

Case No. 21-989

**THE SUPREME COURT
OF
THE UNITED STATES**

Jean Coulter, Petitioner

v.

Paul Laurence Dunbar Community Center,
et. al., Respondents

**On Petition for Certiorari
to the Third Circuit Court of Appeals**

**Petition for Reconsideration
of Denial of Writ of Certiorari**

Jean Coulter, Petitioner
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Philadelphia, PA 19101
412-616-9505

While it is most certainly true that the attentions of the United States Supreme Court are required to determine what path will be followed by the judiciary throughout the Land - it is **equally necessary** that the members of this, the **Nation's Highest Court**, make it clear to both the members of the Legal Profession as well as to the Public, that This Honorable Court will take the necessary steps to assure that the phrase "Freedom and Justice for all" is not merely an ideal available only to the Country's elite.

The Instant Matter is one where This Honorable Court must take a stand to reaffirm this Court's position in assuring that Justice is served for everyone, and not just for the "chosen few".

The Necessity for Rehearing in This Matter

Rehearing is required as This Honorable Court has chosen to defer to the judgment of both the Third Circuit and the District Court - despite the fact that Judge Schwab either (again) acted corruptly or perhaps fell victim to the deceptions/ falsifications of one of the individual defendants, Halle, (and his "personal non-profit") GYFF, as well as many of the other defendants. Then, upon the (highly biased) District Court's determination that he could "donate" \$50,000.00 from Coulter's assets, to benefit Halle and GYFF - the District Court also decided that Coulter must not be permitted to recover for any/all of the other claims (including Fraud in Inducement,

etc.), as doing otherwise would undermine the transfer of Coulter's assets to the bigoted, so-called "Christian" non-profit's coffers (and therefore also line the pockets of the "primary-bigot" defendant Halle (the "owner" of GYFF)).

Indeed, District Judge Schwab (who has an extensive history of publicly exposed biases), has again, clearly improperly, chosen to act outside of the law, as Judge Schwab chose to grant Summary Judgement exclusively based on Defendant Halle's testimony - despite both the testimony of defendant DiDomenico as well as the independent evidence (in the form of tax filings by the "bigoted non profit" which completely contradict Halle's testimony and consequently contradicting the District Court's "determination" as well.

Therefore, this Honorable Court must reconsider the decision to deny "Cert", because **This Honorable Court has not yet considered the extrinsic evidence (which was also presented in the District Court) - and those tax documents unequivocally prove that Halle's testimony was the result of a completely-self-serving forgeries, which were produced exclusively for the obvious purpose of "permitting" the District Court to improperly transfer \$50,000.00 of Coulter's money to defendant GYFF! It is also worth noting that GYFF is such a thoroughly corrupt "non-profit", that it is not permitted to receive government funds for use in any of GYFF's programs!**

Undisputed Extrinsic Evidence Proves that the
District Court's Decisions Must be Reversed

**The District Court chose to completely
ignore the testimony of Respondents
DiDomenico and Donnelly as well as Petitioner
Coulter - which prove that the "evidence"
which was presented by Halle was clearly the
result of forgery :**

"Q Well, let's get back to the decision to
rent part of an office at Grace Youth and
Family Foundation at their location on South
McCain Street. Do you have any memory
about how the budget for that was set?

A No. All I know is that Bill Halle
generously offered his place for us to go - sell
the building where you could get paid,

...

Q I'm asking, how did Dunbar decide to
spend \$50,000.00 after they closed with most
of it being spent on renting office space when
there were no employees, no activities, no
nothing? How did Dunbar view that as an
intelligent way to spend \$50,000.00? Yes.
Lorraine?

...

A. I don't know who decided that. I have
no clue.

Q So you don't remember there being an
agreement?

A. No.

Q That's fine.

A No, I don't."

Further, Coulter also presented to the District court (and hadn't previously included for This Court's review), independent evidence (the tax documents (990s) filed by Halle's personal non-profit (GYFF) proving that Halle's/GYFF's filings are/were forgeries - as well as questioning Halle about that evidence during Halle's deposition. (Copies of the pertinent sections of GYFF's actual tax filings appear on page 5.) Obviously, these tax documents clearly provide solid proof that the "paid invoices" submitted by Halle were indeed flagrant forgeries. (A copy of one of those Invoices appears on page 6) It is obvious that Halle never received payment in 2018 for "rent" (which incidentally was never agreed upon by any representative of Dunbar Community Center) - and thus, the supposed Invoices, and Halle's testimony are and were clearly fabricated simply to provide some possible basis for Judge Schwab to steal \$50,000.00 from Coulter, to assure that Coulter would "learn her place" - rather than the Federal Court even attempting to assure that Justice would be served!

Rehearing is Required

Perhaps This Honorable Court is unaware of Judge Schwab's reputation both among the professionals which appear before the District Court, as well as the Public at large. Judge Schwab is known for producing decisions which have no bearing on reality - and instead serve to only provide some form of perverse satisfaction for the jurist himself. Because Judge Schwab has a life-time appointment

Part III Statement of Program Service Accomplishments

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Check if Schedule O contains a response or note to any line in this Part III ☐

1 Briefly describe the organization's mission:

A non-denominational Christian Outreach meeting physical, emotional and spiritual needs of youth and their families through their participation in educational, artistic and recreational activities.

2 Did the organization undertake any significant program services during the year which were not listed on the prior Form 990 or 990-EZ? ☐ Yes ☒ No

If "Yes," describe these new services on Schedule O.

3 Did the organization cease conducting, or make significant changes in how it conducts, any program services? ☐ Yes ☒ No

If "Yes," describe these changes on Schedule O.

4 Describe the organization's program service accomplishments for each of its three largest program services, as measured by expenses. Section 501(c)(3) and 501(c)(4) organizations are required to report the amount of grants and allocations to others, the total expenses, and revenue, if any, for each program service reported.

4a (Code:) (Expenses \$ including grants of \$) (Revenue \$ 179,845)

FAITHBASED EDUCATION AND OUTREACH:

Missions training program, The Net Outreach 10,000 sq. ft. youth and community center, Community Outreach and Education

FAMILY STABILITY PROGRAMS:

Besor Brook homeless youth program, Carling Cases emergency resource program, Children's Summer Food Service and Activities

Program, Family Financial Services financial education, General Benevolent Program, Grace Child Care, Prison Aftercare Ministry,

homeless Winter Relief Center program, Youth and Family Counseling cognitive behavioral therapy.

Part VIII Statement of Revenue

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Check if Schedule O contains a response or note to any line in this Part VIII ☐

		(A) Total revenue	(B) Related or exempt function revenue	(C) Unrelated business revenue	(D) Revenue excluded from tax under sections 512-514
Contributions, Gifts, Grants and Other Similar Amounts	1a Federated campaigns	1a			
	b Membership dues	1b			
	c Fundraising events	1c			
	d Related organizations	1d			
	e Government grants (contributions)	1e			
	f All other contributions, gifts, grants, and similar amounts not included above	1f			
	g Noncash contributions included in lines 1a-1f \$	994			
	h Total. Add lines 1a-1f	994			
Program Service Revenue	2a Faith Based Education & Outreach	Business Code			
	b Family Stability Programs	21,930			
	c Counseling & Mentoring Programs	167,915			
	d D&A Education & Support Programs	945			
	e The Battleground	25,440			
	f All other program service revenue	15,464			
	g Total. Add lines 2a-2f	221,788			
3 Investment income (including dividends, interest, and other similar amounts)					
4 Income from investment of tax-exempt bond proceeds					
5 Royalties					
6a Gross rents	(i) Real				
	(ii) Personal				
	b Less: rental expenses				
	c Rental income or (loss)				
d Net rental income or (loss)					

Grace Youth and Family Foundation, Inc.

100 Center Avenue
Butler, PA 16001

Invoice

Date	Invoice #
10/24/2016	102416PLDCC

Bill To
Paul Laurence Dunbar Community Center 501 Fairground Hill Road Butler, PA 16001

PAID
10/25/21


6.

		P.O. No.	Terms	Project
		Due on receipt		
Quantity	Description	Rate		Amount
80	Financial and Accounting Services 2014 - 2015	50.00		4,000.00
30	Hours Property Maintenance and Office Move	25.00		750.00
25	Months Rent: October 1, 2014 - October 31, 2016 Includes Fully Furnished Private Office, Shared Use of Fully Furnished Reception Area, Education Meeting Space, Storage Area, Private Parking, Internet, Phone, Fax, Computer, Copier, Security, Business Software, Office Supplies/Resources and all	1,200.00		30,000.00

to the bench, the only way that this court can assure that Judge Schwab will not repeat his actions, is by overturning his decision, and returning the case to the Western District of Pennsylvania with instructions that judge Schwab not be permitted to be involved in any manner in the subsequent proceedings.

Thank you for your consideration of this matter.

Respectfully Submitted,




Jean Coulter, Petitioner

Certification of Unrepresented Party

I hereby certify that this Petition for Rehearing is restricted to the grounds not previously presented (as the Trial Court did not rule in the subsequent matter, until after the Petition for Writ of Certiorari had already been filed - and that it is presented in good faith and not for delay.

Respectfully Submitted,



Jean Coulter, Petitioner