

22-5959

No. _____

ORIGINAL

Supreme Court, U.S.
FILED

OCT 17 2022

OFFICE OF THE CLERK

IN THE

SUPREME COURT OF THE UNITED STATES

William A White

— PETITIONER

(Your Name)

vs.

United States Of America, etal — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

United States Court Of Appeals For The Seventh Circuit

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

William A White #13888-064

(Your Name)

Federal Correctional Institution - Cumberland

PO Box 1000

(Address)

Cumberland, MD 21501

(City, State, Zip Code)

n/a

(Phone Number)

RECEIVED

OCT 26 2022

OFFICE OF THE CLERK
SUPREME COURT, U.S.

QUESTION(S) PRESENTED

Did the Seventh Circuit err in upholding two orders issued by United States District Judge J. Phil Gilbert of the United States District Court for the Southern District of Illinois barring me from filing any document, regardless of merit, in the Southern District of Illinois for two years and sanctioning me with a \$1000 fine where:

- a) the order barring me from filing meritorious documents in the District Court is recognized by every other Circuit to constitute an un-Constitutional denial of the right of access to the courts;
- b) the Seventh Circuit relied on false mis-statements of the record to justify upholding the order entered in White v. Collis SD Ill Case No: 20-cv-01117;
- c) there was no proper factual basis for the \$1000 fine;
- d) the Seventh Circuit's finding that, when I tendered a commissary trust account statement with my in forma pauperis application in Whitew, United States SD Ill Case No: 17-cv-683, but, did not copy the commissary trust information onto the accompanying affidavit, I filed an "untrue" claim of poverty, is contrary to its own and other Circuit's case law and is otherwise a false mis-statement of the record.

LIST OF PARTIES

[] All parties appear in the caption of the case on the cover page.

☒ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

William A White

United States of America

Michael J Collis

Kathy Hill

Bill True

D. Christensen

RELATED CASES

White v. United States SD Ill Case No: 16-cv-968

White v. United States MD Pa Case No: 20-cv-291

White v. United States WD Pa Case No: 20-cv-028

White v. United States 10th Cir App No: 21-6007

White v. Hill SD Ill Case No: 22-cv-0133

Table of Authorities

<u>Cases</u>	<u>Pages</u>
* <u>Adkins v. E. I. DuPont de Nemours & Co</u> 335 US 331 (1948)	21
* <u>Adkins v. Whole Foods Mkt Grp Inc</u> 795 Fed Appx 217 (4 th Cir 2020)	15
* <u>Amadeo v. Zant</u> 486 US 214 (1988)	18
* <u>In Re: Anderson</u> 128 L Ed 2d 332 (1994) (per curiam)	12
* <u>Anderson v. Bessemer City</u> 470 US 564 (1984)	17-18
* <u>Andrews v. Heaton</u> 483 F3d 1070 (10 th Cir 2007)	15
* <u>Balaudjger v. Scott</u> 160 F3d 1066 (5 th Cir 1998)	14
* <u>Bates v. Dickens</u> 618 Fed Appx 183 (4 th Cir 2006)	16
* <u>Baum v. Blue Moon Ventures, LLC</u> 513 F3d 181 (5 th Cir 2008)	13
* <u>Bill Johnson's Restaurants v. NLRB</u> 461 US 731 (1983)	12
* <u>Blake v. McClung</u> 172 US 239 (1898)	12
* <u>Boddie v. Connecticut</u> 401 US 371 (1971)	12
* <u>California Motor Transport Co. v. Trucking Unlimited</u> 404 US 508 (1972)	12
* <u>Camp v. Oliver</u> 798 F2d 434 (11 th Cir 1986)	22
* <u>Carroll v. Abide (In Re: Carroll)</u> 850 F3d 811 (5 th Cir 2017)	14
* <u>Castro v. United States</u> 775 F3d 399 (1 st Cir 1985)	14
* <u>Censkev. United States</u> 2017 US Dist LEXIS 150420 (SD Ind 2017)	6
* <u>Censkev. United States</u> 947 F3d 488 (7 th Cir 2020)	5
* <u>Chambers v. Baltimore & Ohio RR Co</u> 207 US 142 (1907)	12
* <u>Chapman v. Exec Comm</u> 324 Fed Appx 500 (7 th Cir 2009)	13-14
* <u>Childress v. Kerr</u> 803 Fed Appx 949 (7 th Cir 2020)	20-21
* <u>Christopher v. Harbury</u> 536 US 403 (2002)	12
* <u>Coleman v. Calumet City</u> 754 Fed Appx 468 (7 th Cir 2019)	21
* <u>Corfield v. Coryell</u> 6 F Cas 546 (CC ED Pa 1825)	12
* <u>Cromer v. Kraft Foods N Am Inc</u> 390 F3d 812 (4 th Cir 2004)	14-15
* <u>Davis v. Green</u> 2009 US Dist LEXIS 10471 (SD Ind 2009)	21

Table of Authorities

<u>Cases</u>	<u>Pages</u>
* <u>DeLong v. Hennessey</u> 912 F2d 1144 (9 th Cir 1990)	15
* <u>Dix v. Edelman Fin Servs LLC</u> 978 F3d 507 (7 th Cir 2020)	14
* <u>Donelson v. Tamer</u> 768 Fed Appx 724 (7 th Cir 2019)	21
* <u>Doyle v. Babine</u> 2021 US Dist LEXIS 121025 (D Me 2021)	21
* <u>Elbery v. Louison</u> 1999 US App LEXIS 32883 (1 st Cir 1999)	15
* <u>Floyd v. Lee</u> 85 F Supp 3d 482 (D DC 2015)	22
* <u>Haywood v. Wexford Health Services</u> 2021 US App LEXIS 30707 (7 th Cir 2021)	21
* <u>In Re: Head</u> 174 Fed Appx 167 (4 th Cir 2006)	16
* <u>Hill v. Carpenter</u> 323 Fed Appx 167 (3 rd Cir 2009)	16
* <u>Hill v. Umpstead</u> 639 Fed Appx 60 (3 rd Cir 2018)	15
* <u>Himmel v. New York</u> 2000 US App LEXIS 4486 (2 nd Cir 2000)	15
* <u>Hodges v. Ghosh</u> 592 Fed Appx 522 (7 th Cir 2015)	20
* <u>Icicle Seafoods, Inc. v. Worthington</u> 475 US 709 (1986)	18
* <u>Johnson v. Manion</u> 1999 US App LEXIS 3080 (7 th Cir 1999)	12
* <u>Kraft v. Hatch</u> 853 Fed Appx 261 (10 th Cir 2021)	15
* <u>Lee v. McDonald's Corp.</u> 231 F3d 456 (8 th Cir 2000)	21
* <u>In Re: Martin-Trigona</u> 9 F3d 226 (2 nd Cir 1993) <u>cert denied</u> 474 US 1075 (1993)	14
* <u>Matthews v. Gaither</u> 402 F2d 871 (11 th Cir 1990)	22
* <u>McClafferty v. Portage City</u> 2021 US App LEXIS 35894 (6 th Cir 2021)	22
* <u>McDonald v. Chicago</u> 561 US 742 (2010)	12
* <u>McPherson v. DA of Chester</u> 621 Fed Appx 704 (3 rd Cir 2015)	15
* <u>Miller v. Donald</u> 541 F3d 1091 (11 th Cir 2018)	15
* <u>Molski v. Evergreen Dynasty Corp</u> 500 F3d 1049 (9 th Cir 2007)	15-16
* <u>Moy v. United States</u> 906 F2d 467 (9 th Cir 1990)	15

Table Of Authorities

<u>Cases</u>	<u>Pages</u>
* <u>Murray v. Gurratano</u> 492 US1 (1989) (plurality)	12
* <u>Nottingham v. Warden, Bill Clements Unit</u> 837 F3d 438 (5 th Cir 2016) (Haynes, dissent)	22
* <u>In Re: Oliver</u> 682 F2d 443 (3 rd Cir 1982)	14
* <u>Ortman v. Thomas</u> 99 F3d 807 (6 th Cir 1990)	14, 16
* <u>In Re: Packer Ave Assocs</u> 884 F2d 743 (3 rd Cir 1989)	14-16
* <u>Pavilonis v. King</u> 626 F2d 1075 (1 st Cir 1980)	14
* <u>Pennsylvania v. Finley</u> 481 US551 (1987)	12
* <u>Perry v. Milwaukee Pub Schs</u> 12 Fed Appx 406 (7 th Cir 2001)	13
* <u>In Re: Painter</u> 345 Fed Appx 204 (8 th Cir 2009)	15-16
* <u>In Re: Powell</u> 851 F2d 427 (DC Cir 1988)	15
* <u>Procup v. Strickland</u> 792 F2d 1069 (11 th Cir 1986) (en banc)	15-16
* <u>Pullen-Walker v. Exec Comm of the US Dist Ct</u> 482 Fed Appx 185 (7 th Cir 2012)	14
* <u>Ringgold-Lockhart v. City of Los Angeles</u> 761 F3d 1057 (9 th Cir 2013)	15, 18
* <u>Robertson v. French</u> 949 F3d 347 (7 th Cir 2020)	20
* <u>Ross v. Fagon</u> 635 Fed Appx 824 (11 th Cir 2016)	22
* <u>Ruiz v. Bautista</u> 801 Fed Appx 439 (7 th Cir 2020)	20
* <u>Safir v. United States Lines Inc</u> 792 F2d 19 (2 nd Cir 1986)	14-15
* <u>Sampson v. Yellow Cab Co</u> 2000 US App LEXIS 8725 (7 th Cir 2000)	13
* <u>Sassower v. Mead Data Central Inc</u> 126 LEd 2d 6 (1993) (per curiam)	12
* <u>Sellers v. United States</u> 881 F2d 1061 (11 th Cir 1989) (per curiam)	22
* <u>Sieverding v. Cobb Bar Ass'n</u> 169 F3d 1340 (10 th Cir 2006)	15
* <u>Slaughterhouse Cases</u> 21 LEd 394 (1873)	12
* <u>Support Systems International Inc v. Mack</u> 45 F3d 185 (7 th Cir 1995)	12-14
* <u>Thomas v. Fulton</u> 260 Fed Appx 594 (4 th Cir 2008)	15

Table of Authorities

<u>Cases</u>	<u>Pages</u>
* <u>Trope v. Fid Nat'l Title Ins Co</u> 289 F3d 929 (6 th Cir 2002)	14
* <u>In Re: Tyler</u> 839 F2d 1290 (8 th Cir 1988)	14
* <u>United States ex rel Hancock v. Reagan</u> 2000 US App LEXIS 36528 (7 th Cir 2000)	13
* <u>United States ex rel Verdone v. Circuit Court</u> 73 F3d 664 (7 th Cir 1995)	14
* <u>United States v. Turner</u> ED NY Case No: 09-650, 720 F3d 411 (2 nd Cir 2013)	8
* <u>United States v. United States Gypsum Co</u> 33 US 304 (1948)	18
* <u>United States v. White</u> WD Va Case No: 08-cr-054	7
* <u>Urban v. United Nations</u> 768 F2d 1497 (DC Cir 1985)	15
* <u>Varn v. Comm'r of the NY Dept of Corr</u> 496 F Appx 113 (2 nd Cir 2012)	21
* <u>Walters v. National Assn of Radiation Survivors</u> 473 US 305 (1985)	12
* <u>White v. Exec Ofc of USA Hys</u> 2021 US Dist LEXIS 243838 (SD Ill 2021)	11
* <u>White v. United States</u> SD Ill Case No: 16-cv-948	5
* <u>White v. Fields</u> 2022 US Dist LEXIS 105333 (SD Ill 2022)	11
* <u>White v. United States</u> 2017 US Dist LEXIS 130698 (SD Ill 2017)	5
* <u>White v. United States</u> 2017 US Dist LEXIS 127140 (SD Ill 2017)	5-6
* <u>White v. United States</u> 2019 US Dist LEXIS 123491 (SD Ill 2019)	6
* <u>White v. United States</u> 2020 US Dist LEXIS 241480 (SD Ill 2020)	7
* <u>White v. United States</u> 2022 US App LEXIS 16691 (7 th Cir 2022)	10
* <u>Wolff v. McDonnell</u> 418 US 534 (1974)	12
* <u>Wood v. Santa Barbara Chamber of Commerce Inc</u> 705 F2d 1515 (9 th Cir 1993)	14-16

Table of Authorities

Statutes

	<u>Pages</u>
* 5 USC § 501, et seq	4
* 28 USC § 1254(1)	4
* 28 USC § 1331	4
* 28 USC § 1346	4
* 28 USC § 1291	4
* 28 USC § 1292(a)(1)	4
* 28 USC § 1915(e)(2)(A)	21
* 28 USC § 2671, et seq	5

Rules

* Fed. R. Civ. P. 4(a)(1)(B)(i)	4
* Fed. R. Civ. P. 5.2	9

Constitutional Articles And Amendments

* US Const Art IV § 2(c).1	12
* US Const Amend I	12
* US Const Amend V	12
* US Const Amend XIV	12

TABLE OF CONTENTS

OPINIONS BELOW	1
JURISDICTION.....	2
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	3
STATEMENT OF THE CASE	4
REASONS FOR GRANTING THE WRIT	12
CONCLUSION.....	24

INDEX TO APPENDICES

APPENDIX A - Text of the Constitutional and Statutory Provisions	26
APPENDIX B - District Court Order in <u>White v. Collis</u>	34
APPENDIX C - District Court Order in <u>White v. United States</u>	39
APPENDIX D - Seventh Circuit Order	49
APPENDIX E - Seventh Circuit Sanctions Order	55
APPENDIX F - Seventh Circuit Order Denying Rehearing	57

IN THE
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

☒ For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix D-F to the petition and is

☒ reported at 2022 US App LEXIS 16691; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

The opinion of the United States district court appears at Appendix B-C to the petition and is

2021 US Dist LEXIS 183941
☒ reported at 2021 US Dist LEXIS 183954; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

☐ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix _____ to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

JURISDICTION

☒ For cases from federal courts:

The date on which the United States Court of Appeals decided my case was June 16, 2022.

☐ No petition for rehearing was timely filed in my case.

☒ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: July 29, 2022, and a copy of the order denying rehearing appears at Appendix F.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☐ For cases from state courts:

The date on which the highest state court decided my case was _____.
A copy of that decision appears at Appendix _____.

☐ A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- * US Const Art IV § 2 C1.1
- * US Const Amend I
- * US Const Amend V
- * US Const Amend XIV
- * 28 USC § 1915

STATEMENT OF THE CASE

Jurisdiction

- 1) This case involves two consolidated appeals: one, from White v. United States SD Ill Case No: 17-cv-683 ("United States") 7th Cir App No: 21-2835; and, one from White v. Collis SD Ill Case No: 20-cv-01117 ("Collis") 7th Cir App No: 21-2881.
- 2) The District Court had jurisdiction over White v. United States pursuant to 28 USC § 1331 and § 1346. Its final order of judgment dismissing the action as a sanction was entered September 27, 2021. United States Doc 116-117. Appeal was timely noted October 5, 2021. United States Doc 120. The Seventh Circuit had jurisdiction pursuant to 28 USC § 1291 and Fed. R. Civ. P. 4(a)(1)(B)(i). Its final order denying the Motions for Panel Rehearing and Rehearing En Banc was entered July 29, 2022. This Court's jurisdiction is invoked under 28 USC § 1254(1).
- 3) The District Court had jurisdiction over Collis pursuant to 28 USC § 1331 and 5 USC § 501, et seq. Its interlocutory sanctions order, which effectively terminated the proceedings, was entered September 27, 2021. Collis Doc 24. Appeal was timely noted October 6, 2021. Collis Doc 31. The Seventh Circuit had jurisdiction pursuant to 28 USC § 1291(a) and Fed. R. Civ. P. 4(a)(1)(B)(i). Its final order denying the Motions for Panel Rehearing and Rehearing En Banc was entered July 29, 2022. This Court's jurisdiction is invoked under 28 USC § 1254(1).

Factual And Procedural Background

White v. United States SD III Case No 17-cv-683

- 4) White v. United States involves 54 claims brought against the Bureau of Prisons ("BOP") and United States Marshalls Service ("USMS") pursuant to the Federal Tort Claims Act ("FTCA"), 28 USC §1346, §2671, et seq, and four administrative claims: a claim presented to the BOP about February 12, 2016, United States Doc 49 p. 2 para 4; a claim presented to the BOP about November 26, 2016, United States Doc 49 p. 2 para 5; a claim presented to the BOP in July 2017, United States Doc 49 p. 2 para 6; and, a claim which I first attempted to present to the USMS on March 7, 2016, and, which I successfully presented December 14, 2016 (though counsel mispled this as December 29, 2016). United States Doc 49 p. 3 para 7.
- 5) I originally attempted to bring my claims for the conduct of the BOP and USMS through June 12, 2013, as White v. United States SD III Case No 16-cv-948. The District Court, contra the Seventh Circuit's later ruling in Censky v. United States 947 F3d 488 (7th Cir 2020), erroneously dismissed this action as un-exhausted as to the USMS. White v. United States SD III Case No 16-cv-948 Doc 15, 21. It dismissed as to the BOP as time barred.
- 6) I filed the original complaint in the instant White v. United States June 30, 2017. United States Doc 1. I asked the District Court to consider this a re-instatement of White v. United States SD III Case No 16-cv-948, United States Doc 2-3, but, was ordered to file an IFP application. White v. United States 2017 US Dist LEXIS 130698 (SD III 2017). I did so, United States Doc 9, and, was ordered to supplement it with seven months commissary statements. White

v. United States 2017 US Dist LEXIS 127140 (SD Ill 2017). I did so. United States Doc 17. And, the District Court admits, United States Doc 116 p. 6 citing United States Doc 9, 17, that I disclosed \$3275.00 in income in the six months prior to filing, and, that United States Doc 17 disclosed "periodic payments from Western Union in the amount of \$300.00". The filing fee was paid in full by November 2017.

- 7) I sought and received recruitment of counsel. United States Doc 30. The order specifically states that "Plaintiff shall not personally file anything in the case." United States Doc 30 p. 3.
- 8) C Blane Osman, son of a personal friend of the District Judge, was recruited as counsel, and we met and agreed that I would raise at least \$25,000 to pay costs of the litigation, while he would not charge attorneys fees. United States Doc 113 (this is contained in a later docket entry unsealing it). In 2019, I paid Osman \$14,000, and, in 2020, I attempted to pay him \$15,000 more - though he closed his office due to COVID-19 and never conducted the agreed upon discovery. United States Doc 113. I also told Osman to report the fundraising, but, he opined that it was not reportable since I'd paid the filing fee in full - though he also assured me that he'd look into it and take care of it. United States Doc 113. We're here because Osman didn't do it.
- 9) Osman filed the operative Second Amended Complaint, United States Doc 49, on April 2, 2018. The United States moved to dismiss for a variety of reasons, including failure to exhaust and the statute of limitations, on June 15, 2018. United States Doc 57. On July 24, 2019, the District Court entered an Order bifurcating the claims as to the USMS and BOP and dismissing the USMS claims pursuant to the reasoning of Censke v. United States 2017 US Dist LEXIS 150420 (SD Ind 2017), while dismissing certain claims against the BOP pursuant to the statute of limitations. United States Doc 72; White v. United States 2019 US Dist LEXIS 123491 (SD Ill 2019).

10) On October 16, 2020, the United States moved to dismiss the instant White v. United States on the grounds that I'd filed a false IFP application by not reporting on the IFP affidavit the information I'd disclosed in my trust fund statement and by raising money after the case was filed to pay costs. In United States v. White WD Va Case No: 08-cr-054 Doc 411 et al, I testified that I had a friend, Paul Angel, raise about \$17,500 between January 2015 and December 2017 which was used to repay my mother \$17,500 in legal expenses she incurred between December 2014 and July 2016 on my behalf. There was no evidence that any of that money was raised or received in the six or twelve month periods before the IFP application was filed or that I have any accounting of this money.

11) Without any evidence or even making an inquiry with Osman, the District Court "factually found" that I'd filed a false IFP application and defrauded Osman by not informing him of the money being raised, ignoring the only evidence, my testimony to the contrary. White v. United States 2020 US Dist LEXIS 241480 (SD Ill 2020); United States Doc 102. But, on January 8, 2021, Osman appeared and told the Court I owed him nothing. United States Doc 108. I responded to Judge Gilbert's order by telling him off and calling him a liar. United States Doc 105, 110. However, I also paid the \$50 administrative fee that had been waived, offered to pay any other fees the Court felt was due, and ultimately apologized for my outburst in a pleading the District Court struck. United States Doc 110

White v. Collis SD Ill Case No: 20-cv-01117

12) I filed Collis October 16, 2020. Collis Doc 1. Collis raises a number of Constitutional and Administrative Procedures Act ("APA") claims regarding the BOP's retaliation against me for refusing to dismiss litigation against it, including the instant White v. United States, refusing to "accept responsibility" for my crimes of conviction,

which I didn't commit, and most importantly, refusing to cooperate and testify as directed in the prosecutions of Matthew Hale, Craig Cobb and others for the 2005 murders of Michael Lefkowitz and Dana Humphrey, the husband and mother of United States District Judge Joan Lefkowitz and personal friends of much of the Seventh Circuit. see their testimony in United States v. Turner ED NY case No. 09-0650, 720 F3d 411 (2nd Cir 2013)

(13) The District Court (in the person of the same judge as White v. United States)

screened Collis March 5, 2021. Five months after it was filed. Collis Doc 6. This Order, like many of Judge Gilbert's orders, is verbally abusive towards me and repeatedly mis-states the record in a manner that suggests that Gilbert is either making deliberately false statements or is unable to understand the pleadings. Days later, Gilbert then entered Collis Doc 7, the predecessor to the instant sanctions order.

(14) When I filed Collis, I had intended to amend the suit to include claims that had not been administratively exhausted when I filed. As such, I pled additional related facts that would be the basis of those claims; this would save me the trouble of re-numbering the paragraphs with whiteout and a typewriter when I amended. Collis Doc 1 p. 31-34 para 33-34. As part of this, I attached a true and correct copy - not a falsified, doctored or altered document - of a document I'd been barred from mailing to the American Free Press as I'd tried to mail it. Collis Doc 1 Exh B(c)(iii). This document is an FBI document, received redacted in FOIA, for which I'd completed redacted in form action, including the block number and street name where the Lefkowitz murders occurred.

(15) In Collis Doc 7, the District Court begins by knowingly and falsely declaring that Collis Doc 1 Exh B(c)(iii) has been "altered, doctored or falsified," also incorrectly referring to it as "several" documents. The Court followed this by falsely stating that Collis names "undercover" federal agents, falsely stating that Fed. R. Civ. P. 5.2

required the redaction of the Lefkowitz address, arbitrarily declared the complaint to be a "security threat", and entered an Order barring me from "filing any more documents containing the sensitive information outlined in Rule 5.2 as well as the home addresses, phone numbers and other personal identifying information of public servants." Collis Doc 7. The Court then barred me from "filing any documents obtained pursuant to a request under the Freedom of Information Act and then altered, doctored or otherwise falsified." Collis Doc 7. And, the Court ordered that all of my future filings in the Southern District of Illinois for the next year would be filed under seal, preventing the public from seeing that the Court was making false statements about my pleadings. Collis Doc 7.

16) I subsequently filed Collis Doc 11 under seal, in which I noted the falsity of the District Court's allegations and demonstrated that the Lefkowitz address had come from the Chicago Tribune newspaper, where it had been previously distributed to millions of people without creating a "security threat." I also averred that I'd redacted about 40 other addresses from the pleadings and simply missed the address in question. Collis Doc 11. And, I pled that I'd been sanctioned without notice, as Fed. R. Civ. P. 5.2 gives no notice that one must redact addresses from pleadings. Collis Doc 11. I also filed an appropriate motion to unseal with proposed redactions. Collis Doc 11. (Collis Doc 11 is also an appendix to my Opening Brief in the Seventh Circuit.)

Sanctions Orders

17) On September 27, 2021, Gilbert entered the instant sanctions orders, United States Doc 116 and Collis Doc 24. These orders both read:

"William White is SANCTIONED with a filing restriction in this District that takes effect immediately and continues for the next two years. During this

time period, White is prohibited from filing any new civil actions in this Court, and, the Clerk of the Court is DIRECTED to RETURN UNFILED all civil pleadings he submits for filing in a pending or new action... Moreover, all habeas corpus filings will be summarily dismissed thirty days after filing, unless otherwise ordered by this Court.

United States Doc 116 p 14-15; Collis Doc 24 p. 6

White v. United States was also dismissed with prejudice as a sanction.

18) I timely appealed October 5 and 6, 2021. 7th Cir Doc 1. The appeals were consolidated November 16, 2021. 7th Cir Doc 9. A stay of the District Court's order was granted in part soon after. 7th Cir Doc 24. The defendants physically vandalized my pleadings in an attempt to prevent me from being heard on appeal. 7th Cir Doc 19. Ultimately, the Seventh Circuit upheld the total ban on access to the Court, stating falsely that I:

- a) "lied to the district court" "about my indigency" because I had "failed to disclose" four categories of "income and assets";
- b) "disobeyed court orders";
- c) only appealed the issue "that the judge lacked authority to impose the bar";
- d) "filed unsealed" Collis Doc 11;
- e) "boasted that donors would pay any fine; and,
- f) that, during my appeal, I "baselessly accuse[d] the judge of 'fixing' cases, 'lying' and 'dementia'".

None of this ever happened. White v. United States 2022 US App LEXIS 16691 (7th Cir 2022).

19) Ultimately, the Seventh Circuit fined me \$1000. 7th Cir Doc 47. My motion for Panel Rehearing and for Rehearing En Banc were denied August 3, 2022. 7th Cir Doc 49.

21.) As a result of the District Court's sanctions orders, I've had several legal actions dismissed for lack of prosecution. see, eg. White v. Executive Office of United States Attorneys 2021 US Dist LEXIS 243838 (7th Cir 2021); White v. Fields 2022 US Dist LEXIS 105333 (SD Ill 2022)

Social Consequences

22.) The District Court's outlawing of me did not resolve the problems between myself and the BOP, so, we resolved them with violence, outside of the law. I became so violent, the BOP couldn't "manage" me. So, after a decade of reasoning and legal action failed, violence persuaded the BOP to begin treating my PTSD in December 2021. It also removed the Special Administrative Measures ("SAMs") it put on me, unblocked my contacts, and moved me out of the Seventh Circuit. Ultimately, the Department of Justice failed to win my cooperation, and, the Lef Kow killers got away with their murders. So, I got everything the Court refused to give me, the DOJ got none of the things the court wanted, and, both rule of law and respect for the law suffered.

REASONS FOR GRANTING THE PETITION

I. The District Court Lacked The Inherent Power To Bar Me From Filing Non-Frivolous Pleadings Before It

23) Since the earliest days of the Republic, a "right of access to the courts" which is "fundamental" and which "belongs, of right, to the citizens of all free governments" has been recognized by this Court. McDonald v. Chicago 561 US 742 (2010) citing Corfield v. Coryell 6 F Cas 546 (CC ED Pa 1825). Decisions of this court have grounded the right of access to the courts in the Article IV Privileges and Immunities Clause, Chambers v. Baltimore & Ohio RR Co 207 US 142 (1907); Blake v. McClung 172 US 239 (1898); Slaughter House Cases 21 L Ed 394 (1873); the First Amendment Petition Clause, Bill Johnson's Restaurants v. NLRB 461 US 731 (1983); California Motor Transport Co v. Trucking Unlimited 404 US 508 (1972); the Fifth Amendment Due Process Clause, Murray v. Gissarano 492 US 1 (1989) (plurality); Walters v. National Assn of Radiation Survivors 473 US 305 (1985); and, the Fourteenth Amendment Equal Protection, Pennsylvania v. Finley 481 US 551 (1987), and Due Process Clauses, Wolff v. McDonnell 418 US 539 (1974); Boddie v. Connecticut 401 US 371 (1971); Christopher v. Harbury 536 US 403 (2002). This Court has never endorsed an infringement of this right greater than a bar on proceeding IFP. In Re: Anderson 128 L Ed 2d 332 (1994) (per curiam); Sassower v. Mead Data Central Inc 126 L Ed 2d 6 (1993) (per curiam).

24) In contrast to this Court and every other Circuit, the Seventh Circuit has arrogated to itself the un-Constitutional power of barring disfavored litigants from pursuing any action, including potentially meritorious actions, in the federal courts. These filing bans generally trace their origins to Support Systems International Inc v. Mack 45 F3d 185 (7th Cir 1995). Before Support Systems, the

Seventh Circuit did no more than other Circuits in restricting litigants who make frivolous filings by imposing a "leave to file restriction". Then, as the Seventh Circuit explained ~~in United States ex rel. Hancock v. Reagan~~ ~~2000 US App LEXIS 36528~~ ~~(7th Cir 2000)~~

"Because this prior-approval requirement imposed considerable burdens on the court yet often was ineffectual, we took a new tack in Supp Sys ... Instead of issuing injunctions, we begin with monetary sanctions. If the litigant pays, no further action is taken. If the litigant does not pay, demonstrating that the financial-sanctions approach is ineffectual, then we enter an order directing the clerks of all federal courts within the circuit to return, unfiled, all complaints and other pleadings until the sanctions are paid in full."

United States ex rel. Hancock v. Reagan 2000 US App LEXIS 36528 (7th Cir 2000)

This is, of course, not what happened here. But, it sounds good. This regime lasted from 1995 to 2009. However, even during this phase of the Seventh Circuit's jurisprudence, some "absolute filing bans" were imposed, citing to Support Systems as the supposed authority. see, eg, Perry v. Milwaukee Pub Schs 12 Fed Appx 406 (7th Cir 2001); Sampson v. Yellow Cab Co 2000 US App LEXIS 8725 (7th Cir 2000); Johnson v. Marion 1999 US App LEXIS 3080 (7th Cir 1999).

25) In 2008, the Fifth Circuit decided Baum v. Blue Moon Ventures, LLC 513 F3d 181 (5th Cir 2008), where it approved of an order barring the Baums from "directly or indirectly [filing] claims in [federal] courts or with [federal] agencies in the state of Texas without the express written permission of Judge Lynn Hughes." This case involved a leave to file order, not an absolute filing ban, but, the Seventh Circuit used it a year later to justify an absolute filing bar in Chapman v. Exec Comm 324 Fed Appx 500 (7th Cir 2009). There, the Executive Committee for the Northern District of Illinois "ordered the clerk for the Northern District of Illinois to destroy any future filings by the litigant, Lamar Chapman, for the next six months." Chapman. The Seventh Circuit approved

this absolute filing bar by insulting the intelligence of those reading the order and talking out the side of its mouth, declaring that the order wasn't an absolute filing bar because "Chapman may request review of the filing bar in six months [and,] The order is not an absolute bar, since it contains a provision under which the restriction may be lifted." Chapman. It also cited in support Support Systems and United States ex rel Verdore v. Circuit Court 73 F3d 669 (7th Cir 1995), another case involving a leave to file order, not an absolute filing bar.

- 26) Since Chapman, the Seventh Circuit has handed out several absolute filing bars, each with increasing and often indefinite durations. see, eg. Dix v. Edelman Fin Servs LLC 978 F3d 507 (7th Cir 2020); Pullen-Walker v. Exec Comm of the US Dist Ct 482 Fed Appx 185 (7th Cir 2012); In Re: Mohammed 834 Fed Appx 240 (7th Cir 2021). Pullen-Walker is a good example of how these absolute filing bars work in practice; initially banned from court for six months, the order was eventually extended for 4½ years before the appeal was filed.
- 27) While every Circuit allows its District Judges to defend their jurisdiction by restricting frivolous filings, none allows a District Judge to abdicate their jurisdiction over certain litigants by placing those litigants outside the law—except the Seventh. see, eg. Castro v. United States 775 F3d 399 (1st Cir 1985); Pavilanis v. King 626 F2d 1075 (1st Cir 1980); In Re: Martin-Trigona 9 F3d 226 (2nd Cir 1993) cert denied 474 US 1061 (1986); Safir v. United States Lines, Inc 792 F2d 19 (2nd Cir 1986); In Re: Oliver 682 F2d 443 (3rd Cir 1982); In Re: Packer Ave Assocs 884 F2d 743 (3rd Cir 1989); Cromer v. Kraft Foods NAm Inc 390 F3d 812 (4th Cir 2004); Baum; Carroll v. Abide (In Re: Carroll) 850 F3d 811 (5th Cir 2017); Balawadger v. Scott 160 F3d 1066 (5th Cir 1998); Ortman v. Thomas 99 F3d 807 (6th Cir 1990); Troft v. Fid Nat'l Title Ins Co 289 F3d 929 (6th Cir 2002); In Re: Tyler 839 F2d 1290 (8th Cir 1988); Wood v. Santa Barbara Chamber of Commerce, Inc 705 F2d 1515 (9th Cir

1993); Moy v. United States 906 F2d 467 (9th Cir 1990); DeLong v. Hennessey 912 F2d 1144 (9th Cir 1990); Molski v. Evergreen Dynasty Corp 500 F3d 1049 (9th Cir 2007); Ringgold-Lockhart v. City of Los Angeles 761 F3d 1057 (9th Cir 2013); Andrews v. Heaton 483 F3d 1070 (10th Cir 2007); Sieverding v. Colo Bar Ass'n 169 F3d 1340 (10th Cir 2006); Procup v. Strickland 792 F2d 1069 (11th Cir 1986) (en banc); Urban v. United Nations 768 F2d 1447 (DC Cir 1985); In Re: Powell 851 F2d 427 (DC Cir 1988). All Circuits except the Second and Fourth allow an absolute bar on further filings in a given case. Safir; Cramer ("imposing a categorical bar on future filings in this case leaves no room for potentially meritorious filings.") But, this is generally rationalized as being in furtherance of principles of res judicata and claim and issue preclusion. Wood. Most Circuits faced with just a leave to file order barring filing of any suit narrow the order to apply only to certain defendants or subjects of litigation. See, eg, Elbery v. Louisa 1999 US App LEXIS 32883 (1st Cir 1999); Himmel v. New York 2000 US App LEXIS 4486 (2nd Cir 2000); In Re: Packer Ave Assocs; Hill v. Umstead 639 Fed Appx 60 (3rd Cir 2018); McPherson v. DA of Chester 621 Fed Appx 704 (3rd Cir 2015); Adkins v. Whole Foods Mkt Grp Inc 795 Fed Appx 217 (4th Cir 2020); Thomas v. Fulton 260 Fed Appx 594 (4th Cir 2008); In Re: Painter 345 Fed Appx 204 (8th Cir 2009); Wood; Kraft v. Hatch 853 Fed Appx 261 (10th Cir 2021); Sieverding; Miller v. Donald 541 F3d 1091 (11th Cir 2018).

28) In fact, because every Circuit other than the Seventh considers orders such as the instant one to be obviously un-Constitutional, it is difficult to find comparable orders from other Circuit. In Procup, in the Eleventh Circuit, the District Court barred Procup "from filing any case with the district court unless submitted by an attorney." Finding that "the injunction effectively enjoins Procup from filing any suit" and that "an absolute bar against a prisoner filing any suit in federal court would be patently unconstitutional," the Eleventh Circuit sitting en banc reversed and remanded, providing the district court with a list of potential

alternate sanctions. Procup. The Sixth Circuit made the same point in Ortman, stating that "We do not believe a person can be absolutely foreclosed from initiating an action in the courts of the United States, though it is permissible to require one who has abused the legal process to make a showing that a tendered lawsuit is not frivolous or vexatious before permitting it to be filed." In In Re: Parker Ave Assocs, the Third Circuit specifically rejected the kind of order the Seventh Circuit approves here, stating that "an order enjoining appellant from filing any further petitions, pleadings or documents whatsoever... is overbroad" and that "[I]t]here is simply no support in the law for permitting an injunction prohibiting a litigant from ever again filing a document in federal court." It also rejected such an order in Hill v. Carpenter 323 Fed Appx 167 (3rd Cir 2009). The Fourth Circuit has twice rejected an absolute filing bar as un-Constitutional, Bates v. Dickens 618 Fed Appx 183 (4th Cir 2015); In Re: Head 174 Fed Appx 167 (4th Cir 2006). The Eighth Circuit found that a leave to file order impairing a litigant's "ability to file any suit in the Eastern District of Missouri" was overbroad. In Re: Pointer 345 Fed Appx 204 (8th Cir 2009). The Ninth Circuit addressed the same concern in Woods, and stated in Molski that District Courts must assure that "litigants and lawyers covered by a pre-filing order are not entirely enjoined from filing suits."

29) Here, the problem was not that I was filing frivolous or meritless litigation. Of the 12 civil actions and 7 habeases cited by the District Court, I won judgment or settlement of 2 habeases and had obtained at least catalyst relief in 3 of my civil actions, while at least 6 actions (including White v. United States) remained pending, several having survived motions to dismiss or for summary judgment. Thus, the Court's order was intended to prevent me from litigating non-frivolous or meritorious claims, and, the step of imposing monetary sanctions was skipped because I had paid and was paying thousands of dollars for my

right to access the courts. Such an order abdicating the jurisdiction of the Court is unprecedented in American law. But, it had the intended effect. Without the law to mediate and determine our relationships, the BOP and I resolved them through violence. And, really, that's how this all got started, when Hale's followers recruited Bart Ross to resolve their dispute with the Courts through violence. The implications are clear: if the Courts are going to abdicate their jurisdiction, problems are not going to disappear. They are simply going to be resolved extralegally. And, that weakens both the state and the rule of law. So, this Court should step in and nip what the Seventh Circuit is doing, abdicating its jurisdiction over certain persons and outlawing them, in the bud, before its social effects spread further.

II. The Seventh Circuit Made False Statements About The Record To Justify Its Order In Collis

30) In its order upholding the sanctions in Collis, the Seventh Circuit simply ignored my arguments that the claimed infraction of the Court's Order, filing Collis Doc 11 unsealed, never happened and could not have happened, since I filed proposed redactions and a motion regarding sealing with it, and, because the District Court had ordered all of my pleadings placed under seal, Collis Doc 7. The Seventh Circuit then falsely stated that I "boasted that donors would pay any fine" in some unspecified other document in some unspecified other case - a document which simply doesn't exist.

31) The deliberate use of false statements about the record to justify a sanctions order was clearly erroneous and a violation of Due Process. Lower court orders are "clearly erroneous" when, although there is evidence to support it, the reviewing court on the entire evidence is left with a definite and firm conviction that a mistake has been committed." Anderson v. Bessemer City 470 US 564 (1984) citing

United States v. United States Gypsum Co 333 US 304 (1948). Typically, this involves situations where the lower courts summary of the evidence is "plausible" or where there are "two permissible views of the evidence" Anderson; Amadeo v. Zant 486 US 214 (1988). And, this Court has previously warned the Circuits against "im-permissible appellate factfinding," Iceberg Seafoods, Inc v. Worthington 475 US 709 (1986) apud Amadeo. This, here, is something much more extreme - misstatements of the record, mis-statements that one must assume are deliberate - in order to justify an un-Constitutional usurpation, and, made in the assumption that this Court will not provide effective appellate review. A functioning judicial system cannot permit this attack on rule of law by judges sworn to uphold it.

III. The Seventh Circuit Improperly Imposed A \$1000 Fine

32) The Seventh Circuit sanctioned me \$1000 for "baselessly accus[ing] the judge of 'fixing cases, lying and dementia.'" This comes from me referencing and discussing my conduct - and Judge Gilbert's conduct - in the District Court that led to the instant sanctions, and, appears in para 15-16, 20, 37, and 53-54 of my opening brief. There was no way for me to contest the sanctions orders without discussing the conduct that led to the sanctions. The Ninth Circuit has specifically rejected sanctioning litigants in these circumstances, stating in Ringgold-Lockhart that:

"The district court faults the Ringolds for 'reiterating old facts and arguments' in their response to the court order [to show cause]. As the Ringolds had to argue that the filings were not frivolous, such repetition was inevitable. What's more, the district court invited the response, so it was particularly inappropriate to hold it against them."

Here, the \$1000 fine was just another abuse heaped on top of a pile of abuses reflecting the corruption and lack of respect for rule of law that has poisoned the Seventh Circuit. The \$1000 sanction should be reversed with the rest of the Courts order.

IV. I Did Not File An Untrue IFP Application In White v. United States

- 33) The Seventh Circuit faults me for not disclosing four categories of income:
- a) "tens of thousands of dollars of donations from supporters since 2015";
 - b) "hundreds of dollars in regular deposits in his trust account by his mother";
 - c) "thousands of dollars available to pay expert witnesses in other cases"; and,
 - d) "income from book sales."

There are multiple problems with this, all stemming from the distinct lack of evidence that any of this money was received at any specific time, forcing the Seventh Circuit to assert that I was responsible for disclosing money that I either did disclose or wasn't asked to disclose.

- 34) When the District Court appointed me counsel in October 2017, it ordered me not to file any further documents with the Court. And, the evidence, including my testimony and the receipts I received from counsel is that counsel knew I was raising money - after all I gave him \$14,000 of it - told me he would report it and didn't do so. Because counsel actively misled me into believing he had reported this fundraising to the court, because counsel was legally obligated to make such reports, and, because I unquestionably informed counsel of the money by giving it to him, this was a case where my counsel, not I, made the error and concealed it from me. As such, I cannot be held responsible for not reporting the money made after counsel was appointed.

- 35) Similarly, the PLRA does not require me to report income. It only requires me to provide six months worth of trust account statements. The District Court found that I incurred an obligation to report one year's worth of income by returning the declaration it provided me. Even so, this would not have extended the time prior to the August 2017 IFP filing into 2015. Thus, I have no obligation

"Since 2015."

- 36) The evidence in this matter - my testimony - is that, between January 2015 and December 2017, my friend Paul Angel raised about \$17,500 and gave it to my mother as repayment of \$17,500 in expenses incurred on my behalf between December 2014 and July 2016, outside of the relevant six and twelve month reporting periods. When I filed my IFP application, I disclosed regular deposits to my prison trust account of over \$500 per month by submitting my full trust statements. Over a three year period (2015, 2016, 2017), this amounts to \$18,000, just about the amount in contest. What I did not do was copy this information from the trust fund statement to the declaration, and, I did not do this because I did not believe the declaration covered trust fund deposits (because why would I be asked to report this income twice?)
- 37) As such, the four categories of money identified by the Seventh Circuit are all the same money. There was no evidence of "income from book sales", and, any such money was included in my estimate of "donations from supporters". The money available in 2020 to pay expert witnesses was those same donations. And, all "donations" received prior to the filing of my IFP application were received by my mother, who transferred an equivalent amount to my inmate trust account. The Seventh Circuit deliberately mis-stated these facts, likely hoping to confuse the issue and prevent review.
- 38) The Seventh Circuit has no consistent case law on whether submitting an inmate trust account statement to the court constitutes sufficient disclosure of an inmate's income. Four cases suggest it is: Robertson v. French 949 F3d 347 (7th Cir 2020), Ruiz v. Bautista 801 Fed Appx 439 (7th Cir 2020), Hodge v. Ghosh 592 Fed Appx 522 (7th Cir 2015), and, Childress v. Kerr 803

Fed Appx 949 (7th Cir 2020). But, in three cases, the Seventh Circuit has specifically found that its not: Haywood v. Wexford Health Services 2021 US App LEXIS 30707 (7th Cir 2021), Coleman v. Calumet City 754 Fed Appx 468 (7th Cir 2019), and, Donelson v. Tanner 768 Fed Appx 724 (7th Cir 2019). This application of the law is so arbitrary and capricious as to be lawless, and, it invites this Court's intervention.

39) No other Circuit's case law supports the proposition in this case that attaching my trust statement to the IFP application was insufficient to disclose my income. In fact, interpretation of 28 USC §1915 (e)(2)(A) outside of the Seventh Circuit is remarkably uniform. "[T]he statute [28 USC §1915(e)(2)(A)] cannot possibly be applied literally; if it were, then every time such a petition was denied... the case would have to be dismissed... Courts therefore interpret the statute to require dismissal when an application contains false or misleading statements or omissions which could lead a court to grant the application even though the petitioner was not actually impoverished." Doyle v. Babine 2021 US Dist LEXIS 121025 (D Me 2021) citing Davis v. Green 2009 US Dist LEXIS 10471 (SD Ind 2009); see also, Vann v. Comm'r of the NY Dept of Corr 496 F Appx 113 (2nd Cir 2012); Adkins v. E.I. DuPont de Nemours & Co 335 US 331 (1948). The Eighth Circuit has elaborated further, stating that the dismissal requirement of the PLRA "does not mandate that the district court dismiss [a pro se plaintiff's] claim if it finds that certain allegations in his affidavit are untrue; instead, it requires the district court to dismiss the claim if it finds that [the litigant] is not sufficiently poor to qualify for in forma pauperis status given the facts that are true." Lee v. McDonald's Corp 231 F3d 456 (8th Cir 2000).

40) The Eleventh Circuit is the only Circuit to address the question of whether or not attaching a trust statement to an IFP application sufficiently discloses a prisoner's

income to the trust account (other than the Seventh), and, it has found that it is in a series of cases. Camp v. Oliver 798 F2d 434 (11th Cir 1986); Matthews v. Craigher 402 F2d 877 (11th Cir 1990); Ross v. Fagan 635 Fed Appx 824 (11th Cir 2016)

41) Further, the District Court stated and the Seventh Circuit implied that I should have disclosed my mothers (and, before his death, my fathers) assets. No Circuit has found that a litigant must disclose family members' assets, even spousal assets, if they are not available on demand. In McCafferty v. Portage City 2021 US App LEXIS 35894 (6th Cir 2021), the defendants argued that, because McCafferty's parents were willing to support him, McCafferty should have disclosed his parents' assets on the IFP form. The Sixth Circuit, pointing to Sellers v. United States 881 F2d 1061 (11th Cir 1989) (per curiam), stated that money McCafferty had received from family sources, such as money placed in McCafferty's accounts and a \$5000 cash bond, should have been reported. But, did not endorse the view that assets belonging to McCafferty's parents should have been reported. Sellers supports the same conclusion. And, in Lee, Lee failed to declare any of his wife - whom he lived with - substantial assets, but, the Eighth Circuit found that even though Lee misrepresented his wife's assets on the IFP application, his application was not "untrue" because he couldn't dispose of his wife's assets or their communal assets at will.

42) Courts have also imposed a materiality requirement before an IFP application can be found to be "untrue." In Floyd v. Lee 85F Supp 3d 482 (DDC 2015), Floyd was unemployed when she filed suit but failed to declare \$33,332 in income received in the year prior to filing the application. The DC District Court found this omission immaterial because Floyd had no current income at the time the application was made. It also found that "a few thousand dollars" in student debt relief Floyd had received was immaterial because "even if she had

listed the amount as income she would have been able to list the loan as a debt. Floyd. In his dissent in Nottingham v. Warden, Bill Clements Unit 837 F3d 438 (5th Cir 2016) (Haynes, dissent), Judge Haynes of the Fifth Circuit further stated that statements in IFP applications should only be deemed "untrue" if the legal proposition that something should be disclosed is obvious. Ross, too, involved "mistakes" which "were not prejudicial."

43) Here, Paul Angel raised \$17,500 and gave it to my mother to pay my legal debts at times and in amounts unknown to both me and the court. That this should have been disclosed is far from "obvious." But, it was. My trust account statement showed \$18,000 in deposits (over \$500/month) during this three year period. No "lie" was told, nothing was concealed from the court, and my IFP application was simply not "untrue." Especially in the context of the Seventh Circuit's and Judge Gilbert's other statements about me and their false statements about the record in this matter, this was a malicious finding and it should be reversed.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,



Date: 10/12/22