No. 22-5654

In The
SUPREME COURT OF THE UNITED STATES

ELAINE MICKMAN,
Petitioner

vs.

RICHARD MICKMAN,
Respondent

ON PETITION FOR WRIT OF CERTIORARI

from the April 26, 2022 Order of 3 MM 2022 from The Supreme Court of Pennsylvania

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Elaine Mickman, *pro se*
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(610 6671832)

QUESTIONS PRESENTED

1. Doesn't the state Court violate federal law and the Constitution by depriving *Equal Protection of the Law* when it terminates child support by arbitrarily Age-Discriminating against minor children as ***"2nd Class Siblings"*** ?

2. Isn't the *Governmental Objective* to reduce child welfare-dependency contravened and undermined by the state arbitrarily abusing their power exemplified by reducing and, or, prematurely terminating child support for minors as substitution for a support-payor's personal voluntary expenditures?

3. Doesn't a state Court violate the Constitution and conflict with federal laws by ordering-away a Custodial Parent's fundamental Constitutional Due Process Right to prohibit filing for Child Support?

PARTIES TO THE PROCEEDING

Petitioner Elaine Mickman, the Custodial Parent, is the Plaintiff in the lower Court child support case and the Appellant in the appeal proceedings. Respondent Richard Mickman is the Non-Custodial (absent-tee) Parent and Defendant in the child support case, and the Appellee in appeal proceedings.

* B.J.M and C.T.M. noted in brief are/were the minor younger children.

STATEMENT OF RELATED CASES

Montgomery County Common Pleas August 3, 2020 Order.....No. 2003-06252
Superior Court of PA Appeal Quash March 17, 2021 .....No. 11 EDA 2021
Superior Court of PA Reinstatement Denial April 22, 2021.....No. 11 EDA 2021
Supreme Court of PA Denied to Appeal Nov. 17, 2021 ..... No. 386 MAL 2021
Supreme Court of PA "Petition for Review" of 386 MAL 2021
Denied April 26, 2022.....No. 3 MM 2022

* Superior Court of PA Appeal Quashed Nov. 8, 2019 Order appealed at 686 EDA 2020 on March 18, 2020 as non-final due to outstanding Support Master Hearing which was never conducted per Aug. 3, 2020 Order which gave rise to appeal 11 EDA 2021.
* U.S. Supreme Court granted extension to file Petition of Writ of Certiorari until Sept. 23, 2022.

JURISDICTION

The Supreme Court of the United States has jurisdiction of this matter under 28 U.S.C. § 1254 Courts of appeals; Certiorari; certified questions.

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OPINIONS BELOW

Supreme Court of Pennsylvania No. 3 MM 2022: *Petition for Review* of Supreme Court of Pennsylvania 386 MAL 2021.
"AND NOW, this 26th day of April 2022, the "Petition for Review" is DENIED.

Supreme Court of Pennsylvania No. 386 MAL 2021: *Petition for Allowance of Appeal.*
" AND NOW, this 17th day of November 2021, the Petition for Allowance of Appeal is DENIED.

Superior Court of Pennsylvania No. 11 EDA 2021 April 22, 2021 Order: Appellant's "*Reconsideration To Reinstate *Quashed Appeal"* filed March 31, 2021 is hereby DENIED.

*Appeal 11 EDA 2021: *Rule to Show Cause* represented that the appeal was being quashed on the false and misleading basis that the minor child was emancipated December 2018. In fact, a hearing for Petitioner's December 2018 timely filed *Emancipation Contest* was Never conducted as required by law. After Petitioner's *Show Cause* response refuted the minor was emancipated, the Quash Order states Petitioner was barred from "frivolous filings" regardless that Child Support is NOT frivolous and not res judicata since it is governed by Family Court per 231 Pa. 233.1(e) as Always Modifiable for Change of Circumstance, and the Child Support Guidelines 231 Pa. 1910.19 (and 1910. sequence).

INTRODUCTION

Petitioner's younger children's Support was terminated without the basis of law, rather based on Age-Discrimination against ***"2nd Class Siblings"*** without Equal Protection or Application of law, and arbitrary "knives-out" against minor children.

Petitioner asks no special favor; Petitioner asks only that the Court take their hands off their legal choke-hold on Petitioner to permit, preserve and safe-guard the Constitution and *Equal Protection Clause* and application of law for All.

This Petition for Certiorari "sounds an alarm" for squarely presented important issues of federal law with significant practical consequences. The U.S. Supreme Court is called upon for immediate review of prudent, imperative and significant federal questions and conflicts between governing federal law, Supreme Court precedent, and the state Court decision which goes beyond the facts and parties involved regardless of references to state Court error of law, the Court's misrepresented facts, the and denial of Petitioner's procedural and substantive due process rights.

*Petitioner requests the Court to ignore any character assassinations and besmirchments by Respondent as in prior pattern to deter focus and obfuscate the legal matters before the Court.

STATEMENT OF THE CASE

Petitioner was a full-time homemaker mother of 5 children who fell victim to a conundrum after a near-30 yr. marriage at the time of a divorce order entry. Petitioner received zero divorce settlement and zero alimony from a high-asset marriage, and was left SSI-dependent as a result of DV injury from Respondent. Child support, undercalculated by about half for 8 ½ years pending a divorce trial, was then "effectively" terminated by a judge lacking *Subject Matter Jurisdiction* entering an order crediting the Respondent on the *Title IV-D Computer System for voluntary expenditures for adult children and his personal expenditures which erroneously substituted minor children's support by substantial reduction prior to premature termination. Minor child (B.J.M.) was charged-off to government welfare. Court Records identify minors (C.T.M. & B.J.M.) paid support-payor $249,000. of support via involuntary garnishment of their child support when he never overpaid. A December 2018 Order prematurely terminated the minor child's support and reinstatement was ignored creating a conundrum. Petitioner's timely January 2019 appeal was dismissed due to IFP denial when she is SSI-dependent.

*Violation of ***18 USC 1030*** Trespass of government computer and violation of ***45 CFR 302.38*** *Payments to the family* requires support payments disbursed to the residential caregiver. Child support can be retroactively increased for later discovered fraud *Krebs v Krebs*, but the *Bradley Amendment (1986)* ***42 USC 666(a)(9)(c)*** prohibits States retroactively reducing child support. *Approx.$780,000. Petitioner's Temp. alimony wasn't enforced-double-dip credited Respondent.

- No hearing was conducted as required by law for Petitioner's December 2018 timely-filed *Emancipation Contest* objecting to child support termination.

- No Child Support Master Hearing was conducted for Petitioner's February 2019 "New" Child Support Petition (suggested by DRO Director) for the minor child.

- Petitioner timely filed appeal of a November 8, 2019 Order (686 EDA 2020), which decided various petitions filed by the parties, included a term providing for a January 6, 2020 Support Master Hearing of which was never conducted.

- Case was rotated to another Judge who prematurely conducted a January 7, 2020 "unripe" *Exceptions Hearing* for Respondent's (appeal) without first conducting a **Master Support* Hearing and without a required *Support Master* Order.

- Appeal 686 EDA 2020 was quashed March 18, 2020 as a non-final order since a *Support Master* Hearing was outstanding, yet the January 6, 2020 *Support Master* Hearing never occurred. The Master Hearing rescheduled for August 7, 2020 was dismissed in final Order August 3, 2020. Petitioner refiled appeal at 11 EDA 2021.

.- Appeal 11 EDA 2021 was quashed March 17, 2021 stating Petitioner was barred from "frivolous filings" regardless child support is NOT frivolous. The August 3, 2020 Order erred in law that child support is res judicata.

***23 Pa 1910.19(g) Emancipation Contest for objection to child support termination.**

***** Lower Court case was rotated to another judge Dec. 2019. The new judge violated *Coordinate Jurisdiction* of prior judge's Nov. 8, 2019 Order which provided for Jan. 6, 2020 Master Hearing.

- *Reconsideration* to reinstate appeal 11 EDA 2021 was denied April 22, 2021.

- Petitioner refiled a Child Support Petition after August 3, 2020 dismissal.

- A scheduled Support Conference was canceled by an October 20, 2020 Order in response to Respondent's *Emergency Injunctive Relief* decided without a required hearing by a non-presiding judge lacking *Subject Matter Jurisdiction.*

- Petitioner appealed the October 20, 2020 Order (2207 EDA 2021).

- Petitioner's *Permission to Appeal* (quashed 11 EDA 2021 and 686 EDA 2020) at the Supreme Court of PA (386 MAL 2021) was denied November 17, 2021.

- Petitioner's November 30, 2021 timely-filed *Reconsideration* of 386 MAL 2021 was erroneously stamped 1 day late on December 2, 2021 by Court Prothonotary regardless of 3 USPS evidence proofs submitted per Rule proving timely filing.

- Petitioner's *"Petition for Review"* of 386 MAL 2021 docketed at 3 MM 2022 was denied April 26, 2022 compelling filing this *Petition for Writ of Certiorari.*

- On May 27, 2021, Superior Court of Pennsylvania quashed Petitioner's appeal 2207 EDA 2021 of the October 20, 2020 Order dismissing the child support case and hearing, and the appeal Court "ordered-away" and usurped Petitioner's fundamental Constitutional Right to file for "Always Modifiable" child support, contrary to the Constitution, laws, and Congress's *Governmental Objective.*

REASONS FOR GRANTING CERTIORARI

Beyond the glaring "Upside-down on its head" state Court rulings in this case, Certiorari should be granted to settle conflicts arising between this case and other state and federal cases, but moreover, contravened *Governmental Objectives* for which Congress specifically enacted federal laws which were violated by the state.

The ***Child Support Enforcement Amendments of 1984*** passed by Congress changed the federal government's role from merely enforcing child support to encouraging states to establish *adequate* support orders. The states were mandated by the 1984 amendments to offer child support services to all child support obligees. (codified amended **42 U.S.C. §§ 651-662 (1981) , §§ 651-667 (1984)).**

Under the 14th Amendment, children are "persons" entitled to equal protection in laws that establish ages of majority for child support.

Federal Regulation ***45 CFR § 1357.10 (c)(6)*** *"Children refers to individuals from birth to the age of 21"* (or such age of majority as provided under State law).

The age of majority is 18 years old in most states, except Alabama and Nebraska set the age of majority to 19 years old and Mississippi sets it at 21 years old.

Pa. Cons. Stat. 23 § 4321(2) provides continued child support until 18 years old or until high school graduation, <u>whichever comes later</u>.

Pa. Cons. Stat. 23 § 4321(3) provides extended support for children 18 yrs. or older with conditions preventing from self-supporting as in ***Johnson v Johnson, 153 A.3d 318 (2016)***. Majority age is not the same as emancipation age, *see* ***M.R.A. v A.S. No. 590 2014 (PA SuperFeb. 2015)*** and majority age does not always dictate the end of a parent's child support obligation. States promulgated child support guidelines because of governmental interest in improving fairness. Similarly situated parties should be treated similarly. Children from the same family are all similarly situated when they are supported by the same parent. When a support-paying parent pays different amounts for older children than the younger children, the children are not treated similarly.

Respondent's voluntary expenditures for adult children are entered in the Title IV government computer system which created a false overpayment that reduced the children's support prior to prematurely terminating child support which resulted in child welfare dependency. The Supreme Court struck regulations that discriminated based on gender in child support, therefore discrimination based on birth order should be prohibited to ensure fair support and reduce child welfare-dependency. Minors are deprived to maintain an adequate standard of living when their support is substantially *reduced or *terminated as birth order age-discrimination.

*or in substitution of support-payor's disproportionate expenditures for older siblings.

The younger children should not be mistreated as **"2nd Class Siblings"** by being deprived of the same support or similar life-style as their older siblings, especially when Respondent is the same support-paying parent with same or similar income.

The ***Age Discrimination Act of 1975*** prohibits discrimination on the basis of age and applies to a wider range of individuals affected by federally funded programs of which Title IV-D is a funded program connected with child support. By Respondent giving a disproportionate share of income to older or adult children, the Respondent's younger children were forced to seek welfare relief, compromising the younger children and deeming them **underinclusive**. Ignoring younger children in a family's child support case intentionally produces an incongruous result of inequity among children so similarly situated when they have the same support-paying parent, thereby **age-discriminating against the younger children as "2nd Class Siblings"**.

Discrimination on the basis of birth priority is untenable, yet the system in place to ensure support for minor children was weaponized against them. Chief Justice Rehnquist stated that equal protection requires that all persons similarly situated must be treated equally. ***Trimble v. Gordon, 430 U.S. 762, 780 (1977)*** **(Rehnquist, J., dissenting)**

Chief Justice Rehnquist wrote: ***"The strongest example of similarly situated persons are dependent children of the very same support-paying parent." "The logical conclusion would be to put all children on an equal footing regardless of priority. The support award for children would be determined on the basis of full equality of each child's claim on the father's resources."***

In order to avoid violating the *Equal Protection Clause* and 14th Amendment of the U.S. Constitution, and to spare minor children disparate treatment, state child support guidelines must take into consideration the support-paying parent's responsibility for all children in the family, including younger born children and "Extended" support needed for disabled "Special Needs" children.

As of January 2021, one-fifth of all U.S. children and one third of all U.S. children in poor families, significantly totaling 14.7 million, are dependent on child support. A prior support order must be modifiable so that all the children from the same support-paying parent may be treated equally- Equal Protection for Children.

The ***Equal Protection Clause*** under the **U.S. Constitution 14th Amendment §1** provides: *"Nor shall any State deny to any person within its jurisdiction the equal protection of the laws."* . The U.S. Supreme Court suggested a higher scrutiny level may be required for situations causing "prejudice against discrete and insular

minorities ...which tends to curtail the operation of those political processes ordinarily to be relied upon to protect minorities." This evolved into "*indicia of suspectness*" defined as whether a class is *"saddled with such disabilities, or subjected to such a history of purposeful unequal treatment, or relegated to such a position of political powerlessness as to command extraordinary protection from the majoritarian political process."* ***U.S. v. Carolene Prods., 304 U.S. 144, 153 n.4 (1937).*** That test has remained essentially unchanged. ***San Antonio Indep. School DisL, 411 U.S. at 28.***

A fundamental right must be found either expressly or implicitly within the Constitution. The Court expressly recognized procreation as a constitutionally protected fundamental right, and two distinct rights may be identified with state child support guidelines: the support-paying parents' right to procreate and the right of dependent children to receive support.

The Supreme Court held in ***Trimble v. Gordon*** that a state may not *"attempt to influence the actions of men and women by imposing sanctions on the children."* The state Court brazenly imposed sanctions on the minor children by depriving them adequate, equitable, and fair support via garnishing their child support as substitution for Respondent's voluntary expenditures for adult children siblings

and then prematurely terminated child support for the unemancipated youngest sibling, an Autistic and "Special Ed/Needs" school student. Respondent's "credit" was not for overpaying support, rather a "free-pass" to defeat support and erase arrears. *"If discrimination on the basis of illegitimacy is impermissible,* ***discrimination on the basis of priority of birth seems equally untenable."*** ***Krause, supra n. 34, at 357 (footnote omitted).*** In ***Orr v Orr, 440 U.S. 268(1979)*** "*We have also recognized "reduction of the disparity in economic condition between men and women caused by the long history of discrimination against women..an important governmental objective,"* ***Califano v Webster, supra at 317.***

Relevant facts were overlooked or misunderstood in a pragmatic and prudent way which presents strong grounds substantiating the erosion of the child support responsibility intended by Congress. Child support responsibility can erroneously be reversed onto the Custodial Parent or even the minor children via child support garnishment or termination. State Court decisions are resting on misrepresented facts and laws that are being abandoned rather than fostered. The child support dysfunction goes beyond inequity. The state is applying ***"Separate but Equal"*** in child support cases by financially segregating same-family children and depriving *Equal Protection of the Law* in violation of the 14th Amendment.

The ***Equal but Separate*** legal doctrine was found unconstitutional and harmful regardless that facilities provided were equal to each race in government services. C.T.M and B.J.M. were subject to inherently unequal financial segregation and deprivation under *Equal Protection of the Law* by the government child support services, contrary to the governmental objective by Congress to ensure child support to reduce child welfare-dependency. In ***Bolling v Sharpe, 347 U.S. 497***, Chief Justice Warren wrote: ... *"we hold that plaintiffs and others similarly situated for whom actions have been brought are, by reason of the segregation complained of, deprived of the equal protection of the laws guaranteed by 14th Amendment."* ***Brown v. Board of Ed. (1954)*** ruled "*Separate but Equal*" to be unconstitutional.

An alarm should be sounding to classify child support "**2nd Class Siblings**" as discriminatory and a contravention to achieving "governmental objectives" in reducing child welfare-dependency and economic disparity when this instant case illustrates decreased government objectives and increased child-dependent welfare. This instant case exemplifies contradiction of "governmental objectives", which left a medically and permanently disabled SSI-dependent Custodial parent with no other option than to file for government public assistance for a minor child whose wealthy non-custodial parent has excessive disposable *income for child support.

*Respondent's disclosed income in discovery forensic records. Concealed income in IRS record.

The minor children shouldn't have been deprived support under the Title IV program as "2nd Class Siblings" due to their birth order of being the younger children. The Respondent's attorney argued to PA Superior Court of Appeals in 2012 that he *"shouldn't have to pay child support for more than 10 years."*, which begs to question the impact of child support on a newborn baby. Since the Reversal of *Roe v Wade,* legislatures suggested in 2022 a child support law which could begin at conception, but at what age would support terminate? Unsettled questions impacting child support will arise following reversal of ***Roe v Wade.***

Child support nationwide continues until at least 18 years old, yet the minor children's support in this instant case "effectively" terminated when they were 10 and 13 years old. To clarify, a paltry "loan" was funneled through the Title IV-D Computer System under the guise of child support July 2011 until December 2018 at which time child support was terminated for Respondent's youngest child who was an unemancipated minor in public school. Proof was only in hindsight since support modification could have rectified the matter. Respondent's January 2019 Petition sought repayment for 7 ½ years of support for the minors due to his voluntary expenditure "credit" for adult children, a Title IV-D *Computer Trespass at the monumental exploitive hardship of his younger "2nd Class Sibling" children.

18 USC 1030 (a)(2)(3)(4) Trespass of government computer-entering non-minor child support.

Ordering-away a fundamental Constitutional Right for due process to address legal grievance in Court reduces and "tiers" an individual's "personhood". Constitutional Rights cannot be suspended, even during wartime. *"If a law has no other purpose...than to chill the assertion of constitutional rights by penalizing those who choose to exercise them, then it is patently unconstitutional."* ***U.S. v. Jackson, 390 U.S. 570, 581 (1968).***

Petitioner was penalized by being barred from Court for exercising a fundamental Constitutional Right to seek "Always Modifiable" child support ***231 Pa. 1910.19*** which is not subject to res judicata per ***231 Pa. 233.1(e)***.

The appeal Court stated in their March 17, 2021 quash of appeal 11 EDA 2021 that Petitioner was "cautioned against any 'frivolous filings'", but regardless That child support is not frivolous, the appeals Court ordered May 27, 2021 in a quash of appeal 2207 EDA 2021 that Petitioner was barred from ever filing for child support.

Congress did NOT find child support frivolous, to the contrary, Congress mandated the 1984 Amendments to offer child support services to all child support obligees (codified amended **42 U.S.C. §§ 651-662 (1981) , §§ 651-667 (1984)**. Unsettled conflict exists between the state Court and federal laws enacted by Congress.

The combination of federal laws enacted by federal legislatures and the Title IV system devised to operate and enforce child support substantiates that children's lives matter and that Child Support is a prudent, meaningful and important priority, and is certainly NOT frivolous. Petitioner's 14th Amendment right pursuing a meritorious matter was manifestly trampled contrary to PA Constitution Articles:

V 10(c) *"...neither abridge..nor modify substantive rights of any litigant.."*

V 9 Right of appeal. *"There shall be a right of appeal in all cases..."*

I § 1. Inherent rights of mankind."*All...have indefeasible rights"*

The state Court violated ***210 Pa. 63.1*** *"No substantive or procedural rights are created, nor are any such rights diminished."* as well as legislated law ***42 Pa. 4902 (1)*** *"It is of paramount importance...that all individuals who seek lawful redress of their grievances have equal access to our system of justice."*

The U.S Supreme Court should reverse the state Court's unequivocal abuse and superseding of its authority which contravenes federal law when:

a) Child Support is "Always Modifiable" for *Change of Circumstance* which could not be determined due to the cancellation of the Child Support Master Hearing and case dismissal. *Res judicata* does NOT apply per 231 Pa. 233.1(e) and 231 1910.19.

b) The U.S. Supreme Court "birthmark stain" with the 1857 ***Dred Scott*** case depriving Court access due to *Scott's* identification was never overturned or reversed. Court barriers were supposed to have been removed by the 13th and 14th Amendments. Petitioner's 14th Amendment right was usurped while properly pursuing child support which is a governmental objective. The state Court arbitrarily "resurrected" and "rebranded" a Court barrier that denies due process and access to justice, therefore it is imperative for the U.S. Supreme Court to prohibit Courts nationwide from ordering-away rights and denying Court access.

CONCLUSION

It is imperative for the U.S. Supreme Court to prohibit "*2nd Class Sibling*" *Separate but Equal* Age-Discrimination by state government services and that *Equal Protection of Law* be applied for child support as well as prohibiting Courts from barring individuals the fundamental Constitutional Rights to due process, especially to file for "always modifiable" child support.

Wherefore, conflicts and unsettled questions of federal law, with more to come following the reversal of *Roe*, Petitioner prays *Writ of Certiorari* will be Granted.

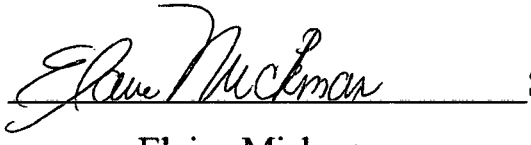
Most Respectfully Submitted,

September 19, 2022

Elaine Mickman

IN THE SUPREME COURT OF THE UNITED STATES

This hereby verifies the forgoing in the Petition for Writ of Certiorari to be true and correct to the best of my knowledge.



September 19, 2022

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