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**ORDER OF THE SUPREME COURT OF THE
STATE OF MARYLAND DENYING PETITION
FOR A WRIT OF CERTIORARI
(DECEMBER 19, 2022)**

IN THE SUPREME COURT OF MARYLAND

IN THE MATTER OF GARY PFEFFER, JR.,

Petition Docket No. 269
September Term, 2022

(No. 7, Sept. Term, 2022
Appellate Court of Maryland)

(No. C-12-CV-22-000087
Circuit Court for Harford County)

Before: Matthew J. FADER, Chief Justice.

Upon consideration of the petition for a writ of certiorari to the Appellate Court of Maryland, it is this 19th day of December 2022, by the Supreme Court of Maryland,¹

¹ At the November 8, 2022 general election, the voters of Maryland ratified a constitutional amendment changing the name of the Court of Appeals to the Supreme Court of Maryland and the Court of Special Appeals of Maryland to the Appellate Court of Maryland. The name change took effect on December 14, 2022.

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ORDERED that the petition for writ of certiorari is DENIED as there has been no showing that review by certiorari is desirable and in the public interest.

/s/ Matthew J. Fader

Chief Justice

*Justice Eaves did not participate in the consideration of this matter.

**OPINION OF THE COURT OF SPECIAL
APPEALS OF THE STATE OF MARYLAND
(AUGUST 26, 2022)**

**UNREPORTED
IN THE COURT OF SPECIAL APPEALS
OF MARYLAND**

IN THE MATTER OF GARY PFEFFER, JR.

Circuit Court for Harford County
Case No. C-12-CV-22-000087

No. 7
September Term, 2022

Before: KEHOE, BEACHLEY, KENNEY, James A., III
(Senior Judge, Specially Assigned), JJ.

PER CURIAM

Gary Pfeffer, Jr., appellant, appeals from the dismissal, by the Circuit Court for Harford County, of his “Emergency Petition for Injunctive Relief or Any Other Remedy Available” (hereinafter “the petition”). For the reasons that follow, we shall affirm the judgment of the circuit court.

*This is an unreported opinion, and it may not be cited in any paper, brief, motion, or other document filed in this Court or any other Maryland Court as either precedent within the rule of stare decisis or as persuasive authority. Md. Rule 1-104.

In the petition, Mr. Pfeffer contended that in October 2021, his employer “mandated all employees to ‘fully vaccinate’ [for COVID-19] by the date of December 8, 2021, and in the interim employees who are not fully vaccinated, or will not disclose, must comply with testing requirements per site directions or be subjected to adverse actions, up to and including dismissal.” Mr. Pfeffer subsequently submitted to his employer a form titled “Conditional Acceptance,” in which he requested that his employer submit to him various forms of “proof” supporting its mandate. Mr. Pfeffer contended that his employer “chose[] to remain silent,” and “suffered a default as a consequence.” Mr. Pfeffer apparently declined to be vaccinated, after which his employer placed him on unpaid leave and threatened to terminate his employment. Mr. Pfeffer requested that he be awarded a variety of injunctive and financial relief. The court subsequently dismissed the petition on the ground that “it fail[ed] to state a claim for which relief may be granted within the jurisdiction of the [c]ourt, ex parte or otherwise.”

Mr. Pfeffer contends that the court erred in dismissing the petition, because the court was required to hold a hearing on the petition, and his employer is “in default and by virtue of silent acquiescence . . . in agreement that the alleged violations were committed against” him. But, Mr. Pfeffer does not cite any authority that prohibits an employer from requiring that its employees either be vaccinated against COVID-19 or “comply with testing requirements.” Mr. Pfeffer also does not cite any authority that supports his contention that his employer “defaulted” or somehow agreed to his allegations “by virtue of silent acquiescence.” Mr. Pfeffer failed to state a claim upon which

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the court could have granted relief, and hence, the court did not err in dismissing the petition.

**JUDGMENT OF THE CIRCUIT COURT
FOR HARFORD COUNTY AFFIRMED.
COSTS TO BE PAID BY APPELLANT.**

**MANDATE OF THE COURT OF SPECIAL
APPEALS OF THE STATE OF MARYLAND
(OCTOBER 18, 2022)**

**IN THE COURT OF SPECIAL APPEALS
OF MARYLAND**

IN THE MATTER OF GARY PFEFFER, JR.

No. 0007, September Term 2022

CSA-REG-0007-2022

Circuit Court No. C-12-CV-22-000087

On the 26th day of August, 2022, it was ordered
and adjudged by the Court of Special Appeals:

Judgment of the Circuit Court for Harford County
affirmed. Costs to be paid by appellant.

STATE OF MARYLAND, Sct:

I do hereby certify that the foregoing is truly
taken from the records and proceedings of the said
Court of Special Appeals. In testimony whereof, I have
hereunto set my hand as Clerk and affixed the seal of
the Court of Special Appeals, this 18th day of October,
2022.

/s/ Gregory Hilton

Clerk

Court of Special Appeals

**ORDER OF DISMISSAL OF THE CIRCUIT
COURT FOR HARFORD COUNTY
(FEBRUARY 10, 2022)**

**IN THE CIRCUIT COURT
FOR HARFORD COUNTY**

IN THE MATTER OF GARY PFEFFER, JR.,

Case No. C-12-CV-22-000087

Before: Angela M. EAVES, Administrative Judge.

Upon consideration of the Petition for Emergency Injunctive Relief or Any Other Remedy Available and the Motion for Ex Parte filed by Gary Pfeffer, Jr., it is this 10th day of February, 2022 by the Circuit Court for Harford County

ORDERED that this matter is hereby DISMISSED as it fails to state a claim for which relief may be granted within the jurisdiction of the Court, ex parte or otherwise; and it is further

ORDERED that this matter is statistically CLOSED.

/s/ Angela M. Eaves
Administrative Judge

**ORDER OF THE HARFORD COUNTY CIRCUIT
COURT OF THE STATE OF MARYLAND
DENYING MOTION FOR RECONSIDERATION
(FEBRUARY 22, 2022)**

**HARFORD COUNTY CIRCUIT COURT
OF MARYLAND**

Petitioner:

Gary Pfeffer Jr.
1122 Frenchtown Rd.
Perryville, Maryland

February 22, 2022

Treated as a motion
for reconsideration of
the dismissal of the
action, it is hereby
DENIED.
02/24/2022 6:07:33PM
/s/ Angela M. Eaves

**ATTENTION: ADMINISTRATIVE JUDGE ANGELA
M. EAVES AND ALL PARTICIPATING JUDGES OF
HARFORD COUNTY CIRCUIT COURT OF
MARYLAND**

20 West Courtland Street
Bel Air, Maryland - Circuit Court
Bel Air, MD 21014

**REGARDING: Ex Parte at Common Law Seeking
Lawful Remedy and Injunctive Relief Hand Delivered
to Clerk and sent via CERTIFIED MAIL**

READ THIS CAREFULLY

Dear Honorable Judge ANGELA EAVES,

I am writing in reference to your Order of
Dismissal for my Common Law Petition for Emergency

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Injunctive Relief, Case # C-12-CV-22-000087 dated February 10, 2022, ordered dismissed “as it fails to state a claim for which relief may be granted within the jurisdiction of the Court, *ex parte* or otherwise.”

Please see below the reasons I believe the Cecil County Circuit Court has jurisdiction to grant relief on this matter:

I filed in Harford County because I work at Aberdeen Proving Ground where the incident occurred (as opposed to Cecil County where I am domiciled.)

This is not a statutory case, but a common law case: my understanding is that the Circuit Court would have jurisdiction, as per Maryland Code of Courts and Judicial Proceedings, sec. I-501,

The circuit courts are the highest common-law and equity courts of record exercising original jurisdiction within the State.

As this is common law, there is no claim to be stated as there is no controversy between parties. This case has already been adjudicated because I have already given notice and opportunity and submitted the documentation of this I am filing a petition for injunctive relief so that relief may be granted.

As per the Bond case below, it states an individual's right to seek justice at their state court is protected Federally and any denial by the State to handle the matter at the appropriate jurisdiction would be enforceable Federally.

• *Bond v. US*, 564 U.S. 211 (2011), “Federalism also protects the liberty of all persons within a State by ensuring that laws enacted in excess of delegated governmental power cannot direct or control their

actions. *See ibid.* By denying any one government complete jurisdiction over all the concerns of public life, federalism protects the liberty of the individual from arbitrary power. **When government acts in excess of its lawful powers, that liberty is at stake.**”, and further;

- Supreme Court in *Bond v. US*, *supra*, states “An individual has a direct interest in objecting to laws that upset the constitutional balance between the National Government and the States when the enforcement of those laws **causes injury that is concrete, particular, and redressable.**”, and further;

Since attorneys are only used within the statutory system and this is a Common Law case, I am not using an attorney.

Based on my research and understanding, this court is the appropriate jurisdiction to rule on the case that has been dismissed. If after reviewing the above points, you feel you are not the appropriate judge to review this case, could you please direct me to the section of the Maryland Code of Courts and Judicial Proceedings that outlines the proper jurisdiction for this Common Law case?

The constitutional attorneys I have contacted are unwilling to accept any individual cases and are only focusing on large class action suits. The Common Law system remains in place for “we the people” to make use of to obtain justice even though it may not have been used in recent years. I appreciate your commitment as a judge of integrity to serve the people and your advocacy for children and civil rights for all.

Thank you for your consideration and prompt attention. Upon receipt, please respond to me directly

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as soon as possible due to the urgency of this matter. If within ten days I do not hear from you I will do a Notice of Appeal. I can be reached at (202) 894-0760 or by email at chemmy1981@gmail.com.

Very truly,

/s/ Gary Pfeffer Jr.

In Sui Juris Without Prejudice

/s/ James Reilly

Clerk

Court of Special Appeals

**EX PARTE CASE COVER SHEET
(FEBRUARY 9, 2022)**

HARFORD COUNTY CIRCUIT COURT OF THE
STATE OF MARYLAND

EX PARTE GARY PFEFFER, JR.

Petitioner

Case No.: C-12-CV-22-87

EX PARTE COVER SHEET

**EMERGENCY PETITION FOR INJUNCTIVE
RELIEF OR ANY OTHER REMEDY AVAILABLE**

Date:

Time:

Dept:

Judge:

EX PARTE GARY PFEFFER, JR., Petitioner

GERARD COTTER

(in His Personal/Private Capacity) EXECUTIVE
VICE PRESIDENT FOR CHIMES DC,

PAMELA MEADOWS

(in Her Personal/Private Capacity) CHIEF HUMAN
RESOURCES OFFICER FOR CHIMES DC,

JONI DORSETT

(in Her Personal/Private Capacity) DIRECTOR OF
HUMAN RESOURCES FOR CHIMES DC,

JOHN AND JANE DOE 1— 5000
(in His/Her Personal/Private Capacity)

This is a multiplicity suit by Petitioner.

1. Ex Parte Emergency Petition enumerates violations of Constitutionally protected and secured Rights of Petitioner and resulting harms/injury.
2. This case is NOT a complex case under Maryland Code and Court Rules (NOT within the statutory or policy jurisdiction). This is a case of original jurisdiction at Common Law ruled by NOTICE AND OPPORTUNITY from October 29, 2021 to December 31, 2021 in which GERARD COTTER, EXECUTIVE VICE PRESIDENT for CHIMES DC and CHIMES DC AGENTS following his directives chose to remain silent and not answer the redress of grievances presented to him by Petitioner.
3. Lawful remedies sought are Declaratory or Injunctive Relief based upon Exhibits 1 through 6.
4. Number of causes of action (violations) = 9
5. This case is NOT a class action suit.
6. Any known related cases = N/A

Respectfully Submitted,

/s/ Gary Pfeffer Jr.

Gary Pfeffer Jr., In Sui Juris

All Rights reserved, none waived,
and without prejudice.

Date: 2/9/2022

**[PROPOSED] ORDER OF THE HARFORD
COUNTY CIRCUIT COURT FOR EMERGENCY
INJUNCTIVE RELIEF OR ANY OTHER
LAWFUL REMEDY AVAILABLE
(FEBRUARY 9, 2022)**

Gary Pfeffer Jr.
1122 Frenchtown Road
Perryville, Maryland
In Sui Juris

**HARFORD COUNTY CIRCUIT COURT OF THE
STATE OF MARYLAND**

EX PARTE GARY PFEFFER, JR.,

Petitioner.

Case No. C-12-CV-22-87

**[PROPOSED] ORDER FOR EMERGENCY
INJUNCTIVE RELIEF OR ANY OTHER LAWFUL
REMEDY AVAILABLE**

EX PARTE GARY PFEFFER, JR., Petitioner

GERARD COTTER

**(in His Personal/Private Capacity) EXECUTIVE
VICE PRESIDENT FOR CHIMES DC,**

PAMELA MEADOWS

**(in Her Personal/Private Capacity) CHIEF HUMAN
RESOURCES OFFICER FOR CHIMES DC,**

JONI DORSETT
(in Her Personal/Private Capacity) DIRECTOR OF
HUMAN RESOURCES FOR CHIMES DC,

JOHN AND JANE DOE 1— 5000
(in His/Her Personal/Private Capacity)

PETITIONER, Gary Pfeffer Jr. appeared before this Honorable Court in this Ex Parte at Common Law with his Emergency Petition and sworn Declaration enumerating violations/crimes committed by COTTER, EXECUTIVE VICE PRESIDENT for CHIMES DC hereafter known as “COTTER,” and any and all JOHN AND JANE DOEs following the directives for the CHIMES DC, hereafter known as “CHIMES DC AGENTS,” seeking an ORDER FOR EMERGENCY INJUNCTIVE RELIEF or any other Lawful Remedy available.

As set forth in the Emergency Petition, Petitioner have suffered serious deprivation of unalienable Rights and Liberties, and are sustaining substantial on-going irreparable harms and also face imminent injury if this Court does not intervene regarding COTTER’s and CHIMES DC AGENTS’ unconstitutional/unlawful “COVID-19” “directives,” “orders,” “mandates,” “policies,” (such as “guidelines” for “physical distancing,” masking, testing, tracking, “status forms,” or “vaccinations”), and their egregious use of threats, duress, and coercion to force compliance with these “requirements” or be subjected to disciplinary action such as demotion, loss of pay/benefits or termination of employment.

Further, Petitioner provided COTTER and CHIMES DC AGENTS the due process right of reasonable opportunity to be heard and to correct their

violations of Law, and made honorable attempts to resolve this matter, but has been met with silence and contempt thus prompting this Court action.

Therefore, Petitioner, seeks relief for failure of COTTER and CHIMES DC AGENTS to safeguard his natural, unalienable, Constitutionally protected and secured Rights, and any other Rights, Privileges, and Immunities he might have; thus, moves with extreme urgency in this matter, and seeks EMERGENCY INJUNCTIVE RELIEF or any other Lawful Remedy available by this Court against COTTER, EXECUTIVE VICE PRESIDENT for CHIMES DC, as well as any agents of CHIMES DC following unlawful directives.

**IT IS HEREBY ORDERED THAT COTTER,
EXECUTIVE VICE PRESIDENT,
AND AGENTS FOR CHIMES DC:**

1. **Cease and Desist** in sending/delivering any and all further communications such as, notices, "directives," "orders," "mandates," requirements, and threats concerning COTTER and CHIMES DC AGENTS' unlawful requirement to **divulge personal and private medical information** by way of "COVID-19 Vaccination Status" or by any other means.

2. **Cease and Desist** in informing, noticing, ordering, directing, mandating, requiring or mentioning any requirement for Petitioner to be "**vaccinated**" as a **requirement for employment**, or face disciplinary action or termination.

3. **Cease and Desist** in informing, noticing, ordering, directing, mandating, requiring or mentioning any requirement for Petitioner to be **masked** in any

way as a requirement for employment, or face disciplinary action or termination (with the understanding that Petitioner reserves his right to utilize a mask at his own discretion under certain conditions which may arise from time-to-time in the performance of his professional duties).

4. **Cease and Desist** in informing, noticing, ordering, directing, mandating, requiring or mentioning any requirement for Petitioner to be **tested for “COVID-19”** in any way as a requirement for employment, or face disciplinary action or termination (unless Petitioner volunteers for said testing).

5. **Cease and Desist** in any further action against Petitioner whether disciplinary, retaliatory or in the nature of demotion or unpaid leave or termination of employment for failure to comply with unconstitutional/unlawful “directives,” “orders,” “mandates” or “policy” concerning the gathering of personal/private medical information through “COVID-19 Vaccination Status” or by any other means, as well as any and all requirements for “COVID-19” and “variants” including, but not limited to, “vaccinations,” testing and masking.

6. **Be held personally liable** for any fees and fines for damages pursuant to Petitioner’s fee schedule (\$200,000 US Dollars for violation of estoppel and bill for damages at a minimum rate of \$250,000 US dollars as well as \$2,000 US dollars per day per man or woman involved, plus any interest and penalties, which will continue to accrue until this matter is settled in full), as a result of activating and accepting the terms and obligations of said fee schedule (on December 13, 2021) due to continued unlawful activity

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and actions against Petitioner including the above-mentioned violations of his natural, unalienable, Constitutionally protected and secured Rights. (See Exhibits 5 through 7, incorporated by this reference as if fully restated herein).

IT IS SO ORDERED.

Sealed by my hand this _____ day of
_____, 2021.

The Honorable Angela M. Eaves, Judge

Respectfully Submitted,

/s/ Gary Pfeffer Jr. _____

All Rights reserved; none waived,
and without prejudice.

Date: 2/9/2022

FEE SCHEDULE

Fees Below as Referenced in Notice of Liability and Fee Schedule and Demand to Cease and Desist Document (Exhibit 5), apply to each person listed in Petition for Emergency Injunctive Relief (Gerard Cotter, Pamela Meadows, and Joni Dorsett)

Violation of Estoppel	\$200,000
Damages	\$250,000 minimum
Per Day, Per Man or Woman Involved	\$ 2,000

(as of Dec 13th which totals 58 calendar days as of February 9, 2022)

Fees began accruing on December 13, 2021 as per Exhibit 5, and are based on violation of freedoms, emotional distress and harm related to continual threats and coercion as well as damage to reputation at work, loss of medical privacy, suffering of petitioner and family due to lost income, common law legal workshop costs and consulting fees, loss of time for Petitioner and his wife to assemble court documents and file, loss of income and benefits, loss or reduction in future earning potential, defamation of character and possible jeopardizing petitioner's high level security clearance which affords a higher level of pay and career opportunities.

Fees will include interest and any penalties deemed reasonable by the court. Petitioner is willing to receive payment in two lump sums over a two year period if fees and damages to each man or woman involved are deemed in excess of \$500,000.

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Petitioner was precluded from working on December 8, 2022 and ordered to leave his work site. Petitioner's accrued paid time off was involuntarily exhausted by order of Chimes DC AGENTS after which Petitioner was placed on unpaid leave without benefits, and is currently in that status as of the date of this filing.

**PETITION FOR
EMERGENCY INJUNCTIVE RELIEF
(FEBRUARY 9, 2022)**

Gary Pfeffer Jr.
1122 Frenchtown Road
Perryville, Maryland
In Sui Juris

**HARFORD COUNTY CIRCUIT COURT OF THE
STATE OF MARYLAND**

EX PARTE GARY PFEFFER, JR.,
Petitioner.

Case No.: _____

**PETITION FOR EMERGENCY
INJUNCTIVE RELIEF**

**MEMORANDUM OF POINTS
AND AUTHORITIES – ATTACHED**

**GARY PFEFFER JR.’S SWORN DECLARATION IN
THE FORM OF AN AFFIDAVIT**

**PROPOSED EMERGENCY INJUNCTIVE
RELIEF OR ANY OTHER REMEDY
AVAILABLE**

Date:

Time:

Dept:

Judge:

GERARD COTTER
(in His Personal/Private Capacity) EXECUTIVE
VICE PRESIDENT FOR CHIMES DC,

PAMELA MEADOWS
(in Her Personal/Private Capacity) CHIEF HUMAN
RESOURCES OFFICER FOR CHIMES DC,

JONI DORSETT
(in Her Personal/Private Capacity) DIRECTOR OF
HUMAN RESOURCES FOR CHIMES DC,

JOHN AND JANE DOE 1— 5000
(in His/Her Personal/Private Capacity)

INTRODUCTION

COMES NOW, THE PETITIONER Gary Pfeffer Jr., hereinafter called “petitioner,” in Pro Per (“in one’s own proper person”), in Sui Juris (“of his own right”), NOT a pro se party in regard to this Emergency Petition. The petitioner, and those similarly situated hereto, seeks remedies at Common Law and NOT within the statutory or policy jurisdiction. This Honorable Court is to rule pursuant to the common law as stated *“The circuit courts are the highest common-law and equity courts of record exercising original jurisdiction within the State.”* Maryland Code of Courts and Judicial Proceedings, sec. 1-501.

Petitioner is the sole party in this Ex Parte at Common Law, whereas, according to Black’s Law Dictionary, Fourth Edition: *Ex parte means that an application is made by one party to a proceeding in the absence of the other. Thus, an ex parte injunction is one granted without the opposite party having had notice of the application. It would not be called “ex parte” if*

he had proper notice of it, and chose not to appear to oppose it. See Janin v. Logan. 209 Ky. 811. 273 S.W. 531, 532; Van Alen v. Superior Court in and for Los Angeles County, 37 Cal.App. 696, 174 P 672; Stella v. Mosele, 299 53, 19 N.E.2d 433, 435.

Petitioner is appearing before this Honorable Court with enumerated violations/crimes committed by GERARD COTTER, EXECUTIVE VICE PRESIDENT for CHIMES DC, hereafter known as "COTTER," for CHIMES DC and any and all JOHN AND JANE DOEs following the directives for CHIMES DC, hereafter known as "CHIMES AGENTS," which are currently being perpetrated against petitioner regarding serious deprivation of Rights, and hereby seeks immediate EMERGENCY INJUNCTIVE RELIEF as such acts, being unjust, inequitable and injurious to petitioner, and to those similarly situated to this Emergency Petition, cannot be adequately redressed by an action at Law.

These violations/crimes and resulting harms/injuries, arose from "COVID-19" "policy" requirements which COTTER attempted to enforce on employees without the **Lawful authority** to do so. In regard to any and all "COVID-19" "policies," "directives," "orders," or "mandates" (such as "guidelines" for "physical distancing," masking, testing, tracking, "status forms," or "vaccinations," etc.), there is no actual Law that has been passed by the State or Federal Legislature that requires employees to comply, or compels employees to consent to the violation of their natural, unalienable, Constitutionally protected and secured Rights. In fact, no "law" may infringe upon or violate individual Rights, whereas "*The Constitution is the supreme law of the land Any law that is repugnant to the*

Constitution is null and void... The Constitution supersedes all other laws and individual rights shall be liberally enforced in favor of him, the clearly intended and expressly designated beneficiary" *Marbury v. Madison*, 5 U.S. 137 (1803), and "Where rights secured by the Constitution are involved, there can be no rule making or legislation which would abrogate them." *Miranda v. Arizona*, 384 U.S. 436. 491 (1966). Further, "Every man is independent of all laws, except those prescribed by nature. He is not bound by any institutions formed by his fellow-men, without his consent." *Cruden v. Neale*. 2 NC 338. 339 (1796).

The "directives," "orders," "mandates," or "guidelines" of a governor, mayor, or agent or officer for a city/county/state/health department, etc. are not Law, and public "policy" cannot infringe upon or violate the Rights or liberty of the People. Whereas "No public policy of a state can be allowed to override the positive guarantees of the US. Constitution [for the United States of America]." 16 Am Jur 2d, Const. Law, Sect 70. Further, "The term [liberty]... denotes not merely freedom from bodily restraint, but also the right of the individual to contract, to engage in any of the common occupations of life, to acquire useful knowledge, to marry, to establish a home and bring up children, to worship God according to the dictates of his own conscience... The established doctrine is that this liberty may not be interfered with, under the guise of protecting public interest." Meyer v. Nebraska, 262 US 390. 399. 400 (1923) and "Encroachments on the liberty of the citizen cannot be tolerated even though the general result sought is a beneficent one. Ex Parte Arata, (App. 2 Dist. 1921) 52 Cal.Appl 380. 198 p. 814.

SEE ALSO MEMORANDUM OF POINTS AND AUTHORITIES ATTACHED.

Background and Scope of Violations/Crimes

This Emergency Petition enumerates the violations/crimes and resulting harms/injuries which COTTER and CHIMES AGENTS are perpetrating against all current employees of CHIMES DC, STATE OF MARYLAND including petitioner using threat, duress, and/or coercion in order to force said employees into giving up/relinquishing certain unalienable Rights which according to the Maryland Constitution and the Constitution for the United States of America and the Bill of Rights is prohibited by Law.

Black's Law Dictionary, Fourth Edition, defines DURESS: "*Unlawful constraint exercised upon a man whereby he is forced to do some act that he otherwise would not have done . . . where the person is deprived of his liberty in order to force him to compliance... threats of bodily or other harm, or other means amounting to or tending to coerce the will of another, and actually inducing him to do an act contrary to his free will.*" See Heider v. Unicume, 142 Or. 410.20 P.2d 384, 385; Shlensky v. Shlensky, 369 Ill. 179. 15 N.E.2d 694. 698. And, defines COERCION: "*Compulsion; constraint; compelling by force . . . where one party is constrained by subjugation to other to do what his free will would refuse.*" See Metro-Goldwyn-Mayer Distributing Corporation v. Cocke, Tex.Civ.App., 56 S.W.2d 489; Fluharty v. Fluharty, Del. Super., 8 W.W.Harr. 487, 193 A. 838, 840; Santer v. Santer, 115 Pa.Super. 7, 174 A. 651, 652.

COTTER originally notified all employees of CHIMES DC, STATE OF MARYLAND on or about

October 12, 2021 and mandated all employees to “fully vaccinate” by the date of December 8, 2021, and in the interim employees who are not fully vaccinated, or will not disclose, must comply with testing requirements per site directions or be subjected to adverse actions, up to and including dismissal. The “vaccination” requirements deadline for petitioner, was October 11, 2021 to begin vaccination protocols with “Moderna,” October 18, 2021 as last possible day to begin vaccination protocols with “Pfizer”, and December 8, 2021 as last possible day to receive “final dose in a two-dose vaccine regimen” or receive the “Johnson & Johnson one-dose vaccine”. (See Exhibit 9, incorporated by this reference as if fully restated herein).

Employees were informed a request for a religious accommodation required clear statement of sincerely held religious belief, name of the religion, and identification of any religious practice guiding objection to immunization including citation of religious texts or supporting documentation from a religious authority. Employees were ordered to “identify if they have received vaccinations in the past and, if so, why COVID 19 vaccination poses any particular concerns.” CHIMES DC policy states “Individuals granted an accommodation or exemption should be prepared to submit proof on a recurring basis, of negative test if required, to meet specific job site requirements.” Petitioner was informed he would be subject to mandatory COVID 19 weekly testing (2-3 times per week) at his own cost even if CHIMES DC granted a request for a religious accommodation.

In response to these unlawful mandates, petitioner served upon COTTER and CHIMES DC AGENTS (Notice to Principal is Notice to Agent, Notice to Agent

is Notice to Principal) a CONDITIONAL ACCEPTANCE dated October 12, 2021 and COURTESY NOTICE dated October 29, 2021. COTTER and CHIMES DC AGENTS were provided proper notice and reasonable opportunity to respond. (See Exhibits 1 and 2, incorporated by this reference as if fully restated herein).

Public servants in positions of trust (including officers of public and private companies who were given authority to uphold the constitution through state and government officials and given that CHIMES DC has accepted state and federal funds) have a duty to timely respond. However, COTTER and CHIMES DC AGENTS have chosen to remain silent on the CONDITIONAL ACCEPTANCE and COURTESY NOTICE and have suffered a default as a consequence, as they had a legal and moral obligation to speak, to wit: *“Silence can only be equated with fraud when there is a legal and moral duty to speak or when an injury left unanswered would be intentionally misleading.”* U.S. v. Prudden, 424 F.2d 1021 (1970); U.S. v. Tweel, 550 F.2d 297, 299 (1977), and further, *“A default is an omission of that which ought to be done, and more specifically, the omission or failure to perform a legal duty. The term also embraces the idea of dishonesty; or an act or omission discreditable to one’s profession.”* Black’s Law Dictionary; Fourth Edition. As a result of their silence, COTTER and CHIMES DC AGENTS initiated the “Doctrine of Estoppel by Acquiescence” which is now in full force and effect upon them, to wit: *“One’s ‘silence’ may invoke doctrine of Estoppel by acquiescence.”* Carmine v. Bowen, 64 A. 932 (1906). (See NOTICE OF DEFAULT dated November 3, 2021 and NOTICE OF

ESTOPPEL dated December 8, 2021, Exhibit 3 and 4, incorporated by this reference as if fully restated herein).

Petitioner, and those similarly situated hereto, provided COTTER and CHIMES DC AGENTS the due process right of notice and opportunity to be heard and to correct violations of Law and restrict their actions to the limits placed upon them by the State and Federal Constitution. Due process requirements have been fully satisfied in this matter, whereas, Black's Law Dictionary, Fourth Edition defines DUE PROCESS OF LAW: "*Law of the land*," "*due course of law*," and "*due process of law*" are synonymous... *The essential elements of "due process of law" are notice and opportunity to be heard and to defend . . .*" See Dimke v. Finke, 209 Minn. 29, 295 N.W. 75, 79; Di Maio v. Reid, 13 N.J.L. 17, 37 A.2d 829, 830; People v. Skinner, Cal., 110 P.2d 41, 45; State v. Rossi, 71 R.I. 284, 43 A.2d 323, 326; Stoner v. Higginson, 316 Pa. 481, 175 A. 527, 531.

The petitioner made a choice to risk his life and fortune for the public, yet COTTER and CHIMES DC AGENTS chose to stand mute and would not timely, properly or honorably respond to the CONDITIONAL ACCEPTANCE (see Exhibits 1 through 4, incorporated by this reference as if fully restated herein). Lack of timely response resulted in tacit agreement with petitioner, and those similarly situated hereto, including that COTTER and CHIMES DC AGENTS do not have any proof of claim regarding their offer or any Lawful authority in this matter concerning "COVID-19" "policies," "directives," "orders" and "mandates." Whereas, "tacit" is defined by Ballentine's Law Dictionary, Third Edition: "Silent;

not expressed; implied;" and by Bouvier's Law Dictionary, 14 Edition, Vol II: "*That which although not expressed, is understood from the nature of the thing or from the provision of the law; implied;*" and by Black's Law Dictionary, Fourth Edition: "*Existing, inferred, or understood without being openly expressed or stated, implied by silence or silent acquiescence, understood, implied as tacit agreement, a tacit understanding.*" See State v. Chadwick. 150 Or. 645, 47 P.2d 232, 234 (1935).

Although COTTER and CHIMES DC AGENTS were noticed by petitioner of their Default and Estoppel, served upon them on November 3, 2021 and December 8, 2021, they have ignored such and continue to generate new "directives," "orders," "mandates," and enforcement deadlines concerning the requirement of all employees of CHIMES DC for submitting "COVID-19 Vaccination Status" and adhering to "vaccination" requirements, or be subjected to disciplinary action including being put on unpaid leave or termination of employment. (See Exhibits 14, 15, 17, and 19, incorporated by this reference as if fully stated herein). As a result of their continued unlawful activity and actions against petitioner, and those similarly situated hereto, COTTER and CHIMES DC AGENTS violated the Estoppel on or about December 8, 2021 as well as petitioner's repeated demands to cease and desist, thereby accepting and activating the terms and obligations of petitioner's fee schedule for damages on December 13, 2021 (\$200,000 US Dollars for the violation of the estoppel and bill for damages at a minimum rate of \$250,000 US dollars as well as \$2,000 US dollars per day per man or woman involved, plus any interest and penalties, until the matter is settled in

full), for which COTTER and CHIMES DC AGENTS are personally liable and petitioner now has a Lawful claim before this Honorable Court. (See Exhibits 4 through 6, incorporated by this reference as if fully restated herein).

Consequently, COTTER and CHIMES DC AGENTS did place petitioner on unpaid leave prior to exhausting petitioner's vacation pay without permission. Petitioner is currently on unpaid leave, received threats of termination effective January 24th 2022 and continues facing possible termination which constitutes a clear, present, and impending danger to the Rights and liberties of all CHIMES DC employees who have not volunteered. Because COTTER and CHIMES DC AGENTS have continued to violate the Law and the Rights of their employees by implementing enforcement of their draconian "directives," "orders," "mandates," and "policies" without Lawful authority or the opportunity for the employees to be heard or for the matter to be debated, serious deprivation of all employees' Rights has taken place.

ENUMERATION OF VIOLATIONS/CRIMES

"COVID-19" "directives," "orders," "mandates," and "policies" (such as "guidelines" for "physical distancing," masking, testing, tracking, "status forms," or "vaccinations," etc.) for employees of CHIMES DC violate at minimum The Declaration of Rights of the Maryland Constitution (1867) The Preamble, Articles 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 13, 17, 19, 24, 36, 40, and 44 as well as the FIRST, FOURTH and FIFTH AMENDMENTS to the Constitution for the United States of America (Bill of Rights).

Petitioner has suffered serious deprivation of Rights and Liberties, and is sustaining on-going irreparable harms and also faces imminent injury if this Court does not intervene and provide EMERGENCY INJUNCTIVE RELIEF and Lawful Remedy. The violations/crimes and resulting harms/injuries perpetrated by COTTER and CHIMES DC AGENTS against the petitioner which are enumerated in the employee's sworn Declarations, include but are not limited to the following:

VIOLATION/CLAIM #1:

COTTER and CHIMES DC AGENTS have caused and continue to cause harm, injury, and trespass upon petitioner's unalienable Constitutionally protected and secured Rights on an ongoing basis using threat, duress, and coercion, thereby elevating the nature and seriousness of their violations against petitioner.

CLARIFICATION:

By COTTER and CHIMES DC AGENTS declaring their intentions to injure and deprive petitioner of his liberty in order to force him to compliance by compelling or coercing him to do some act contrary to his free will, and in violation of his unalienable Rights, constitutes a serious trespass upon petitioner and his unalienable Rights. Their declarations show forethought and malice indicating a conscious violation of the Law fatally bent on mischief, admitting their intentions to work injury to the person, property, and Rights of petitioner, to inflict punishment, loss, and pain upon him by seizing and detaining certain unalienable Rights (which includes, but not limited to petitioner's freedom of religion; physical body; free

will; mind; and soul), and then requiring some act as a condition for the surrender of petitioner's Rights, which is tantamount to the crime of extortion.

Concerning COTTER and CHIMES DC AGENTS requirement for petitioner to submit "COVID-19 Vaccination Status" divulging his personal and private medical information, as well as fulfilling their requirement for petitioner to take a "vaccination" by December 8, 2021 or undergo mandatory recurring COVID 19 weekly testing, this has caused a menace or threat of such a nature and extent as to unsettle the mind of petitioner, in order to take away petitioner's free and voluntary action which alone constitutes petitioner's consent. COTTER and CHIMES DC AGENTS have made it clear and admitted that they intend to inflict punishment upon petitioner for non-compliance in the form of disciplinary action including being put on unpaid leave or termination of employment, which constitutes a loss that would inflict pain upon petitioner, which is a threat to work injury to petitioner's person, property, and Rights, with the view of restraining petitioner's freedom of action.

Further, COTTER and CHIMES DC AGENTS are using duress for an unlawful purpose tending to coerce the will of petitioner and actually inducing him to do an act contrary to his will. Here, COTTER and CHIMES DC AGENTS are committing a tortious seizure and detention of petitioner's liberty and unalienable Rights consisting of, but not limited to freedom of religion; physical body; free will; mind; and soul of the petitioner who is entitled to these Rights, and then inducing/forcing petitioner to do an act, such as divulging personal and private medical information and getting the so-called "vaccination," contrary to his

FIRST, FOURTH, and FIFTH AMENDMENT Rights, the Law, his conscience, and better judgment. If petitioner, relinquishes these Rights due to threat, duress, and coercion, he no longer owns, nor remains in control of his freedom of religious belief; physical body; free will; mind; and soul as he would now be subject to the style of religion or belief system, will, and control of COTTER and CHIMES DC AGENTS. This clearly constitutes Duress of Imprisonment by unlawfully restraining and depriving petitioner of his liberty in order to force compliance upon him regarding "COVID-19 Vaccination Status" and "vaccination" requirements.

It is clear that COTTER and CHIMES DC AGENTS, by use of coercion are forcing submission in a vigorous or forceful manner to constrain petitioner by subjugation to them in order to get petitioner to do what his free will would naturally otherwise refuse to do. The use of threat, duress, and coercion being perpetrated against petitioner, in order to force him to surrender his unalienable Rights and dignity, elevates the nature and seriousness of these wicked and wanton acts on the part of COTTER and CHIMES DC AGENTS. Again, the threat of punishment, the loss of employment/livelihood, decrease in future earning potential, and the pain associated with these, as well as the pain already inflicted by such threats, duress, and coercion causing the unsettling of petitioner's mind and body verifies the on-going harm, injury, and trespass committed against petitioner.

VIOLATION/CLAIM #2:

COTTER and CHIMES DC AGENTS are creating an unsafe and hostile work environment for petitioner.

CLARIFICATION:

COTTER and CHIMES DC AGENTS have created an unsafe and hostile work environment for petitioner including ongoing incidents of harassment, religious discrimination, and disrespect of privacy, harm to reputation, etc. as well as repeated threats of demotion, loss of pay and termination of employment (“get vaccinated or be fired”) for noncompliance with unlawful “COVID-19” “directives,” “orders,” “mandates” and “policies” (such as “guidelines” for “physical distancing,” masking, testing, tracking, “status forms” or “vaccinations”). There seems to be a deliberate and persistent campaign on the part of COTTER and CHIMES DC AGENTS to use threats, duress, and coercion in an attempt to force petitioner to relinquish certain unalienable, Constitutionally protected and secured Rights and bend to the will of CHIMES DC regarding “vaccination” requirements. This hostile work environment and infringements upon individual liberties is an actual ongoing harm and employees also face additional imminent injury of pay/job loss for noncompliance. CHIMES DC AGENTS placed Petitioner on unpaid leave as of December 31st 2021 after first involuntarily exhausting his accrued paid time off and notified him he will be terminated as of January 24th 2022 if he does not submit to their unlawful demands. Petitioner is at risk of being able to provide food and shelter for him and his family due to loss of income and employment.

VIOLATION/CLAIM #3:

COTTER and CHIMES DC AGENTS are violating petitioner’s Right respecting the establishment of religion.

“Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof . . .”

—Constitution for the United States of America,
FIRST AMENDMENT

CLARIFICATION:

It is petitioner's religious belief that he has been made free by his Creator, thus he is not a servant of the government or of men, to wit, “. . . be not ye the servants of men.” I Corinthians 7:23. To be true to his Creator and religion, petitioner must reject being brought under subjugation of others, to wit: “*Stand fast therefore in the liberty wherewith [Creator] hath made us free, and be not entangled again with the yoke of bondage.*” Galatians 5:1. Any attempt to alter petitioner's relationship with his Creator by mandating/ requiring something contrary to his own established religion, is in reality COTTER and CHIMES DC AGENTS imposing the establishment of their own style of religion or belief system, that of man-made control and domination, contrary to the FIRST AMENDMENT prohibition to do so upon petitioner, which is unlawful.

Here COTTER and CHIMES DC AGENTS are attempting to seize control over petitioner's free will and freedom of choice of religion and belief system and impose their own will and belief system upon him, by using threats, duress, and or coercion to force compliance with unlawful “directives,” “orders,” “mandates” and “policies,” which is an actual and immediate harm. Petitioner objects to being forced by COTTER and CHIMES DC AGENTS to convert his longstanding and proper role as master of his own religion, body,

mind, will, and soul to that of a servant of government and of men, and submit his will to COTTER and CHIMES DC AGENTS rather than follow his own conscience as guided by his Creator, and accept the belief system of COTTER and CHIMES DC AGENTS against his will and better judgment, thereby causing him to turn his back on his Creator, and comprise the eternal impact of his choices and his relationship with his Creator whom he relies upon for his life, protection and sustenance beyond all matters of men, to wit; *"The laws of nature are the laws of God; whose authority can be superseded by no power on earth. A legislature must not obstruct our obedience to him from whose punishments they cannot protect us. All human constitutions which contradict his laws, we are in conscience bound to disobey. Such have been the adjudications of our courts of justice."* Robin v. Hardaway Cite as: Jeff. 109, 1772 WL 11 (Va.Gen.Ct.), page 6, 1772, In the General Court of Virginia. Petitioner's freedom of religion is at stake here if he is being forced to subscribe to another belief system that conflicts with his own and participate in ways that are unconscionable and against his religion.

And further, as per petitioner's sincerely held religious belief: private, personal, and medical information, as protected by law, is not the business of COTTER and CHIMES DC AGENTS, nor does this information have any bearing on petitioner's ability to perform his duties as an employee of CHIMES DC. It is petitioner's sincerely held religious belief that he keep said information private and not share it with those who do not have his best interests at heart, which is his right.

VIOLATION/CLAIM #4:

COTTER and CHIMES DC AGENTS are violating petitioner's Right to freedom of choice and free exercise of religion.

“Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof . . .”

— Constitution for the United States of America, FIRST AMENDMENT and Maryland Constitution (1867), Declaration of Rights, Article 36.

CLARIFICATION:

COTTER and CHIMES DC AGENTS are attempting to prohibit petitioner from the free exercise of his own religion through use of threat, duress, and/or coercion, to require him to comply with unlawful “COVID-19” “directives,” “orders,” “mandates” or “policies” which are contrary to his own religious beliefs and an infringement and violation of his religion body, mind, will, and soul. *“Religious beliefs need not be acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection.”* Thomas v. Rev. Bd. Of Ind. Emp. Sec. Div., 450 U.S. 707, 714 (1981). See also Church of the Lukumi Babalu Aye. Inc. v. City of Hialeah, 508 U.S. 520, 531 (1993).

Secondly, it is petitioner's strong religious belief and stance that injecting a foreign potentially harmful and deadly substance into his body is not what his Creator desires for him, to wit: 16 *“Know ye not that ye are the temple of God, and [that] the Spirit of God dwelleth in you?”* I Corinthians 3:16. It is petitioner's religious Right and belief to put his trust in his

Creator to help him decide for himself what he will and will not put or allow to be put into his body. Government or corporations do not have the Lawful right to make medical or product consumption decisions for the People.

It is petitioner's strong religious belief that where a human being's "vaccination status" does not have any bearing on that individual's ability or inability to transmit a virus, that it is immoral and unethical to declare one group unclean and discriminate against them by coercing them to wear masks and/or submit to mandatory testing and tracking and sharing of their private medical information while another group is declared "clean" and afforded the privilege of their God-given and unalienable rights and freedoms going unchallenged, and it is against petitioner's belief to participate or facilitate in this discrimination, to wit: 15 "...*Do not call anything impure that God has made clean.*" Acts 10:15 NIV.

The mere notion that a public servant or corporate entity with a financial interest has any claim of "authority" to decide what is right for others and then force their will on these others by holding their Rights and liberties ransom through the use of threat, duress, and or coercion is not only reprehensible but flies in the face of the founding principles upon which this great nation was founded — LIBERTY, FREEDOM, and FREE WILL and CHOICE! The purpose of the FIRST AMENDMENT of the Bill of Rights is to protect petitioner against any unlawful intrusion into his life and religion, and it also serves as a PROHIBITION against government intrusion into religious affairs.

VIOLATION #5:

COTTER and CHIMES DC AGENTS are violating petitioner's, Right to petition the government for a redress of grievances.

“Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.”

—Constitution for the United States of America,
FIRST AMENDMENT

“That every man hath a right to petition the Legislature for the redress of grievances in a peaceable and orderly manner.”

—Maryland Constitution (1867), Declaration of Rights,
Article 13.

CLARIFICATION:

Although as public servants COTTER and CHIMES DC AGENTS were given proper notice and reasonable opportunity to respond where they had a legal and moral duty to speak, they have chosen to remain silent on petitioner's CONDITIONAL ACCEPTANCE (see Exhibit 1, incorporated by this reference as if fully restated herein); consequently, COTTER and CHIMES DC AGENTS now stand in DISHONOR. As this CONDITIONAL ACCEPTANCE enumerates petitioner's concerns and grievances, he feels that his FIRST AMENDMENT Right to petition the government for redress of grievances is being violated by COTTER'S and CHIMES DC AGENTS'

silence as well as a fraud being perpetrated upon him, to wit, *“Silence can only be equated with fraud when there is a legal and moral duty to speak or when an injury left unanswered would be intentionally misleading.”* U.S. v. Prudden, 424 F.2d 1021 (1970); U.S. v. Tweel, 550 F.2d 297, 299 (1977). Further, COTTER and CHIMES DC AGENTS continue to issue “directives,” “orders” and “mandates” concerning “COVID-19 Vaccination Status” and “vaccination” requirements OR mandatory weekly testing under threat, duress, and/or coercion, even after COTTER’S and CHIMES DC AGENTS’ acquiescence and tacit agreement to petitioner’s position due to COTTER’S and CHIMES DC AGENTS’ silence and being served with petitioner’s NOTICE OF DEFAULT (Exhibit 3, incorporated by this reference as if fully restated herein) and NOTICE OF ESTOPPEL (Exhibit 4, incorporated by this reference as if fully restated herein).

VIOLATION/CLAIM #6:

COTTER and CHIMES DC AGENTS are violating petitioner’s Right to be secure in his persons, houses, papers, and effects against unreasonable searches and seizures, with regards to “COVID-19 Vaccination Status” and giving up personal and private medical information contrary to Law.

“The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated . . .”

—Constitution for the United States of America, FOURTH AMENDMENT and The Declaration of Rights of the Maryland Constitution (1867), Article 24.

CLARIFICATION:

COTTER and CHIMES DC AGENTS are seizing petitioner's "persons," "papers," and "effects" (belongings, property, Rights, information in one's head, what one knows, etc.) against his will through use of threat, duress, and/or coercion and then unreasonably and unlawfully searching his "persons," "papers," and "effects," and then unlawfully seizing his personal and private information, and then using said information against him. This is a clear violation of petitioner's FOURTH AMENDMENT Rights. Further, private, personal, and medical information, as protected by Law, is not the property of COTTER and CHIMES DC AGENTS, nor does this information have any bearing on petitioner's ability to perform duties as an employee of CHIMES DC.

VIOLATION/CLAIM #7:

COTTER and CHIMES DC AGENTS are violating petitioner's Right to be secure in his person, houses, papers, and effects against unreasonable searches and seizures, with regards to "vaccination" requirements.

"The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated . . ."

—Constitution for the United States of America, FOURTH AMENDMENT and The Declaration of Rights of the Maryland Constitution (1867), Article 24.

CLARIFICATION:

Petitioner has a Right to be secure in his "persons," "papers," and "effects" (belongings, property,

Rights, information in one's head, what one knows, etc.). COTTER and CHIMES DC AGENTS are attempting to seize control of, not only petitioner's physical body, but his will as well. If COTTER and CHIMES DC AGENTS can force petitioner to take the so-called "COVID 19" "vaccination" (OR submit to mandatory COVID 19 tests 2-3 times per week) then this is *prima facie* evidence of the actual seizure and control of his body and will by COTTER and CHIMES DC AGENTS, which means he has lost control and ownership of his own body through COTTER'S and CHIMES DC AGENTS' use of threat, duress, and or coercion against petitioner, meaning he no longer would be permitted to make personal lifestyle choices for himself. This is a clear violation of petitioner's FOURTH AMENDMENT Rights. Clearly, COTTER and CHIMES DC AGENTS are refusing to recognize and honor petitioner's, and those similarly situated hereto, unalienable Rights that he is entitled to and is systematically denying and destroying his ability to remain secure in his Rights, even in off-duty capacities. Again, this is tantamount to the seizure and control of petitioner's physical body, mind, will, and soul, all of which are his private property.

VIOLATION/CLAIM #8:

COTTER and CHIMES DC AGENTS are violating petitioner's Right to not be compelled to testify against himself.

"No person . . . shall be compelled . . . 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."

—Constitution for the United States of America,
FIFTH AMENDMENT

CLARIFICATION:

COTTER and CHIMES DC AGENTS are unlawfully demanding/requiring, by use of threat, duress, and or coercion that petitioner submit “COVID-19 Vaccination Status” revealing personal and private medical information which would be the same as being compelled to testify against himself, which has direct and immediate consequences such as breach of privacy, segregation, hostility and/or harassment from supervisors and co-workers, etc. This is a clear violation of his FIFTH AMENDMENT Right.

VIOLATION/CLAIM #9:

COTTER and CHIMES DC AGENTS are violating petitioner's, and those similarly situated hereto, Right not to be deprived of life, liberty or property, without due process of Law.

“No person . . . shall be compelled . . . 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.”

— Constitution for the United States of America, FIFTH AMENDMENT and The Declaration of Rights of the Maryland Constitution (1867), Article 24.

CLARIFICATION:

COTTER and CHIMES DC AGENTS are denying petitioner's Right to due process of law by using threat, duress, and or coercion to get him to turn over to

COTTER and CHIMES DC AGENTS his life, liberty, and property. The fact that COTTER and CHIMES DC AGENTS are attempting to get petitioner to turn over control of his life, liberty, and property against his consent, in the form or in the nature of petitioner's will, what is in his head, his decision making, and his physical body, even in off-duty capacity, under threat of disciplinary action including being put on unpaid leave and/or termination of employment is not due process of Law as guaranteed by FIFTH AMENDMENT Rights. Loss of petitioner's livelihood, income and/or employment constitutes a material harm and deprivation of property in the sense that petitioner would be forced to forfeit the investment he has made in his career as well as future earnings and promotions he might obtain during the remainder of his tenure with CHIMES DC.

EMERGENCY RELIEF SOUGHT

Therefore, petitioner seeks relief for failure of COTTER'S and CHIMES DC AGENTS to safeguard his natural, unalienable, Constitutionally protected and secured Rights, and any other Rights, Privileges, and Immunities he might have; thus, moves with extreme urgency in this matter, and seeks EMERGENCY INJUNCTIVE RELIEF or any other Lawful Remedy available by this Court against COTTER, EXECUTIVE VICE PRESIDENT for CHIMES DC, and DORSETT, DIRECTOR OF HUMAN RESOURCES for CHIMES DC, as well as any agents of CHIMES DC following unlawful directives, ordering them to:

1. **Cease and Desist** in sending/delivering any and all further communications such as, notices, "directives," "orders," "mandates," requirements, and

threats concerning COTTER'S and CHIMES DC AGENTS' unlawful requirement to **divulge personal and private medical information** by way of "COVID-19 Vaccination Status" or by any other means.

2. **Cease and Desist** in informing, noticing, ordering, directing, mandating, requiring or mentioning any requirement for petitioner to be "**vaccinated**" as a requirement for employment, or face disciplinary action, unpaid leave, or termination.

3. **Cease and Desist** in informing, noticing, ordering, directing, mandating, requiring or mentioning any requirement for petitioner, and those similarly situated hereto, to be **masked** in any way as a requirement for employment, or face disciplinary action or termination (with the understanding that petitioner reserves his right to utilize a mask at his own discretion under certain conditions which may arise from time-to-time in the performance of his professional duties).

4. **Cease and Desist** in informing, noticing, ordering, directing, mandating, requiring or mentioning any requirement for petitioner to be **tested for "COVID-19"** in any way as a requirement for employment, or face disciplinary action or termination (unless petitioner, and those similarly situated hereto, volunteers for said testing).

5. **Cease and Desist** in any further action against petitioner, and those similarly situated hereto, whether disciplinary, retaliatory or in the nature of demotion or unpaid leave or termination of employment for failure to comply with unconstitutional/unlawful "directives," "orders," "mandates" or "policy" concerning the gathering of personal/private medical information through "COVID-19 Vaccination Status" or by

any other means, as well as any and all requirements for “COVID-19” and “variants” including, but not limited to, “vaccinations,” testing and masking.

6. **Be held personally liable** for any fees and fines for damages pursuant to petitioner’s, and those similarly situated hereto, fee schedule (\$200,000 US Dollars for violation of estoppel and bill for damages at a minimum rate of \$250,000 US dollars as well as \$2,000 US dollars per day per man or woman involved, plus any interest and penalties, which will continue to accrue until this matter is settled in full), as a result of activating and accepting the terms and obligations of said fee schedule (on December 13, 2021) due to continued unlawful activity and actions against petitioner including the above-mentioned violations of his natural, unalienable, Constitutionally protected and secured Rights. (See Exhibits 4 through 6, incorporated by this reference as if fully restated herein).

All Rights reserved; none waived, and without prejudice.

Respectfully Submitted,

/s/ Gary Pfeffer Jr.

Gary Pfeffer Jr., In Sui Juris

Date: 2/9/2022

**LETTER TO CIRCUIT COURT JUDGE
(JANUARY 21, 2022)**

Petitioner:

Gary Pfeffer Jr.
1122 Frenchtown Rd.
Perryville, Maryland

ATTENTION: ADMINISTRATIVE JUDGE ANGELA M. EAVES
AND ALL PARTICIPATING JUDGES OF HARFORD COUNTY
CIRCUIT COURT OF MARYLAND
20 West Courtland Street,
Bel Air, Maryland - Circuit Court
Bel Air, MD 21014

REGARDING: Ex Parte at Common Law Seeking Lawful
Remedy and Injunctive Relief

READ THIS CAREFULLY

Dear Honorable Judge ANGELA EAVES,

I am writing in order to provide you notice of my intention to file an Ex Parte petition at Common Law (not within the statutory or policy jurisdiction), coming in Pro Per ("in one's own proper person"), in Sui Juris ("of his own right"), by way of Special Appearance (not generally), and seeking lawful remedy and injunctive relief. I trust that you will facilitate the filing and hearing of my petition pursuant to Common Law and in accordance with due process protections of the Federal and State Constitutions.

I expect that the Ex Parte hearing will be scheduled for a date and time to accommodate petitioner by Zoom video (rather than by phone) and that there will be no fee for petitioner to appear at the hearing.

NOTICE TO AGENTS IS TO NOTICE
PRINCIPALS, NOTICE TO PRINCIPALS IS
NOTICE TO AGENTS!

I also expect that I will appear before a proper court of record with a court reporter. If necessary, I would be happy to provide a court reporter to ensure accuracy of the court record.

Additionally, I expect that no notice of hearing or summons will be served upon the Defendant for the Ex Parte at Common Law. Please understand that the Defendant was already provided proper notice and reasonable opportunity to respond and yet chose to remain silent which resulted in the Defendant being found in default and estopped in this matter.

Black's Law Dictionary, Fourth Edition: *EX PARTE*. On one side only: by or for one party; done for, in behalf of, or on the application of, one party only. 661 *EX PARTE* A judicial proceeding order, injunction, etc., is said to be *ex parte* when it is taken or granted at the instance and for the benefit of one party only, and without notice to, or contestation by, any person adversely interested. *Janin v. Logan*, 209 Ky. 811, 273 S.W. 531, 532; *Van Alen v. Superior Court in and for Los Angeles County*, 37 Cal.App. 696, 174 P. 672; *Stella v. Mosele*, 299 P. 53, 19 N.E. 2d 433, 435. *Ex parte* means that an application is made by one party to a proceeding in the absence of the other. Thus, an *ex parte* injunction is one granted without the opposite party having had notice of the application. It would not be called "*ex parte*" if he had proper notice of it,

App.49a

and chose not to appear to oppose it.

Thank you for your consideration and prompt attention. Upon receipt, please respond to me directly as soon as possible due to the urgency of this matter. I can be reached at (202) 894-0760 or by email at chemmy1981@gmail.com.

Very truly,

Gary Pfeffer Jr.
In Sui Juris Without Prejudice
/s/ Gary Pfeffer Jr.



SUPREME COURT OF MARYLAND
CASE SUMMARY
CASE NO. COA-PET-0269-2022

In the Matter of Gary Pfeffer, Jr.

§ Location: Supreme Court of Maryland
 § Filed on: 11/01/2022
 § Appellate Court of Maryland 7 - 2022 Term
 § Case Number:
 § Circuit Court Case Number: C-12-CV-22-000087 (Harford
 Co)

CASE INFORMATION

Related Cases

C-12-CV-22-000087 (Petition Filed)
 CSA-REG-0007-2022 (Petition Filed)

Case Type: Petition on Civil Case

Case Flags: Judicial Conflict

DATE

CASE ASSIGNMENT

Current Case Assignment

Case Number	COA-PET-0269-2022
Court	Supreme Court of Maryland
Date Assigned	11/01/2022

PARTY INFORMATION

Petitioner

Pfeffer, Jr., Gary

Pro Se

DATE

EVENTS & ORDERS OF THE COURT

INDEX

11/01/2022	Petition for Writ of Certiorari <i>Petition for Writ of Certiorari filed. F.F. pd.</i>	
11/01/2022	Comment <i>CSA No. 7 - 2022 Term, Opinion: 8/26/22 - Unreported, Mandate: 10/18/22</i>	
11/01/2022	Comment <i>CC Harford County, Eaves, J., C-12-CV-22-000087</i>	
11/02/2022	Petition Receipt <i>Petition docket receipt e-filed and mailed to petitioner.</i>	
11/09/2022	Appendix <i>Appendix to Petition for Writ of Certiorari filed; CC docket entries</i>	
11/17/2022	Conference (10:00 AM) <i>*Judge Eaves Recused</i>	
12/14/2022	Court of Appeals Renamed Supreme Court of MD eff. 12/14/22	
12/19/2022	Petition Denied <i>Petition denied. (Order mailed to petitioner)</i>	
12/19/2022	Denied Comment (Petition denied. *Judge Eaves Recused.)	

DATE

FINANCIAL INFORMATION

SUPREME COURT OF MARYLAND
CASE SUMMARY
CASE NO. COA-PET-0269-2022

Petitioner Pfeffer, Jr., Gary	
Total Charges	61.00
Total Payments and Credits	61.00
Balance Due as of 04/25/2023	0.00

SUPREME COURT OF MARYLAND
CASE SUMMARY
CASE NO. COA-PET-0269-2022

In the Matter of Gary Pfeffer, Jr.

§ Location: Supreme Court of Maryland
 § Filed on: 11/01/2022
 § Appellate Court of Maryland 7 - 2022 Term
 § Case Number:
 § Circuit Court Case Number: C-12-CV-22-000087 (Harford
 Co)

CASE INFORMATION

Related Cases

C-12-CV-22-000087 (Petition Filed)
 CSA-REG-0007-2022 (Petition Filed)

Case Type: Petition on Civil Case

Case Flags: Judicial Conflict

DATE	CASE ASSIGNMENT
	<p>Current Case Assignment</p> <p>Case Number COA-PET-0269-2022 Court Supreme Court of Maryland Date Assigned 11/01/2022</p>

PARTY INFORMATION

Petitioner	Pfeffer, Jr., Gary	Pro Se
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DATE	EVENTS & ORDERS OF THE COURT	INDEX
11/01/2022	 Petition for Writ of Certiorari <i>Petition for Writ of Certiorari filed. F.F. pd.</i>	
11/01/2022	Comment <i>CSA No. 7 - 2022 Term, Opinion: 8/26/22 - Unreported, Mandate: 10/18/22</i>	
11/01/2022	Comment <i>CC Harford County, Eaves, J., C-12-CV-22-000087</i>	
11/02/2022	 Petition Receipt <i>Petition docket receipt e-filed and mailed to petitioner.</i>	
11/09/2022	 Appendix <i>Appendix to Petition for Writ of Certiorari filed; CC docket entries</i>	
11/17/2022	Conference (10:00 AM) <i>*Judge Eaves Recused</i>	
12/14/2022	Court of Appeals Renamed Supreme Court of MD eff. 12/14/22	
12/19/2022	 Petition Denied <i>Petition denied. (Order mailed to petitioner)</i>	
12/19/2022	Denied Comment (Petition denied. *Judge Eaves Recused.)	

DATE	FINANCIAL INFORMATION

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Petitioner Pfeffer, Jr., Gary	
Total Charges	61.00
Total Payments and Credits	61.00
Balance Due as of 04/25/2023	0.00