Special Appeals requested that Petitioner filed it corrected Briefs for the case of the Shepherds Driving School. Petitioner filed two Briefs with the Court of Special Appeals and both briefs were denied because there

were no Agency records for its inclusion to complete Petitioner's corrected Briefs.

Then, the third motion to extend time for filing was submitted to the Court of Special Appeals on September 24, 2020.

On August 11, 2020, the Court of Special Appeals issue an order directing the Circuit Court of Prince Georges County Maryland to transmit Agency records with its inclusion. A third motion of extension of time was submitted to the Court of Special Appeals on September 24, 2020. Petitioner knowing that the transfer of Agency records to the Court of Special Appeals were late for the submission of corrected briefs, eventually Petitioner submitted the third briefs including agency records for the driver education instructor license and certification badge. Also, a partial hearing at the office of Administrative hearing (OAH) on October 15, 2019 was not included in the transcript that was sent to the Circuit Court of Prince Georges County Maryland.

There was a lot of inconsistencies with the Court orders identified by Petitioner to the Court of Special Appeals but were not corrected. Clerical mistakes on case numbers made on the Court docket entries were identified by Petitioner to the Court of Special Appeals but no action was taken. The Court of Special Appeals granted the Maryland Motor Vehicle Administration an extension of time to submit its briefs, while Petitioner was still waiting for Agency records to be transferred from the Circuit Court of Prince Georges County Maryland to the Court of Special Appeals. No briefs were submitted to the Court of Special Appeals by the Maryland Motor Vehicle Administration. The third Briefs with Agency records and its inclusion was submitted

to the Court of Special Appeals on October 29, 2020 and November 2nd 2020 respectively.

Transfer of Agency records from the Circuit Court of Prince Georges County Maryland to the Court of Special Appeals is a requirement that the tribunal prepare record of the evidence presented as stated in the Fifth and Fourteenth Amendments of the United States Constitution. The Court of Appeals failed to acknowledge the negligence of the Circuit Court of Prince Georges County Maryland for not transferring Agency records on time but willfully dismiss the case of Petitioner's Driver Education Instructors Licensed with prejudice on October 30th 2020.

On March 1, 2021 Petitioner filed an appeal with the Court of Appeals Maryland together with a Petition for Writ of Certiorari for the case of the Driver Education Instructors License and Certification badge. The Petition for Wirt for Certiorari for the driver education instructors license was filed on time. On April 23, 2021, Petitioner received an Order that the Writ of Certiorari has been denied by the Court of Appeals Maryland, and on June 8, 2021, the case of the driver instructors licensed, and certification was dismissed again with prejudice.

Several questions were raised by Petitioner to the Clerk and Chief Judge as to why the Case of the Driver Education Instructors license was not showing that review by certiorari is desirable and in public interest? Petitioner was licensed by the Maryland Motor Vehicle Administration to provide thirty-six (36) hours Driver Education program to the public. All of Maryland Code Regulations provides in relevant part in 11.23.01.12.13.14.15.16.17 Driving Schools, for Driver Education

Instructor License and Certification Badge were followed by Petitioner. More so,

Petitioner was licensed to provide classroom and behind the wheel lessons to the public in the State of Maryland by the Maryland Motor Vehicle Administration. Therefore, shows that the Driver Education Instructor Licensed and Certification of Petitioner is desirable and in the public interest. The Clerk, Suzanne Johnson and the Chief Judge Mary Ellen Barbera of the Maryland Court of Appeals failed to answer questions presented by Petitioner dated May 25, 2021. See Appendix 31a-36a,42a-75a.

There was too many mistakes and irregularities on Court Orders and decisions of the Maryland Court of Appeals. Petitioner noticed a significant errors on Chief Mary Ellen Barbera's Order dated April 23rd 2021 stating the "Petitioner filed a Writ of Certiorari at the Court of Special Appeals" Maryland. This was not correct, as Petitioner filed Petition of Writ for Certiorari with the Court of Appeals Maryland and not vice versa. Subsequently, on the Court of Appeals letter dated May 13, 2021 the court stated, "We are treating your pleading as motion for reconsideration" see Appendix 35a. Petitioner has grounds in the case of the Driver Education Instructors License and Certification badge and did not make a plea with the Court of Appeals Maryland. This was a false claim by the court, Petitioner Objected to the Chief Judge's order dated May 10, 2021. As such, Objection by Petitioner and a plea are two different factors. See Appendix 65a-75a.

It is evident that clerical mistakes can be corrected by the courts, but the Court of Appeals failed to do so, as such dismissed the case of the Driver Education

Instructors license and Certification Badge. Federal rule of Civil Procedures Rule 60

(a) Relief from a Judgement or Order ¹.

¹ Rule 60 (a) Relief from a judgement or Order. Corrections based on Clerical Mistakes Oversights and Omissions; The Court may correct a clerical mistake or a mistake arising from oversight or omission whenever one is found in a judgement, order, or other part of the record. The court may do so on motion or on its own, with or without notice. But after an appeal has been docketed in the appellate court and while it is pending, such a mistake may be corrected only with the appellate court's leave

ARGUMENT

On November 14, 2019 the Administrative court failed to follow Procedural due process in the case of Petitioner's Driver Education Instructor's License and Certification Badge. There was no full hearing conducted, no witnesses testified, neither did the court provide Petitioner a right to a Counsel. As such, Petitioner did not commit any violation in the statutes since May 2017 to March 2019. The Administrative Law Judge Steven Adler's decision was legally wrong and based its decisions patently unreliable evidence. The decisions and order of revoking Petitioner's Driver Education License and Certification Badge not only puts Petitioner out of work but also effectively forces Petitioner into unemployment and indigence.

The Administrative Court ruling in favor of the Maryland Motor Vehicle Administration was unfair and shows lack of credibility. The Administrative Court revoked the Driver Education Instructor Licensed and Certification badge of petitioner without following procedural due process. In as much, the decision of the Administrative court dated November 14, 2019 is a proof of how the Maryland Motor Vehicle Administration wrongfully used false allegations of Shepherds Driving School into the case and decision of the Driver Education Instructors License and Certification Badge of Petitioner. False allegations such as, Petitioner employed an individual who was not licensed as a driving instructor to provide any driving instruction for compensation and Petitioner failed to make operation and student

records available for inspection by the Administration during the school business hours. These are false allegations made by the Maryland Motor Vehicle Administration and their Administrator Christine Nizer to damage the character and reputation of Petitioner, her husband Smith Kwame Oliver Vodi and Shepherds Driving School.

Petitioner is kindly directing this Court to the case of Shepherds Driving School. Information of instructors that drove alleged student Leena Mohammed records were handed over to the Maryland Motor Vehicle Administration and can be seen for verification. See appendix 109a-114a, 147a-169a. Mr. Jipei Cui the other so-called alleged student did not attend Shepherds Driving School. A copy of Mr. Jipei Cui's Learners Instructional Permit was handed over to Administrative Law Judge Michael Wallace during the Administrative hearing. Mr. Jipei Cui's learners permit can be verified by this court from the case of Shepherds Driving School. Evidently, all students that attended Shepherds Driving School in May 2017-March 2019 were driven by nine (9) instructors including Petitioner. So, it is a false claim by the Maryland Motor Vehicle Administration that Petitioner's husband Smith Kwame Oliver Vodi drove students. Mr. Smith Vodi was hired as the General Manager and performed such duties. As such, there is no rule in Maryland Code of Regulations 11.23.01 that prohibits him to be hired as the General Manager for the Driving School. The Administrative court incorporating the case of Shepherds Driving School into Petitioner Driver Education License and Certification Badge is

incoherent and it's in violation of Petitioner's right to hold a Driver Education Instructor's License and Certification Badge.

Administrative Law Judge Steven Adler falsely claimed in his ruling on Motion for Summary decision dated November 14, 2019 that Petitioner failed to submit a response to the motion filed by the Maryland Motor Vehicle Administration dated October 11, 2019. This was not correct. It's unfortunate that the said motion falsely claimed by the Maryland Motor Vehicle Administration was not received by mail as claimed by the Administrative court. The Maryland Motor Vehicle Administration can manipulate the mailing system with court decisions of correspondences for Petitioner goes to the wrong address. See Appendix 25a-32a, 144a. If so, how could a response be filed by Petitioner when there was no full hearing conducted for the case of the Driver Instructors License and Certification Badge? It is evident On October 15, 2019 that there should be a full hearing for a motion to be submitted to the Administrative Court. Administrative Law Judge Steven Adler boldly said during the October 15, 2019 hearing that he was there to "INVESTIGATE" and not to conduct a hearing. Administrative Law Judge Steven Adler promised to liaise with his Secretary and set up another date for full hearing for both parties. The Administrative Court introduce in its brief hearing on 10/15/2019 of the case of Petitioner Driver Education Licensed and Certification Badge without any sworn statements or testimonies from both parties. The Administrative Court failed to follow the procedural due process in the case of the Driver Education Instructor License and Certification Badge.

Evidence submitted by the Maryland Motor Vehicle Administration was

Petitioner's own evidences. This was very manipulative and shows lack of credibility by the Administrative court and the Maryland Motor Vehicle Administration. Petitioner's presented evidences to Administrative Law Judge Steven Adler, but the evidences were not accepted by ALJ Steven Adler during the Administrative hearing. However, even in Administrative court proceedings the authenticity of evidence must be established, *Department of Public Safety & Correctional Services v. Cole*, 79 342 Md. and 12 (1996). The Administration introduce evidence of the Maryland Motor Vehicle Administration. As such, there was no full hearing conducted and no swearing of oath in the so-called Administrative hearing held on October 15, 2019. The Maryland Motor Vehicle Administration had Mr. William Kraft as their witness representing the Administration and David C. Merkin as Counsel.

The Administrative court did not allow Petitioner's witness to testify neither submit evidences of the Driver Education Instructors license and Certification Badge. Even though "Summary judgement is appropriate if there is not 'genuine issue of material fact.'" *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, (1986) in this case Petitioner presented evidence but the Administrative Court failed to acknowledge the evidences. In general, there was no full hearing conducted in the case of Petitioner Driver Education Instructors license and Certification Badge on October 15, 2019. See Appendix 123a.

It is the rule of the Maryland Motor Vehicle Administration that Driver Education Instructors License must be renewed by another institution for the

instructor to be recertified as a Driver Education Instructor every two (2) years.

Petitioner filed the case of the Driver Education Instructors license and Certification Badge with the Circuit Court of Prince Georges County on September 9, 2019 after a long period of waiting to hear from the Maryland Motor Vehicle Administration of the May 20, 2019 decision Amendments by Administrative Law Judge Michael Wallace. The Administrative court intentionally dismissed the case of the Driver Education Instructors license with prejudice.

Evidently, the Maryland Motor Vehicle Administration has damaged the character and reputation of Petitioner in its November 14, 2019 decision *“analysis”*. Stating in the Administrative court decision their decision falsely used Maryland Code Ann., Transportation Article 15-104, 15-109, 15-1702, 15-1710 (2012) states (a) A person may not be licensed under this subtitle unless the person.

(1) Is an individual of good reputation and moral character; (2) Is licensed to drive under Title 16 of this article. (3) Has completed the Instructor certification program approved by the Administration; and (4) Is either; (i) Licensed under Subtitle 7 of this title to conduct a drivers' school; or (ii) Employed a driving instructor by a licensed driver' school

First, the Administrative court applying the above rules in their November 14, 2019 decisions to the case of the Driver Education Instructor license and Certification Badge was ridiculous, indicating a false implication jeopardizing Petitioner's character and reputations. What the Administrative court and the Maryland Motor

Vehicle Administration should know is that Petitioner has a good reputation and moral character to own both Driver Education Instructors license and a reputable driving school as Shepherds Driving School reflects Petitioner's character and reputation. Petitioner was approved as a Driver Education Instructor and the Owner of Shepherds Driving School in May 2017-March 7, 2019. Also, Petitioner is a graduate from three (3) reputable institutions in the State of Maryland and Washington District of Columbia respectively. Petitioner is an ordained Minister of the gospel, and earned these degrees AA, BSc. MSA/PCH in Administration from accredited Universities and have been a law-abiding Citizen of the United States.

More so, Petitioner has clean records with both the State and Federal based on her criminal background history that was conducted by the Maryland Motor Vehicle Administration in 2017 and 2019, See Appendix 92a-94a, 106a. For the above reasons, Petitioner is well respected by the society and overly qualified to own a Driver Education Instructors License and a Driving School in the State of Maryland. However, Petitioner has a clean driving record, never been arrested, never committed a crime, never been in jail. It is a show that Petitioner has a moral character. It's outrageous, for a big Organization like the Maryland Motor Vehicle Administration going after ordinary law-abiding citizens with no criminal history, owner of a small business Shepherds Driving School and trying to bring down the character and reputation of Petitioner. Close Petitioner's own driving school business for no valid reasons.

It is the same despicable act the Maryland Motor Vehicle Administration used towards my husband Smith Kwame Olive Vodi revoked his Driver Education License and Certification Badge on June 5, 2012. This hate and act of discrimination to law abiding citizens must stop towards normal citizens that have not commit any violations or crime in our society. This is unacceptable and it is against the Constitutional laws.

Second Petitioner is licensed to drive under Title 16 as she owns a full driver's licensed and was certified as a driving instructor by the Maryland Motor Vehicle Administration. See Appendix 92a-95a. Obviously, Petitioner completed the basic Driver Education Instructor Certification Program with Alfredo's Driving School at 111 Chinquapin Rd, Annapolis, MD, 21401 and went up to the level of obtaining a Driver Instructors Permit from the Maryland Motor Vehicle Administration. Petitioner became a full licensed Driver Education Instructor in May 2017 to teach both classroom and behind the wheel instruction. Therefore, all requirements by the Maryland Motor Vehicle Administration as a certified Driver Education Instructor for both classroom and behind the wheel instructions were met. See Appendix 92a – 94a.

Evidently, Petitioner was approved by the Maryland Motor Vehicle Administration to conduct Driver Education in 2017, an application was submitted to the department of Driver's Education Instructional services and was approved to provide thirty-six hours Driver Education Program in the State of Maryland to the Public. See Appendix 88a-90a. During this time Petitioner was the Owner of

Shepherds Driving School and performed the duties as both Driver Education Instructor and a licensed Driving School Owner. Petitioner presented all evidences during the so-called Administrative hearing, but Administrative Law Judge Steven Adler failed to accept the evidences but proceeded with the dismissal of the case of the Driver Instructor License and Certification badge with prejudice. Even though Judge Adler said he was going to schedule a date and time for a hearing. ALJ Steven Adler failed to do so with negligence.

The Maryland Motor Vehicle Administration falsely claimed that Petitioner was not licensed to conduct a driver's school/Shepherds Driving School License Number (C00673) and Driver Education Instructor License Number (35488)

Petitioner is referring this court to the Affidavit of Mr. William for the above accusation. It is clearly shown on the Affidavit of Mr. William Kraft Section Manager Driver Education Division Maryland Motor Vehicle Administration that Petitioner was a certified Driver Education Licensed Instructor since May 2017 – June 2019. See Appendix 124a-125a. Shepherds driving school was owned, operated by petitioner, and was approved for driver education services by the Maryland Motor Vehicle administration on May 24, 2017. Petitioner was certified as a driver instructor from June 26, 2017 to June 21, 2019. Shepherds Driving School was issued a Driving School license Number **(C00673)** and Petitioner was issued a Driver Education Instructor's License and Certification Number **(35488)** by the Maryland

Motor vehicle Administration. Apparently, the above claim by the Administrative court and the Maryland Motor Vehicle Administration is totally false.

Maryland Motor Vehicle falsely claimed that Petitioner was not employed as a driving instructor by a licensed driving school

Petitioner did driver instructors training with Alfredo's driving school during the period 2016-2017, and apparently did classroom training with Greg's Driving School. Inc. located at 1502 South Main Street, Mount Airy, MD 21771. Petitioner Behind the Wheel training was done by State Trainer Earl Garner of the Maryland Motor Vehicle Administration. All grades and documentations of certification by both schools were submitted to the Maryland Motor Vehicle Administration before certification. The rule of the Maryland Motor Vehicle Administration is that all instructors must go through a driving school for training as part of the process of becoming a full licensed certified instructor.

As a graduate from a reputable institution, Petitioner met all requirements by the Maryland Motor Vehicle Administration as a certified Driver Education Instructor and demonstrated the proficiency in teaching the Maryland Motor Vehicle Administration approved Curriculum since May 2017, in COMAR 11.23.01.13 Driver Education Instructor's License. The Maryland Motor Vehicle Administration wanted Petitioner to start over the process of becoming a Driver Education Instructor when Petitioner has been a certified instructor since 2017 – 2019. For a driver Education Instructor to have his or her Driving Education Instructors License renew he/she must go through another driving school to get the instructors license renewed.

On August 28, 2019 Petitioner received a letter from Ms. Christine Nizer, Administrator Maryland Motor Vehicle Administration, Driver Education Division Maryland Motor Vehicle Administration refused to grant Petitioner's Driver Education Instructors license and Certification Badge. A copy of the letter was directed to the Maryland Motor Vehicle Administration section Manager Mr. William Kraft, Division of driver instructional services. See Appendix 109a – 114a.

Ms. Christine Nizer Administrator, Maryland Motor Vehicle Administration stated on the letter dated 08/28/2019, that Petitioner have the right under TR12-203(B) and 15-110 (a) to request for a hearing within fifteen (15) days from the date the letter was mailed to Petitioner, and the request should be directed to Mr. William Kraft section manager, division of driver instructor's services of the Maryland Motor Vehicle Administration.

On September 3, 2019 Petitioner sent a letter to the Maryland Motor Vehicle Administration requested a hearing as instructed on the letter of August 28, 2019. Petitioner explained in her request to Mr. William Kraft the reasons the application for the renewal of Petitioner driver instructor's license was late was due to mistakes and/ or irregularities on the Administrative court decision of May 20th 2019 for Shepherds Driving School and there should be no reason why Petitioner should be denied the renewal of the Driver Education Instructor's licensed Certification to be able to work for another driving schools.

On September 17, 2019, Petitioner received a notice of hearing from the Administrative Court. The hearing was scheduled for October 15, 2019 at 9:30am.

There was a brief hearing conducted by the Administrative Court. The Administrative Law Judge, Steven V. Adler promised to conduct a full hearing for both parties as both sides did not fully present their case. See Appendix 123a. During the hearing Counsel David C, Merkin of the Maryland Motor Vehicle Administration verbally notified Petitioner that the case of the Driver Education Instructor license was dismissed. A reply to the verbal dismissal of Counsel David C. Merkin dismissal dated October 20, 2019 was sent to the Administrative court and the Maryland Motor Vehicle Administration, but no avail no one from the Administration gets back to Petitioner on the matter. There was no transcript for the Administrative hearing on October 15, 2019 from the Administrative presented to the Circuit Court of Prince Georges County.

Again, Administrative Law Judge Steven Adler had a brief hearing on 10/15/2019, but clearly stated that he was at the hearing to “INVESTIGATE” and not to conduct a hearing. Judge Steven Adler stated that if a hearing was needed his Secretary will call both parties to set up a date and time. On October 15, 2019 a copy of the withdrawal of sponsorship for the renewal of Petitioner’s Driver Education instructors license from Alcantara Driving School was handed over to Petitioner in court by Counsel David .C. Merkin. The Maryland Motor Vehicle Administration intentions for the dismissal of both cases as discussed in the court was with prejudice. During this time both cases had already been filed with the Circuit Court of Prince Georges County Maryland on September 9, 2019 was due to the delay by the Maryland Motor Vehicle Administration. The Maryland Motor Vehicle

Administration decided to dismiss both cases without contacting Petitioner to file a

Motion to reject the decision of the Administrative Law Judge Steven Adler. The decision of the Administrative court was unreasonable and unfair.

There was a lot of conspiracy and manipulation transpired in the court room between the Maryland Motor Vehicle Administration Counsel David C. Merkin, William Kraft, Section Manager driver education services Maryland Motor Vehicle Administration and Administrative Law Judge Steven Adler. As explained, Petitioner did not work for Alcantara Driving School and was waiting to be evaluated and fulfill all necessary requirements to go behind the wheel with students and classroom instruction. As such, Petitioner Driver Education Instructors license expired on June 21, 2019. The Maryland Motor Vehicle Administration failed to renew Petitioner Driver Education License and Certification Badge and dismissed the case on November 14, 2019.

On September 9, 2019 Petitioner filed an appeal with the Circuit Court of Prince Georges County Maryland for the case the Driver Education Instructors license and Certification Badge against the Maryland Motor Vehicle Administration. Also, Petitioner requested for a representation of Counsel on the case, but no representation of Counsel was provided by the Circuit Court of Prince Georges County Maryland. See Appendix 135a, This is against the Constitutional for preventing Petitioner the right to a Counsel.

On December 9, 2019 Petitioner handed over a letter to the Clerk of the Circuit Court of Prince George's County Maryland and Judge Tiffany Anderson requesting

an Amendment made to the party been sued in the person of Mr. William Kraft.

Petitioner immediately made the amendment through the Clerk's office as requested by Judge Tiffany Anderson from Mr. William Kraft to the Maryland Motor Vehicle Administration. See Appendix 133a-134a. Several judicial branches were contacted for assistance but to no avail none was willing to represent Petitioner in the case of the driver education instructor's license. A request for a representation was made through the Clerk's office and a separate request was sent to Judge Tiffany Anderson's chamber. Both requests were denied by the Circuit Court, and this is against the VI Amendment of the United States Constitution denying Petitioner the right to Counsel. See Appendix 135a,

On January 24, 2019 a trial was set at the Circuit Court of Prince Georges County Maryland and was conducted by Judge Tiffany Anderson. Petitioner wasn't allowed to testify neither represented as a Pro se. Judge Tiffany Anderson requested Petitioner seek a representation but based on petitioner poor experience on the search for a Counsel, unemployment and lack of financial status, Petitioner was unable to hire a Counsel in the case of the Driver Education Instructors license and Certification. Mr. Smith Vodi Petitioner's witness was present at the trial, but not allowed to testify. Judge Tiffany Anderson affirmed the decision of the Administrative court without no procedural due process and dismissed the case on 01/24/2020 for the Driver Education Instructors licensed and certification Badge with prejudice, hate and discrimination. See Appendix 21a.

On February 7, 2020, Petitioner filed the case of the Driver Education Instructors License Certification with the Court of Special Appeals Maryland. The Court of Special Appeals on August 11, 2020 requested the transfer of agency records from the Circuit Court of Prince Georges County Maryland to the Court of Special Appeals. The Circuit Court of Prince Georges Maryland failed to do so on time. There was a delay in the path of the Circuit Court of Prince Georges County transferring agency records to the Court of Special Appeals. Petitioner submitted three Motions to Extend time for filing Appellant's corrected briefs with the inclusion of the Agency records on the dates as follows; First motion August 26, 2020; Second Motion September 14, 2020 and Third Motion September 24, 2020, respectively. While awaits the records from the Circuit Court of Prince Georges County Maryland to be transferred over to the Court of Special Appeals but the court failed to do so on time. Finally, Petitioner was able to complete the corrected briefs for the Driver Instructors license and certification including Agency records and submitted to the Court of Special Appeals on October 29, 2020. After Petitioner submitted the briefs to the Court of Special Appeals, the case of the Driver Education Instructors license and certification was dismissed without no procedural due process. Transfer of Agency records from the Circuit Court of Prince Georges County Maryland to the Court of Special Appeals is a requirement that the tribunal prepare record of the evidence presented as stated in the Fifth and fourteenth Amendments of the United States Constitution, but the court failed to do so and dismiss the case of the Driver Education Instructors licensed and Certification Badge.

Petitioner filed a Petition for Writ of Certiorari with the Maryland Court of Appeals on March 1, 2021. After 6 weeks the court dismissed the Petitioner for Writ of Certiorari claiming that the Writ of Certiorari has no show and was not desirable in public interest. The Court of Appeals had the case of the Driver Education Instructors license and certification badge together with Shepherds Driving School stating that both cases have no show, and it is not desirable in public interest. However, Petitioner was licensed by the Maryland Motor Vehicle Administration as a certified instructor to conduct business as a Driver Education Instructor to provide service to the public in the State of Maryland. Evidently, Petitioner fulfilled all requirements in COMAR 11.23.01 for Driving School, and Driver Instructors License and certification as a requirement by the Maryland Motor Vehicle Administration. Petitioner was licensed for both classroom and behind the wheel instruction. The Clerks and Judges of the Court of Appeals failed to acknowledge the failure of the transfer of Agency records in the case of Petitioner Driver Education Instructors licensed and certification badge from the Circuit Court of Prince Georges County Maryland. A request for a pickup of Agency records by Sir Speedy for copies to be made from the Court of Special Appeals was submitted on 09/29/2021. See Appendix 80a-81a.

Evidently, there was a lot of errors on the decisions from the Court of Appeals as the court failed to explain its decision when questioned by Petitioner except denied the Petition for Writ of Certiorari and dismiss the case of the Driver Education Instructors licensed and certification badge with prejudice.

It is Petitioner's humble request that this Court call for the original transcripts from the Office of Administrative hearing (OAH) brief hearing held on October 15, 2019, and the Circuit Court of Prince Georges County Maryland for the case of Petitioner Driver Education Instructors Licensed and Certification Badge. See the blatant lies, fake decisions, and the abuse of power by the Maryland Motor Vehicle Administration in the court proceedings for the Driver Education Instructors licensed and Certification. Petitioner did not commit any violation since 2017 – May 2019. Revoking the Driver Education Instructors license and Certification badge of Petitioner was unreasonable by the Maryland Motor Vehicle Administration. As a United States Citizen, Petitioner deserve the right to a fair trial and request that this Court hold the lower courts accountable for going against the V, VI, and XIV Amendments of the United States Constitution in the case of the Driver Education Instructors License and Certification Badge.

REASONS FOR GRANTING THE PETITION

A To avoid incorrect decisions of the right to Procedural due process, and the right to Counsel of this case. The decisions of the lower courts were void since the start of the case. This Court should clarify the “decisions” of the courts denying and dismissing the case of Petitioner Driver Education Instructors Licensed and Certification Badge.

The Office of Administrative Hearing (OAH) in Maryland did not follow the procedural due process in the case of the Driver Education Instructors License and Certification Badge. This is in violation of Amendment XIV of the United States Constitution.

The Maryland Motor Vehicle Administration falsely claimed that Petitioner was not licensed to conduct a driving school

This is totally a false allegation by the Maryland Motor Vehicle Administration as Petitioner was licensed to conduct a driving school. Maryland of Regulations 11.23.01.04.05(A)(B)(C) Applying for driving school was adhered by Petitioner. COMAR 11.23.01.05 Applying for a Driving School License was followed accordingly as a requirement by the Maryland Motor Vehicle Administration. Evidently Petitioner was given a driving school operational license number as (C00673), For Shepherds Driving School's and was issued by the Maryland Motor Vehicle Administration. This was a requirement of all driving school in the State of

Maryland. All requirement for Driving School's in Maryland Code of Regulations

11.23.01 for the operation of a Driving School was followed by Petitioner. If Petitioner wasn't licensed to conduct a Driving School, How did Shepherds Driving School conduct business operation since May 2017- March 7, 2019? As such, how did the Maryland Motor Vehicle Inspectors got into the driving school requesting for student records? How did Shepherds driving school came into existence? and how did the driving school get licensed, insured, and bonded by the State of Maryland? Petitioner totally disagree with the allegations by Administrative Law Judge Steven Adler. This was a clear indication of a false representation by the Maryland Motor Vehicle Administration.

The Maryland Motor Vehicle Administration falsely claimed that Petitioner was not employed as a Driving Instructor by a license Driving School.

Maryland Code of Regulations 11.23.01.15(A)(B)(C)(D) rules were acknowledged and followed by Petitioner. Copies of Petitioner schools' qualifications was submitted by Alfredo's Driving School and Greg's Driving School was handed over by both schools to the Maryland Motor Vehicle Administration as a verification that Petitioner went through the required training process to become a Certified Driver Education Licensed Instructor. Evidently, Petitioner was employed by Alfredo's Driving School in Annapolis Maryland before receiving a driver instructors permit from the Maryland Motor Vehicle Administration. Petitioner took advance Behind the Wheel Advanced Training by State Trainer Earl Gary Garner who submitted behind the wheel scores to the Maryland Motor Vehicle Administration.

The Court of Special Appeals and the Circuit Court of Prince Georges County

Maryland failed to transfer Agency records with its inclusion at the beginning of the case of the Driver Education Instructors licensed and certification Badge. Failing to transfer Office of Administrative Hearing (OAH) and other Agency records by the tribunal is against the constitutional right of the Petitioner. As such the delay of the transfer of the OAH Agency records by the Circuit Court of Prince Georges County Maryland made Petitioner not to complete its third and corrected briefs on time. Therefore, with no Agency records Petitioner's corrected Briefs would not be submitted to the Court at all. Eventually, the Office of Administrative Agency records were transferred over to the Court of Special Appeals on September 8, 2020 but Petitioner was not notified by the court regarding the arrival of the records until September 22, 2020 the Clerk Gregory Hilton of the Court of Special Appeals confirmed over a telephone conversation with Mr. Smith Vodi that the records have arrived at the court. The Clerk recommended that Sir Speedy picked up the records to make copies. See Appendix 81a, The court acted with negligence, deliberately issued fake orders dismiss the case of the Driver Education Instructors licensed and Certification Badge with prejudice.

As explained, the Administrative Court lack procedural due process and evidently proved that the decision of November 14, 2019 supported by insufficient evidence, and even assuming the allegations were proven, the resulting punishment of revoking Petitioner Driver Education Instructor's License and Certification Badge was unfair.

The United State Court of Appeals for the Fourth Circuit entered a decision in conflict with prior decisions from the Court of Special Appeals, Circuit Court of Prince Georges County, and the Administrative court. The Court of Appeals based solely on the same decisions that the courts as so far avoided the respectable, and ethical aspect of judicial proceedings. It is a fact that the courts have acted despicable in an unlawful manner that the Clerks, Judges and Chief judges of the courts connived with the Maryland Motor Vehicle Administration giving out FAKE Orders based on false findings and conclusion of the law in the case of Petitioner Driver Education Instructors licensed and Certification Badge. The Courts continuously denying and dismissing Petitioner's appeal to cover up Petitioner's \$5,000,000.00 (FIVE MILLION DOLLARS) compensation request to the courts against the Maryland Motor Vehicle Administration for both the Driver Education Instructors licensed and certification Badge, damages caused to Shepherds Driving School and its employees.

This case presents this Court with an opportunity to clarify the lower court "decisions" for not following the procedural due process in the case of the Driver Education Instructors licensed and Certification Badge. The constitutional laws were not followed. It is Petitioner's humble request that this court order the Maryland Motor Vehicle Administration to compensate Petitioner for lost income, wages, time, and money wasted, including Petitioner's credibility, defamation of character and the lack of credibility to teach Driver Education in the State of Maryland. This is a clear act of hate, discrimination, and prejudice by the Maryland Motor Vehicle Administration against a black owned female instructor and driving school owner,

graduated with no jobs, thriving to make ends meet, certified as a licensed Driver Education Instructor with no criminal history or any violations, revoked the Driver Education License not to conduct business in the State of Maryland.

The revocation of Petitioner's Driver Education Instructors Licensed, and Certification Badge has affected Petitioner both physical and financially in terms of getting a job and to be able to work for other driving schools in the State of Maryland. Also, Petitioner request that this court Reinstate the Driver Education instructors licensed and Certification Badge.

CONCLUSION

For these foregoing reasons, Petitioner respectfully request that this Court issue a Writ of Certiorari to review the decisions of the Maryland Court of Appeals.

DATED this day of August, 2021.

Respectfully submitted,

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