

22-6260 ORIGINAL

No. _____

Supreme Court, U.S.
FILED

SEP 19 2022

OFFICE OF THE CLERK

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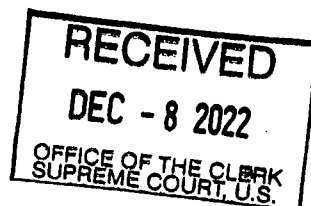
SUPREME COURT OF THE UNITED STATES

PAULA W. WILLIAMS — PETITIONER
(Your Name)

vs.

CONDUENT HUMAN SERVICES LLC. — 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)

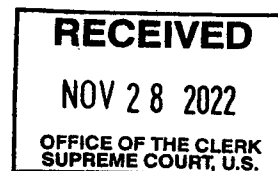
PETITION FOR WRIT OF CERTIORARI

PAULA W. WILLIAMS
(Your Name)

2022 ROGER STREET
(Address)

SOUTH BEND, IN, 46628
(City, State, Zip Code)

574-315-4219
(Phone Number)



COVER PAGE

QUESTIONS PRESENTED:

1. Does the district court have subject matter jurisdiction over this case?
2. Do the actions and conduct of the district court in this specific individual case appear tantamount to Judicial Disability and conduct considered parallel to insurrection and rebellion as described in section three of the Fourteenth Amendment of the United States Constitution?: • Does the unauthorized practice of law as performed and explained by the affiliated state agencies, tribunal, and the employer's legal defense in this specific individual case parallel conduct tantamount to: deprivation of constitutional and fundamental rights? Per the First, Fifth, Seventh, Tenth, Thirteenth, and Fourteenth Amendments of the United States Constitution? In this individual case; Does the lower court tribunal have a legitimate, legal right, to deny an ignorant, indigent, unrepresented, disabled, African American woman's right to an appeal per the First Amendment, Fifth Amendment, and Section One of the Fourteenth Amendment of the United States Constitution?
3. Do the actions and conduct of the district court in this specific individual case appear tantamount to Judicial Disability and conduct considered parallel to hate crimes, white supremacy, and witness tampering as described in the First Amendment, Fifth Amendment, and section One of the Fourteenth Amendment of the United States Constitution? • Do the defendant's and lower court tribunal's practice and explanation of pleading defenses as performed in this specific individual case parallel conduct tantamount to deprivation of constitutional and fundamental rights? Per the First, Fifth, Seventh, Tenth, Thirteenth, and Fourteenth Amendments of the United States Constitution?
4. Do the actions and conduct of the employer, the state of Indiana, and the lower courts in this specific individual case appear tantamount to: Discriminatory practices and conduct considered parallel to Deprivation of fundamental rights, as described in the First Amendment, Fifth Amendment, section One of the Thirteenth Amendment and section Three of the Fourteenth Amendment of the United States Constitution? • Do any of the actions in this case: parallel conduct equal to: obstruction of justice, witness tampering, Insurrection and rebellion, and Involuntary Servitude per the United States Constitution?
5. Do the actions and conduct of the Employer in this specific individual case appear tantamount to Respondeat Superior, Promissory Estoppel, Improper Employment Practices, Misrepresentation, Misconduct, Abuse of Process and conduct considered parallel to insurrection and rebellion as described in section Four of the Fourteenth Amendment of the United States Constitution?
6. Does the absolute sovereignty of a state prevail over the absolute sovereignty of a person's individual rights; or the absolute sovereignty of the Constitution of the United states; if the actions and conduct of the state in question appear corrupt and tantamount to conduct parallel to Improper Employment Practices, Misrepresentation, Misconduct, Abuse of

SECTION #2 QUESTIONS PRESENTED 1

Process as described in the Tenth Amendment and Section Three of the Fourteenth Amendment of the United States Constitution? And are those actions and conduct considered parallel to insurrection, rebellion, FRAUD of government funds, and Breach of Contract as described in Section Three and Four of the Fourteenth Amendment of the United States Constitution?

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: **Beginning with the attorneys for the defendant [Conduent Human Services, LLC**

STEPHEN L. SCOTT ESQ.; sls@kullmanlaw.com

LINDA A. MANN - paralegal: lam@kullmanlaw.com

JENNIFER S. SIMS ESQ.; jds@kullmanlaw.com

INDIANA ATTORNEY GENERAL: Indiana Government Center South: 302 W. Washington St., 5th Floor, Indianapolis, IN 46204

THE OFFICE OF GOVERNOR ERIC HOLCOMB: 200 W. Washington St. Rm. 206, Indianapolis, IN 46204

THE SOLICITOR GENERAL OF THE UNITED STATES: Room 5614, Department of Justice, 950 Pennsylvania Ave., N.W., Washington, D.C. 20530-0001

RELATED CASES

3:19-CV-1062-DRL-MGG

3:19-CV-1061-DRL-MGG

01-20-0015-5714

22-1027

22-1226

22-1376

SECTION #3 LIST OF PARTIES

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- Natayisa UI 1st Covid 19 Application Claim Homepage Determination Information 04.2020 - Google Docs
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- Gmail August 2021- Notice Regarding Ending of Federal Pandemic Unemployment Benefits
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- 2022-06-02 14.55.39 PAULA & NATAYISA ENERGY ASSISTANCE AWARD
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- Indian Springs Apartments _ Apartments in South Bend, IN _Payment Screen October 2021
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- State Expenditures 2022 dqs_table_97_5.pdf
- Natayisa 1st Extension Request_ Housing Choice Voucher Program_ - Google Docs.pdf
- Laverne Griffin Doctor's Note 08.23.2021.PDF
- Laverne FSSA SNAP Change document 05.24.2022.pdf
- Laverne FSSA POE Document 05.24.2022.pdf
- Laverne FSSA document 12.2021.pdf

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- Laverne FSSA document 03.2022 .pdf
- Laverne FSSA document 01.2022.pdf
- Indiana Disciplinary Commission.PDF
- House Bill 2578-S2.PL.pdf
- HCV pih_inspection_resumption_flyer.pdf
- Government Info 1 os-a11y-section508-contract-language.pdf
- Laverne SNAP REDET Verifications 02.10.2022 redacted.pdf
- Laverne Housing Authority Verifications 08.2021.PDF

Requests for Help: pgs. 1-72

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- MY REQUEST TO AAA FOR HELP
- Gmail - Indiana Legal Services, Inc
- INDIANA LEGAL SERVICES DOCUMENT
- Gmail - Your Rental Assistance Application has been Declined
- EEOC FOIA FILE 1 - A - E - Williams.Paula - 2056 1
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- SUBMISSION TO CIVIL RIGHTS DIVISION
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- Docket #3 01062 - IN FORMA PAUPERIS MOTION
- #5 NOTICE OF APPEARANCE TASHA ROBERTS
- #6(2) DEFENDANT WAIVER OF SUMMONS SUBMITTED - TASHA ROBERTS
- Covid-19 Policy 6-24-22 SB INDIANA COVID-19 POLICY ADOPTED 11.01.2020
- DISTRICT COURT CLERK ACTIONS EVIDENCE SUBMITTED 03.28.2022
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- Oaths Taken and Broken
- Gmail - 6220448 July 2022 PACER Quarterly Invoice
- Gmail - PACER Account Registration Created 12.17.2019
- Gmail - PACER Account Settings Changed 12.17.2019
- Correspondence from AAA 09.22.2021

- 2022-01-03 - AAA - Closing Letter
 - rom Arbitrator Correspondence Gmail - Williams v. Conduent - Respondent's Motion to Dismiss
 - Gmail - Paula Williams v ARBITRATION ACTIONS
 - Gmail - Password Reset AAA correspondence
 - SNAP 03.2022 Award Letter
 - IN-SNAP-COVID-EA-Extension-May-2022-Acknowledged (1)
 - State Template – FFCRA SNAP Emergency Allotment Request
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LEGISLATION:

The United States Declaration of Independence:

First Amendment

- 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.**

Fifth Amendment

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

Seventh Amendment

- **In Suits at common law, where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved,**

- and no fact tried by a jury, shall be otherwise reexamined in any Court of the United States, **than according to the rules of the common law.**

10th Amendment

- The powers not delegated to the United States by the Constitution, nor prohibited by it to the States,
- **are reserved to the States respectively, or to the people.**

13th Amendment

Section 1

Neither slavery **nor involuntary servitude**, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction.

Section 2

Congress shall have power to enforce this article by appropriate legislation.

14th Amendment

Section 1

- All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside.
- No State shall make or enforce any law which shall **abridge the privileges or immunities of citizens of the United States;**
- nor shall any **State deprive any person of life, liberty, or property, without due process of law;**
- **nor deny to any person within its jurisdiction the equal protection of the laws.**

Section 3

- No person shall be a Senator or Representative in Congress,
- or elector of President and Vice-President,
- **or hold any office,**
- **civil or military, under the United States,**
- or under any State,
- **who, having previously taken an oath,** as a member of Congress, or as an officer of the United States,
- or as a member of any State legislature,
- or as an executive
- **or judicial officer of any State,**
- to support the Constitution of the United States, **shall have engaged in insurrection**
- **or rebellion against the same,**
- or given aid or comfort to the enemies thereof.
- But Congress may by a vote of two-thirds of each House, remove such disability.

Section 4

- The validity of the public debt of the United States,
- authorized by law,
- including debts incurred for payment of pensions and bounties for services in suppressing
- **insurrection or rebellion,**
- shall not be questioned.
- But neither the United States nor any State shall assume or pay any debt or obligation incurred **in aid of insurrection or rebellion against the United States,**
- or any claim for the loss or emancipation of any slave;

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- but all such debts, obligations and claims shall be held illegal and void.

INDIANA Disciplinary Conduct Rules:

Rule 3. Admission of Attorneys Section 1.

(b) Responsibilities of Attorneys.

(c) Failure to Register, or Otherwise Perform as Required.

INDIANA CONSTITUTION:

- The Declaration Of Independence Of The United States of America

CASE LAW:

JI Case Co. v. Borak, 377 U.S. 426 (1964)

Ledbetter: 550 U.S. 618 (2007)

Ashcroft v. Iqbal, 556 U.S. 662 (2009)

Citizens United v. FEC, 558 U.S. 310 (2010)

Shelby County v. Holder, 570 U.S. 529 (2013)

Brown v. Board of Education of
Topeka, 347 U.S. 483 (1954)

Pollock v. Williams (1944), Involuntary Servitude

FEDERAL LAW:

Fed. R. Civ. P. 60(d)(3) - Fraud on the Court

Fed. R. Civ. P. **Rule 12(b)(1) and (h)(3).**

Amount in controversy: § 1446(c)(2):

Fed. R. Civ. P. Joinder Under Rule 18(a)

Rule 20(a)(2) permits joinder of multiple

defendants

Fed. R. Civ. P. Rule 8(a)(2)

Rule 57 FEDERAL RULES OF CIVIL PROCEDURE 82 Rule 57.

Rule 60. Relief from a Judgment or Order

N.D. Ind. L.R. 83-6.2 Grounds for Discipline (a) Court's Authority.

PUBLIC POLICY:

979. IMPACT OF HHS PRIVACY RULES ON DEPARTMENT OPERATIONS

9-28.010 - FOUNDATIONAL PRINCIPLES OF CORPORATE PROSECUTION

9-28.100 - DUTIES OF FEDERAL PROSECUTORS AND DUTIES OF CORPORATE LEADERS

9-28.200 - GENERAL CONSIDERATIONS OF CORPORATE LIABILITY

9-28.210 - FOCUS ON INDIVIDUAL WRONGDOERS

9-28.300 - FACTORS TO BE CONSIDERED (see JM 9-28.500);

(see JM 9-28.600)

(see JM 9-28.1000);

(see JM 9-28.1200);

(see JM 9-28.1400).

USSG § 8C2.5, cmt. (n. 4).

See USSG § 8C2.5(c), cmt. (n. 6).

9-28.600 - THE CORPORATION'S PAST HISTORY

37 CFR 11.505 (up to date as of 8/12/2022) Unauthorized practice of law.

§ 11.505 Unauthorized practice of law. A practitioner shall not practice law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, or assist another in doing so.

[10 U.S.C. 654(d)(1)(2) - don't ask don't tell policy]

(Pub. L. 103–160, div. A, title V, §571(a)(1), Nov. 30, 1993, 107 Stat. 1670.)

MEMBERS OF LABOR ORGANIZATIONS

§ 411. Bill of rights; constitution and bylaws of labor organizations:

TITLE 9—ARBITRATION

CHAPTER 7—LABOR-MANAGEMENT RELATIONS

CHAPTER 8—FAIR LABOR STANDARDS

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**CHAPTER 15—OCCUPATIONAL SAFETY AND
HEALTH**

Public Law No: 112-63 (12/07/2011)

18 U.S.C. § 245. Federally protected activities = HATE CRIMES

Rule 15. Amended and Supplemental Pleading

S.4054 - Notice Pleading Restoration Act of 2010 - (introduced 12/22/2010) = PLEADING

H.R.7706 - Judicial Ethics and Anti-Corruption Act of 2022

H.Res.844 - Justice for All Resolution

Fraudulent Joinder Prevention Act of 2016

Lawsuit Abuse Reduction Act - Amends Rule 11

Rule 3. Admission of Attorneys Section 1.

Privacy Protection Act of 1974:

- 5 U.S.C. § 552a(m)(1)

Whistleblower Protection Act of 1989, 5 U.S.C. § 2302(b)(8)-(9)

EEO Act of 1972.

the Health Insurance Portability and Accountability Act of 1996 (HIPAA).

Fed. R. Civ. P. 26(f); 16(b); 36; 37; 55;

(Uniform Arbitration Act)

(Federal Arbitration Act, 9 U.S.C § 1. et seq., as amended)

(The Conduent Business Services Dispute Resolution Plan)

(Conduent Business Services Dispute Resolution Rules) or DRP

(CM - 612 Discharge/Discipline | U.S. Equal Employment Opportunity Commission)

(Effective Position Statements | U.S. Equal Employment Opportunity Commission)

(EEOC Threshold Policy: EEOC-CVG-2000-2 Section 2 Threshold Issues)

Lilly Ledbetter Fair Pay Act

18 U.S. Code § 666 - Theft or bribery concerning
programs receiving Federal funds

**Rule 37. Failure to Make Disclosures or to Cooperate in
Discovery; Sanctions**

Ind. R. Trial. P. 18

28 U.S.C. § 1343

Section 242 of Title 18 makes it a crime

Federal Court under Title 42 United States Code standard 1983.

Asserting Ethical Duty

USC 28 Chap. 21 §455 = NO LEGAL ADVICE

Hate Crimes Prevention Act of 2009

The Fair Housing Act, 42 U.S.C. § 3601 et seq.

The Age Discrimination Act of 1975, 42 U.S.C. § 6101 et seq.

The Americans with Disabilities Act of 1990, 42 USC § 12101 et seq.

S.505 - Forced Arbitration Injustice Repeal Act -not a law yet?

H.R.4445 - Ending Forced Arbitration of Sexual Assault and Sexual Harassment Act of 2021

117th Congress (2021-2022)

136 STAT. 26 PUBLIC LAW 117-90—MAR. 3, 2022

Public Law No: 117-90 (03/03/2022)

S.4174 - Wage Theft Prevention and Wage Recovery Act - not a law yet?

H.R.394 - Federal Courts Jurisdiction and Venue Clarification Act of 2011

112th Congress (2011-2012)

Sponsor: Rep. Smith, Lamar [R-TX-21] (Introduced 01/24/2011)

Committees: House - Judiciary | Senate - Judiciary

Public Law No: 112-63 (12/07/2011)

S. Rept. 104-392 - LEGAL SERVICES REFORM ACT OF 1996

104th Congress (1995-1996)

S.1221 - Legal Services Reform Act of 1996

104th Congress (1995-1996)

H.R.4157 - Economic Inclusion Civil Rights Act of 2021 - not a law yet?

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H.R.595 - COVID-19 Justice and Accountability Act

S.937 - COVID-19 Hate Crimes Act

Public Law No: 117-13 (05/20/2021)

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 p. 60 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 United States district court appears at Appendix p. 6 to the petition and is

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

☐ For cases from **state courts**: N/A

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.

1.

SECTION #5 CITATION LIST

JURISDICTION

☒ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was 05/10/2022.

☐ 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: 06/22/2022, and a copy of the order denying rehearing appears at Appendix p. 70.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including N/A (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**: N/A

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).

SECTION #6 JURISDICTIONAL STATEMENT

CONSTITUTION AND STATUTORY PROVISIONS:

First Amendment

- 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.

Fifth Amendment

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

Seventh Amendment

- In Suits at common law , where the value in controversy shall exceed twenty dollars, the right of trial by jury shall be preserved,
- and no fact tried by a jury, shall be otherwise reexamined in any Court of the United States, than according to the rules of the common law.

10th Amendment

- The powers not delegated to the United States by the Constitution, nor prohibited by it to the States,
- are reserved to the States respectively, or to the people.

13th Amendment

Section 1

Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction.

Section 2

Congress shall have power to enforce this article by appropriate legislation.

14th Amendment

Section 1

- All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside.
- No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States;
- nor shall any State deprive any person of life, liberty, or property, without due process of law;
- nor deny to any person within its jurisdiction the equal protection of the laws.

Section 3

- No person shall be a Senator or Representative in Congress,
- or elector of President and Vice-President,
- or hold any office,
- civil or military, under the United States,
- or under any State,
- who, having previously taken an oath , as a member of Congress, or as an officer of the United States,
- or as a member of any State legislature,
- or as an executive
- or judicial officer of any State,
- to support the Constitution of the United States, shall have engaged in insurrection
- or rebellion against the same,
- or given aid or comfort to the enemies thereof.
- But Congress may by a vote of two-thirds of each House, remove such disability.

Section 4

- The validity of the public debt of the United States,
- authorized by law,

- including debts incurred for payment of pensions and bounties for services in suppressing
- insurrection or rebellion,
- shall not be questioned.
- But neither the United States nor any State shall assume or pay any debt or obligation incurred in aid of insurrection or rebellion against the United States,
- or any claim for the loss or emancipation of any slave;
- but all such debts, obligations and claims shall be held illegal and void.

- INDIANA CONSTITUTION

STATUTORY PROVISIONS:

- 37 CFR 11.505 (up to date as of 8/12/2022) Unauthorized practice of law.
§ 11.505 Unauthorized practice of law. A practitioner shall not practice law in a jurisdiction in violation of the regulation of the legal profession in that jurisdiction, or assist another in doing so.
- S. Rept. 104-392 - LEGAL SERVICES REFORM ACT OF 1996
104th Congress (1995-1996)
S.1221 - Legal Services Reform Act of 1996
104th Congress (1995-1996)
- Asserting Ethical Duty
USC 28 Chap. 21 §455 = NO LEGAL ADVICE
- [10 U.S.C. 654(d)(1)(2) - don't ask don't tell policy]
(Pub. L. 103-160, div. A, title V, §571(a)(1), Nov. 30, 1993, 107 Stat. 1670.)
- MEMBERS OF LABOR ORGANIZATIONS
§ 411. Bill of rights; constitution and bylaws of labor organizations:
TITLE 9—ARBITRATION
CHAPTER 7—LABOR-MANAGEMENT RELATIONS
CHAPTER 8—FAIR LABOR STANDARDS

- Public Law No: 112-63 (12/07/2011)
18 U.S.C. § 245. Federally protected activities = HATE CRIMES
- Privacy Protection Act of 1974:
- 5 U.S.C. § 552a(m)(1)
- Whistleblower Protection Act of 1989, 5 U.S.C. § 2302(b)(8)-(9)
- EEO Act of 1972.
- the Health Insurance Portability and Accountability Act of 1996 (HIPAA).
- Lilly Ledbetter Fair Pay Act
- 18 U.S. Code § 666 - Theft or bribery concerning programs receiving Federal funds
- Hate Crimes Prevention Act of 2009
- H.R.595 - COVID-19 Justice and Accountability Act
- S.937 - COVID-19 Hate Crimes Act
Public Law No: 117-13 (05/20/2021)
- 28 U.S.C. § 1343
Section 242 of Title 18 makes it a crime
- The Fair Housing Act, 42 U.S.C. § 3601 et seq.
- The Age Discrimination Act of 1975, 42 U.S.C. § 6101 et seq.
- The Americans with Disabilities Act of 1990, 42 USC § 12101 et seq.
- H.R.4445 - Ending Forced Arbitration of Sexual Assault and Sexual Harassment Act of 2021
117th Congress (2021-2022)
- 136 STAT. 26 PUBLIC LAW 117-90—MAR. 3, 2022
Public Law No: 117-90 (03/03/2022)

SECTION #7 CONSTITUTION & STATUTORY PROVISIONS 4

- H.R.394 - Federal Courts Jurisdiction and Venue Clarification Act of 2011
112th Congress (2011-2012)
Sponsor: Rep. Smith, Lamar [R-TX-21] (Introduced 01/24/2011)
Committees: House - Judiciary | Senate - Judiciary
Public Law No: 112-63 (12/07/2011)
- IQBAL
- The Declaration Of Independence Of The United States of America

PENDING LAW:

- H.R.4157 - Economic Inclusion Civil Rights Act of 2021
- S.4174 - Wage Theft Prevention and Wage Recovery Act
- S.505 - Forced Arbitration Injustice Repeal Act

Statement Of Case:

FACTUAL:

Evidence concerning employment practice pleadings listed in [EEOC FOIA File Evidence @ DE # 34].

BEGINNING IN TRAINING:

Ja'van Smith, training class, and friends: Janice Nichols; Bridget Hankins; Kim Easton:

[1]

I began working for the Indiana Eligibility Project on September 9, 2013 as a contracted employee for the CFA Staffing Service Eligibility Specialist Training Program.

The program trainer at that time was Ja'van Smith, an African American Male. A few days into the training program Javan began to joke inappropriately calling the me **"Can't Get Right" (A mentally retarded character from the motion picture movie "Life" starring Martin Lawrence and Eddie Murphy)** because of my inability to read and communicate eloquently. Ja'van Smith then encouraged the entire training class to behave in a like manner by publicly humiliating me everyday of the class with jokes and references to my **"dumb"** questions, or my inability to **"pay attention"**, or my inability to **"read"** aloud without stuttering and fumbling or missing words.

- a. **Conduct appearing heartless discriminatory and unprofessional** : making rude jokes and laughing out loud when I read. Making constant references to me as retarded (**Can't Get Right**) when I would ask questions for help.

[2]

After I spoke with Ja'van privately and communicated to him that I was uncomfortable with his comments and that his comments were embarrassing and humiliating to me. Javan became cruel. He openly expressed his disapproval with my inability to **"take a joke"**. Ja'van then labeled me as difficult and communicated to everyone that I had a bad attitude. Even though I expressed my disapproval and embarrassment of his jokes and behavior towards me, Javan continued to refer to me as **"Can't Get Right"** and continued to encourage other members of the class and Xerox staff (Janice Nichols; Bridget

SECTION #8 STATEMENT OF CASE 1

Hankins; Kim Easton) to harass and insult me. I became a target. Daily Ja'ven (after having "actual knowledge" of my embarrassment because of our discussion) purposely called on me to read aloud in the class and he was well aware of my difficulties doing so. Every time I was targeted or singled out among the other 36 members of the training class, I felt even more embarrassed and humiliated because when I tried to read I could not read through even one sentence without stuttering and stammering through the passage. At that time I was unaware of why I was a thirty-five year old woman who knew how to read; I just physically could not and why I read very slowly. I was later diagnosed with Dyslexia and ADHD. I had never been aware of the diagnosis prior to 2018. **[Evidence submitted to district court and appellate court]**

- b. **Humiliating degrading disrespectful** : making comments about my intelligence, TANF check, me not deserving the job, and I'm so stupid they don't know how I keep passing the exams. 2

[3]

After I graduated from the training program, I remained employed with the CFA staffing Agency until the next Xerox hiring cycle that takes place after every training period. How the process works:

- After a worker finishes the Xerox State Eligibility training course then there may be some time elapsed before the worker has an opportunity to be offered a position of permanent employment.

During the waiting period before I was offered a position of employment, members of the training class began posting humiliating comments about me on social media (Facebook). I was alerted to these activities by another training co-worker, who showed me the posts because I was not a member of the Facebook group. I reported the actions to the **Xerox operations manager Tara Richie**. I informed Tara that because of Ja'ven's actions and negative comments about me, members of the training class had posted my picture on their Facebook group page with derogatory comments about me attached.

- c. **Informed slander libel harassment and bullying gossiping** : making comments about my clothes, my hair, my body, 3

[4]

SECTION #8 STATEMENT OF CASE 2

Tara Richie informed me that Ja'van was not actually a Xerox employee, he was also a contract employee that was hired specifically to run their training courses. Tara also made a point to inform me that Ja'van was a successful trainer for the Company (Xerox) who graduates most of his classes successfully. Tara stated she would speak to Ja'van but there was nothing much she could do because Ja'Van Smith was not a Xerox employee. She also stated that she could not do much about the other members posting my pictures and comments on their group Facebook page unless I could prove that they were posting during work hours. Tara Richie made it clear that there would not be much action she could take to protect me in that situation, and if these employees were to approach me outside of work the company could not protect me then either. Tara gave me the impression that I would have to protect myself and the company (Xerox) could not get involved. Even though the pictures the class members were posting were taken for the company during our class graduation ceremony. I did not specifically consent to take any photos they were forced on us (the training class) as we were handed our diplomas. And I certainly did not agree for my picture to be posted on any social media site.

I also want to make mention of the fact that at the time of these specific actions of the training class members posting my photos on facebook I was not just an employee of the "Company" I was a client. My daughter and I were receiving state medicaid (the very same benefits our job site was processing). Therefore, the training employees were not only harassing a staff member and coworker they were harassing a client.

[5]

The harassment continued until the staffing manager from CFA came and spoke with me and one of the training class members (**Jessica Jerrimillo - the only class member who admitted to the wrongdoing and her and I had words about the conflict after work when we saw each other at the Dollar General Store**) those specific members of the class were no longer employed with the project. Which, for most of the class, was only several months after graduation.

[6]

Ja'van remained employed by the project (Ja'van also transferred from working in the Conduent office when he was promoted to a State Eligibility Manager and began working directly for the State of Indiana in the Division of Family Resources FSSA office located directly upstairs from the Conduent Regional Change Center office in the same building), and his harassing and humiliating actions towards me continued with him, making rude jokes concerning my hair and appearance with the new training classes. Every time a new class was introduced to the facility under Ja'van's instruction, it appeared everyone in the class was issued my name and Ja'van's opinion of me. I became very popular at the work site apparently, but not because I knew the new employees, it was because Ja'van and his friends (Janice Nichols and Bridget Hankins) made sure everyone who came in knew who I was.

SECTION #8 STATEMENT OF CASE 3

[7]

When the apparent hostile work environment began I kept my distance; I kept my head down; and maintained a professional demeanor at all times while I was employed. I am a single mother, with no qualifying education and a developmental disability. My daughter was in high school in 2013 and by 2015 she was off to college. I did not have the financial freedom or stability to quit my job or be fired because of some apparent harassing coworkers. I am the sole breadwinner in my home and I have a child who is totally dependent on me to provide for her and her future.

- d. **Relentless, vicious, and malicious** : continued to slander me as he informed new employees who i was specifically. Introduced me as the trouble maker, having rude and disrespectful demeanor and behavior, not approachable and unintelligent. 4

Apparent CONTINUED DISCRIMINATION AFTER HIRED BY COMPANY:

Ja'van Smith, Kim Easton Janice Nichols, Bridget Hankins, Tara Richie, Sandi Shanklin-Owens and friends:

[8]

Because of the apparent disability discrimination initiated by Javan Smith, I became known to staff members as "slow" and "unintelligent". Some supervisors (including but not limited to: Janice Nichols, Bridget Hankins, Sandi-shanklin-Owens, Kim Easton, Michelle Horn and Tara Richie) appeared even bold enough to refer to me as stupid when talking to other coworkers and in-front of other co-workers. Janice Nichols and Bridget Hankins expressed their negative opinions of my "inadequacies" of performance and my "lack of intelligence" daily.

SECTION #8 STATEMENT OF CASE 4

[9]

In June of 2016, a new employee (**Cassandra Atkins**) was added to the hearing team. She was assigned to sit with me to observe me in my hearings presentations with the administrative law judge (**Jessica Manis**). **Cassandra** was introduced to me by our team coach (**Lori Wallace**). Lori informed **Cassandra** that I had been a member of the team longer than her, and suggested that I may know a lot more than her because of my tenure with the company. At that time, Janice Nichols began to laugh disrespectfully and made the apparent discriminating comment, “yeah right”. As if, she was suggesting that I do not know much. Janice frequently gave the appearance of conduct parallel to discriminatory practices when she made similar comments concerning me, and most of the time it appeared Janice was trying to influence a new employee’s opinion of me immediately upon their arrival.

Cassandra and every other coworker within hearing distance of Janice’s apparent inappropriate comments became silent and appeared to be immediately uncomfortable with Janice’s (**Our Team Lead and direct supervisor**) behavior. I was humiliated again, embarrassed, and so distracted by Janice’s comments and behavior, I became flustered and was unable to check-in for my hearing timely. At that time it was **Cassandra Atkins (the brand new employee)** who encouraged me to calm down and focus so we could sign in to meet with the ALJ. **Cassandra** apologized to me for that apparent humiliation caused by Janice Nichols and offered to get me a drink of water to help. At the same time, Janice realized that I was late for the hearing due to everyone’s dramatic pause directly caused by her apparently outrageous behavior. Janice Nichols then began to send email messages to the administrative law judge (**Jessica Manis**) apparently expressing disrespectful language about me to the judge (as if) she was sure the ALJ would agree with her description of my character. However, the administrative law judge became noticeably upset and verbally expressed during the hearing call that she did not appreciate the supervisor’s (Janice Nichols’) comments about me and she specifically stated that Janice appeared to be the kind of person who “Just likes to Stir the Pot”. (**This conversation with the Administrative Law Judge (Jessica Manis) can be confirmed if the Court chooses to request my hearing recordings from the State of Indiana FSSA Office of Hearings and Appeals on that specific date April 16, 2016**). After Judge Manis made those specific comments about Janice Nichols’ actions towards me **Cassandra Atkins** nodded and expressly gave me the impression that the ALJ’s statements were confirmation that Janice was out of line.

- a. **Continued gossiping** beginning of ongoing discrimination and harassment : Slander, libel, retaliation, coercion

[10]

After that encounter with Janice Nichols, I filed my first harassment complaint as a permanent Xerox employee. I sent an email to the site **SBU manager Sandi-Shanklin-Owens** and requested that she

SECTION #8 STATEMENT OF CASE 5

“Please Help”. I informed Sandi that I needed her assistance to stop **my supervisor (Janice Nichols)** from making any further humiliating and derogatory comments about me and my intelligence. Sandi scheduled a meeting for the next evening close to the end of the work shift so she, Janice Nichols, Tara Richie, and I could have a sit-down conversation to discuss the issue. When I arrived at the meeting I was late. I had my email time set incorrectly in the system and the meeting was scheduled to start at 3:30pm and I had the time in my email scheduled for 2:30pm central time because I had not learned how to set the time zones. So when it was 2:30pm I was expecting to meet but the managers were still busy, so I returned to work and waited until they called me. When Sandi came to my desk to get me about five minutes after the meeting was supposed to start she informed me that I was late for a meeting that I had requested. I explained my email was set for the wrong time zone and I did not know how to reset it and I must have set the wrong time by accident. At that time Tara expressed her apparent disapproval of my explanation as if she thought I was not being honest.

Sandi began to do all of the talking. She first began with the advance that she had already spoken to Janice and **“they”** had come to the conclusion that it was all a misunderstanding. Sandi stated that I must have **“miss-heard”** or **“misunderstood”** what I heard because Janice would not make discriminatory comments about me, and what I heard was Janice and another coworker (**Breion Eskridge**) making private jokes with each other. Although, Breion was not a party to this meeting and during the incident in question Breion appeared to be just as shocked as the rest of us by Janice’s comments because he also paused and held an awkward silence. I also found these actions particularly unfair because Sandi Shanklin-Owens apparently did not speak to any of the other coworkers who were present at the time of the incident; not even Breion Eskridge. Sandi apparently just took Janice’s word for it.

[11]

Sandi then suggested if I continue to feel disrespected or discriminated against I do have the option to give up my position and take a pay cut by moving to a different department. I informed Sandi that Janice’s explanations do not explain that specific action nor does it explain all of her previous actions. I informed Sandi and Tara in that meeting that Janice was often rude and discriminatory against me. She continuously bad-mouths me to new and existing employees, trainees, and management. I informed Sandi that Janice’s attacks are frequent, unfair, and unmerited. I explained to Sandi about the numerous times that Janice had expressed contempt towards me openly on the production floor and in meetings with my coworkers; how she would speak in rude tones and make discriminatory remarks, such as, [she does not think I can handle the work, or if I don’t think I can handle the work then I “need to find another job”.] Or how Janice would withhold work and projects from me that could generate bonus income because she “didn’t feel” confident that I could do the work. Janice would also make a scene or spectacle every time I had a question or made a mistake. Janice would make discriminatory remarks about how long it took me to read and complete my assignments. At that time Janice protested stating that she never uses my name on the production floor. However, Janice did not say she doesn’t make disrespectful statements she specifically said she never used my name when she made any comments.

[12]

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Sandi then began to explain that maybe I should consider the fact that there are some things I am not able to do, and as a supervisor; it is Janice's job to discern what projects are suitable for each worker. Sandi went on to explain that her son is "**bad**" with money. Therefore, she does not allow him to handle financial management because he is not successful at managing his finances. I left that meeting feeling abused and misunderstood. I also felt that Sandi's explanations and defense of her supervisor's (**Janice nichols**) behaviors was extremely discriminatory and unfair. Sandi appeared to offer protection to Janice Nichols only and not me.

[13]

First **Sandi** asserted (**not suggested**) that I "miss-heard" what Janice said, or that I misunderstood what I heard. Sandi even went as far as to say she was "sure" that I misunderstood what Janice said because there is no way I could have heard anything from my seat; even though my seat was no more than 30 feet in distance away from Janice when she said it. I can also swear under oath that one of the characteristics of having ADHD and dyslexia is being easily distracted, and one of the reasons individuals with my condition are easily distracted is because we have heightened hearing capabilities at times. Which means in short, I can hear very precisely and from long distances away; much further than 30 feet depending on the surrounding noises.

Second, Sandi stated that because Janice is the supervisor it is her duty to assign work, and she assigns it as she feels necessary according to her judgment of what work is appropriate. However, what Sandi did not explain was how Janice Nichols was able to judge my performance concerning work she never gave me the opportunity to perform. Janice Nichols had simply decided that I was too slow for the work and therefore, she did not even offer it to me.

Thirdly, **Sandi Shanklin-Owens** then began to explain that my ability to perform certain tasks was comparable to her son (**whom I have never met[???]**) and his inadequacy with money. Sandi stated that because she could not trust her son with money, that is comparable to how Janice Nichols does not trust my ability to perform a task correctly. However, Janice did not allow me the opportunity to try to complete the tasks first before she made the decision to exempt me from the work, and Janice stated that her reasoning behind those decisions was because I could not communicate well and she "could tell" by the way I asked questions that I was "not ready" to be trusted with those kind of assignments. I found Janice's explanation to be specifically egregious because I had communicated to Janice in a meeting in 2015 that I believed I was dyslexic and that is why I had difficulty speaking and communicating and reading. I also informed Janice during that meeting that I was unable to get tested for dyslexia because I was unaware of any testing facilities in the state of Indiana. Therefore, I feel that Janice Nichols' actions give the appearance of conduct parallel to discriminatory practices because it appears that Janice took the information I communicated to her in confidence about my disadvantages and used it as a weapon to discriminate against me and deny my right to equal employment opportunities.

[14]

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Finally, after Sandi made a meritorious defense for Mrs. Janice Nichols, Sandi Shanklin-Owens then informed me that if I continue to “**feel**” discriminated against on the hearings team, (which is the highest paid position for an Eligibility Specialist) then I do have an option to surrender my position and pay raise, and at that time I can transfer to a lower paying eligibility position on another team. I became very upset and started to cry during this meeting because I felt the entire situation was unfair. I did not feel that I should be the individual inconvenience and demoted because I was not the aggressor of the confrontation and I was not violating any rules or policies; I was simply trying to save my job and support my family. Sandi’s speech suggested that there was no fair remedy for me. My only option seemed to be either I continue in my original specialized position with the added discrimination and embarrassment or surrender my position, take a pay cut, and move to a subordinate team and take a demotion. I did not feel that was an adequate resolution for the injured party. Especially since I maintained a 100% processing standard at a 98% ratio throughout my employment with the project. My numbers confirmed that Janice’s apparent discriminatory behavior was her own issue, not mine and certainly not the company’s at that time.

[15]

Even at the time of my termination for “**work performance issues**”, my production numbers remained at 100%. It appears that I was discriminated against during my employment with this employer simply because I could not read well and I did not want to be disrespected and humiliated because of it. Ja’van Smith turned a bad joke into five plus years of discriminatory practices, Harassment, retaliation, and ultimately the termination of my employment, and the continued discriminatory actions that followed the termination of my employment.

[16]

From 2016 to 2019 I continued to be ridiculed openly by supervisors, managers, and coworkers, always initiated by Janice Nichols, Bridget Hankins, Javan Smith and whichever coworkers and subordinates they could encourage and coerce to participate.

[17]

In 2015, Xerox merged into Conduent Human Services, our regional office was moved to a new location in downtown South Bend. After the move Janice and Bridget became increasingly hostile towards me, they began to submit write-ups against me weekly. Naming everything from I am typing too loud on my keyboard, I was accused of breathing in a disrespectful manner, I was accused of wearing too much cologne; I was accused of smelling like lemons; I was accused of attacking (Breion Eskridge) in the parking lot of the facility during a snowstorm (Only... “Breion did not make the complaint because he did not “Know” he was being attacked; another “supervising staff member” supposedly reported the incident, to save Breion from me “because” he did not know what happened”). Literally, I was accused of attacking someone who did not know they were being attacked. I was called off the floor, out of production and I received a written discipline for attacking a man who did not know he was attacked. In fact, the write-up simply says [**Paula behaved inappropriately towards a coworker**]. The written discipline does not even mention the name of the person I supposedly attacked. The only reason I know who I was accused of attacking is because Bridget verbally stated it was Breion Eskridge while we were

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in the disciplinary meeting and she was informing me that I had been written up (without her ever asking me if I had done it). Breion Eskridge and Bridget Hankins are allegedly relatives. Therefore, it appears obvious why Bridget did not want to add Breion's name to her apparently fraudulently procured disciplinary action against me. However, Bridget Hankins did not appear to mind using Breion Eskridge as a resource to her apparent discriminatory and improper employment practices.

[18]

When I asked who made the complaint, I was told that information could not be disclosed. Then I asked how I could be accused of attacking someone who did not know they were being attacked? And more importantly, how could I receive a written disciplinary action for an accusation that I assert is false without a proper investigation of the facts, without being given equal protection, and without even asking me if I did it? Bridget Hankins and Tara Richie explained to me that I was not required to be given the details of an "investigation" of complaints submitted against me. At that time I explained to **Tara Richie (the site's operations manager)** that enough was enough and if she and Sandi were going to continue to allow Janice, Bridget, and their coworkers and friends to continue to egregiously, unfairly, and illegally discriminate against me then I have no choice but to submit a complaint.

[19]

In January 2018 I submitted my second harassment complaint with the company as a Conduent employee. At that time **Corona Katzia** was the Human Resources Investigator assigned to my 2018 harassment case. Sandi Shanklin-Owens (the job site manager) and supervising staff members were alerted to my complaint immediately. I know this because they made no secret of it by discussing the citation and complaint in the office and production area. However, I did not receive a call or email from **Corona Katzia** until April 20th or 21st, 2018 and only after I made multiple attempts to contact her. It appeared clear to me that **Corona Katzia** was not interested in doing any real investigating of the issue. When **Corona** finally called me to discuss the matter it wasn't until after I initiated the contact with her on April 12, 2018 because Janice Nichols had called me out of production again to write me up for another fraudulent and egregious accusation.

[20]

After **Corona** had completed her "investigative interview" where she asked me to explain the circumstances and throughout the call she continued to explain that she was having phone trouble and was unable to hear pieces of my conversation. I explained the appearance of discriminatory criminal attacks and assaults were ongoing since 2013 starting in the training class. I explained that Bridget and Janice

SECTION #8 STATEMENT OF CASE 9

were friends at work along with Javan and they have all discriminated against me, by disrespectfully referring to me as stupid; making derogatory statements about me; and challenging everything I do at work to cause a nuisance; humiliating me in front of my coworkers; and painting me in a bad light for new employees and management. I explained to Corona that Janice and Bridget have given the impression that they are deliberately trying to get me fired by continuously submitting disciplinary actions against me and deliberately calling me out of production several times a month and sometimes a week. Even though they know how hard it is for me to keep up due to my disabilities.

[21]

Corona concluded the interview and stated that I would be getting something from her soon concerning the results of her investigation. I never heard from **Corona Katzia** again after that call. I finally got tired of waiting to hear from her and called the **Workplace Solutions Center (Conduent's human resource contact number)**. I was informed by a different human resource worker that **Corona** had canceled my complaint soon after she had spoken with me and she never bothered to inform me of the results of her apparent, "so-called investigation".

[22]

On March 14, 2018, I was sexually assaulted by Brittany Wray a **[WHITE WOMAN]**, another cohort of Janice and Bridget. Brittany Wray followed me in the bathroom on our 10am morning break and then proceeded to announce on the production floor that she was in the bathroom after me and I was the "funkiest shit she had ever smelled." and then she proceeded to tell all of the male and female employees (including her friends Bridget and Janice) on her breaks and lunch that my "pussy" stinks. I do not have a relationship outside of work with Ms. Brittany Wray. In fact, I have never met this woman before she began her work with the company. And at work I did not have conversations with Brittany Wray outside of the scope of our employment. Therefore, what Brittany did to me was completely egregious, outrageous, assaulting, and unacceptable. I did not deserve that behavior from anyone. Especially since there were at least fifty women in and out of that bathroom at the time of Brittany's assault; there were at least twelve women in the bathroom while we were still in there. Either using the restroom or waiting for their turn, and for Brittany to make such an assertion about my genitals is out right rape! I have never behaved so egregiously towards any of my coworkers in my life and I demand that same respect from others around me.

SPECIAL NOTE: After committing these actions **Brittany Wray [a WHITE WOMAN]** was **PROMOTED** by this employer (Conduent Human Services, LLC/ State of Indiana), **NOT PUNISHED** at ALL. Giving the appearance of conduct parallel to white supremacy and hate crimes. However, after I

SECTION #8 STATEMENT OF CASE 10

submitted my final harassment and sexual harassment complaint in February 2019 my employment was terminated on April 23rd, 2019.

[23]

All of these actions were explained to **(Mata, Khristian M)** in February 2019 [evidence labeled as **additional evidence 1**] when I again submitted another complaint because Bridget, and her friends appeared to be at it again. This time Bridget accused me of being rude to a coworker and after she pulled me out of crucial production time to explain that she was giving me Pricilla's work because I was rude to her. I again began to cry and informed her that I was fed up with their schemes and attacks, I informed her that the accusations were (again) false and I would be submitting another complaint of harassment. Bridget replied, "That's fine." (As if) She was not worried at all about my complaint, and based on the employer's actions after I filed that last complaint (taking away my few accommodations; modifying my employment assignment; terminating my harassment investigations without ever notifying me of the results or termination; wage discrimination; and ultimately terminating my employment) it appears Ms. Bridget Hankins was correct. She had nothing to worry about.

[24]

In February of 2019 I submitted my third complaint of harassment to the company as a Conduent employee. This time my case was assigned to **(Mata, Khristian M)**, another human resources investigator. I spent several months speaking with **(Mata, Khristian M)** three times over the course of two months. Again I was immediately aware that my complaint was submitted because of Bridget, Sandi, Breion, Brittany and other included coworkers who had no right to know about my private business. There were even times when Breion, Bridget, and Brittany discussed Brittany's sexual assault of me with other members of the staff openly on the production floor (as if) they were proud of it. All these actions appeared to be substantially egregious, malicious, and deliberate.

[25]

When I spoke to **(Mata, Khristian M)**, she behaved as if she was really attentive to my case. I began to trust that this time I would be heard and treated fairly. However, the hope was short lived because when I began to inform **(Mata, Khristian M)** that Bridget Hankins (my newly promoted supervisor), along with Breion Eskridge (Bridget's newly promoted relative), and Brittany Wray (their newly promoted friend and the coworker who also sexually assaulted me); were all conversing about my harassment case to other staff members (openly on the production floor) who had no right to my privacy. I informed her that the constant criminal attacks were having an affect on my health. At that time **(Mata, Khristian M)** simply

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stated to me that because I am already receiving **FMLA**, that if I were ever at work and felt that the harassing behaviors were too much, I could just use my **FMLA** time and go home or stay home. It was at this point, I made the decision to contact the **EEOC**. I understood that this employer would never treat me fairly or offer me equal employment rights, nor would they ever offer me equal protection. It appears that I was illegally discriminated against from the first moment of my employment when I was asked to read aloud in front of my peers and I could not do it.

[26]

I was shocked from the beginning that adults working in a state and federally funded office and contracted by the State of Indiana; in 2013, could appear to behave with such similar conduct parallel to childish, unprofessional, and cruel individuals. For adults to behave as though they think that it would be acceptable to make jokes about another adult because he or she cannot read. That kind of behavior is unacceptable in my opinion. I would not behave like that and I would never disrespect another person and or coworker. The entire duration of the employment and these employment dispute proceedings has been outrageously humiliating and degrading. This employer gave the appearance of conduct parallel to intentional negligence when they allowed their employees to discriminate against me because I am dyslexic and can not read very well; and harass and sexually assault me. The employer also gave the appearance of wrongfully terminating my employment without good cause. These actions give the appearance of discriminatory and improper employment practices.

- b. **Hate crimes** : sexual assault, corruption, improper interference with contract, coercion, collusion, discrimination, wrongful termination, white supremacy, breach of contract

[27]

On march 6, 2018, I was diagnosed with ADHD and Dyslexia. Until that time I was completely unaware of why I could not read and why I have the disadvantages that I do have. I immediately informed my employer Conduent Human Services of my new diagnosis and the recommended adequate accommodations that were put in place to help me be more successful at task completion and job performance as a whole. ADAAA approved my workplace accommodations and ordered them to be immediately implemented.

[28]

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My supervisors and management staff communicated to the ADAAA that they had provided the accommodations for me, which simply included a more quiet seating area to help deter distractions, noise canceling headphones to quiet any additional distractions and computer software. However, the computer software was never operational, it took the employer an entire year to download the software and when they did finally get it installed in January 2019, the site management would not allow me adequate time to learn the programming so I could apply it to my work. They even refused to allow me to take the software home so that I could practice it at my own time.

[29]

In fact, the employer not only denied my reasonable accommodations, but they also began taking them away once I submitted my final harassment complaint in February 2019. As seen in evidence, once I informed Bridget Hankins that I would not continue to be harassed and I will be submitting another complaint. Bridget then ordered the removal of my special seating. At one time in March of 2019 Bridget even demanded that I not use my computer modem with my accommodation programming attached.

According to the whistleblower policy my job assignment was not to be modified during the investigation. The employer appeared dishonest by trying to assert the defense that they had not received notification of my charge of discrimination until after the termination of my employment. However, I know for a fact that this employer knew of my charge of discrimination complaint filed with the EEOC prior to my termination date **[April 23, 2019]** because I heard them discussing it on the production floor in front of all of the other workers as they usually did daily. I was made aware of their knowledge of every one of my complaints because the managers and their friends (**Bridget Hankins, Ja'van Smith, Janice Nichols, Sandi Shanklin-Owens, Breion Eskridge, Rica Clay, Crystal Leonard, Daiquiri, Dawn Lovelady, Pam Suomela, Cassandra Atkins, Kim Easton, Shannon Williams, Brittany Wray, etc.**) all used that tactic to harass and bully me whenever I made a complaint (as if) they were hoping their actions would scare me into quitting my job or canceling my complaints.

IN OCTOBER 2020 I REPORTED A POLICY AND PRIVACY VIOLATION:

- a. Retaliation, collusion** (administrative law judge and state rep who replaced me gave the appearance of collusion when) : unauthorized denial of public benefits; denial of right to be heard; denial of requested FOIA FSSA public assistance file; denial of reconciliation, and denial past benefits owed

[30]

In March 2019 I began submitting my EEOC inquiries and I finally received. I faxed my initial statement to the EEOC office on April 1st, 2019. I was contacted by the EEOC investigator Willie Slater, around

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about the second week of April, 2019 I gave my initial interview over the phone and Mr. Slater informed me he would get started on my case. Mr. Slater and I attempted to make contact several times and we were unable to meet. On April 12, 2019 Mr. Slater informed me that he would be initiating my charge of discrimination complaint. After attempting to contact Mr. Slater several times with no luck, again I was made aware that the employer had received actual knowledge of my EEOC complaint as well because in normal fashion, Bridget Hankins, Breion Eskridge, and Brittany Wray were discussing the matter openly in the office and on the production floor with other members of the staff who had no right to my private information.

[31]

On April 17, 2019 began my vacation week from work and I was to return on April 23, 2019. On April 16, 2019, I received a visit from the district manager to inform me that she had made the decision of removing me from my regular work assignments due to a policy violation that I was not aware of. Charlotte Richie explained that I would not be losing any pay, my work assignments were only being modified until further notice because of the "seriousness" of my mistake. During the meeting with Charlotte Richie, our site district manager, she informed me that my harassment investigation was still ongoing and she needed me to explain my side of the dispute. I explained everything I explained to Corona and Matza including the latest current ongoing assaults. Charlotte reassured me that she was looking into my complaint. I informed **Charlotte Richie** that (**Mata, Khristian M**) the investigator had informed me just days before that she was unable to resolve my dispute and that Matza specifically stated that she would pass the complaint to Charlotte because of the seriousness of the complaint it must be handled by the company. I did also inform (**Mata, Khristian M**) that I did not trust the company to handle my dispute because of their previous actions. Mata assured me that Charlotte would be handling the issue for me from now on. However, while I was in the meeting with Charlotte on April 16, 2019, she expressed that she had spoken with **Mata** but she was unsure of who would be handling the complaint officially. I continued to explain every scenario to Charlotte except the sexual assault committed by Brittany Wray because Charlotte quickly affirmed that she was made aware of the incident as soon as I brought it up. She expressed that she had been made aware of that incident as well. Charlotte ended the meeting on April 16, 2019 by confirming she would be continuing the investigation into my case.

[32]

On April 17, 2019, I left for my vacation week and returned to work as scheduled on April 23, 2019. At the end of my shift I was informed by the management listed in every one of my complaints that my position had been terminated because of the accusation that I had tampered with evidence and that specific action was so egregious that I needed to be immediately terminated. However, adding evidence to an evidence pack before and after a hearing was something we were required to do because of the nature of our cases and their quick turnaround. In fact, we were frequently asked by the administrative law

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judges to insert evidence at the last minute to accommodate the judges request for additional information on the issue. However, I was informed that I had made an error that could not be repaired and therefore my position was terminated.

b. Interference with EEOC investigation

c. Respondeat Superior : THE STATE IS CONDUENT and CONDUENT IS ALSO GOVERNMENT COMMODITIES SECURITIES PAYMENTS promissory estoppel; unjustly enriched; improper employment practices; illegal violation of public policy; my total debt and damages; (Housing Authority, Unemployment, FSSA, Office of Hearings and Appeals; Judicial Disciplinary Commission; Indiana Legal Services; EEOC)

PROCEDURAL:

The fact that I asserted the argument of fraud and fraud on the court in the district court and in arbitration and in the appellate court process and neither of the judges or the courts would even acknowledge my complaint even when the defendant addressed the complaint themselves by calling it an absurdity and requesting further denial of my rights to be heard. [Doc #9 22-1376 at 3&4] These actions all give the appearance of conduct parallel to corruption and continued discriminatory practices.

District Court Case#: 3:19-cv-01061; AND 3:19-cv-01062

Arbitration Case#: 01-20-0015-5714

Appeals Case#: 22-1027, 22-1226, 22-1376

EEOC Charge Of Discrimination Case#: 470-2019-02056

The district court judge (Damon R. Leichty),

The arbitrator (Williams G. Hussmann),

The defendant (Conduent Human Services, LLC),

The defense attorneys (Stephen Scott, ESQ.; Jennifer Sims, ESQ.; Tasha Roberts, ESQ.; Tammy Witt;

Karuna Dave, ESQ.; Linda Mann paralegal), and

The circuit court judges (Michael S. Kanne, David F. Hamilton, & Amy J. St. Eve)

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- all have given the appearance of having engaged in conduct prejudicial to the effective and expeditious administration of the business of the courts, and have appeared to have violated the Indiana state constitution, the United States Constitution, and my civil and equal rights under the law by appearing to commit the following illegal crimes:

EMPLOYER ACTIONS:

The employer gave the appearance of corruption and collusion when they:

E. Conceded to improper and illegal employment practices:

When they:

1. Submitted the EEOC statement with false and missing information - [DE #34-1 at 87-94]
2. Admitted to terminating my employment prior to the conclusion of their harassment investigations and prior to the conclusion of the EEOC investigation having actual knowledge of the dispute. [DE #34-1 at 89, 93, 94]
3. Failing to conduct an adequate investigation of my harassment complaints [DE #89-94] [DE #42-6 at 18-19] [DE #38 audio evidence labeled meeting with Charlotte Richie dated 04/16/2019]
4. Failing to comply with the EEOC investigation timely and in good faith. [DE #34-1 at 34-36]
5. Submitting false statements of fact to investigators about the employees involved in my termination, the nature of my termination and similarly situated employees treated differently. [DE #34-1 at 91-94] [DE #42-5 at 38-41] [DE #42-12 at 85-89] [DE #42-11 at 28-29]

F. Failed to honor their employment and arbitration agreements:

When they:

1. Violated company policy by failing to prove me with equal employment opportunity. [DE #34-1 at 19-33]
2. Violated company policy by failing to provide my reasonable accommodations. [DE #34-1 at 19-33]
3. Violated company policy by failing to conduct a legitimate investigation of my harassment complaints. [DE #89-94] [DE #42-6 at 18-19] [DE #38 audio evidence labeled meeting with Charlotte Richie dated 04/16/2019]

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4. Violated company policy and the Indiana constitution by failing to compensate me for the services I provided. [DE #42-9]
5. Violated well established state and company policies by Illegally modifying my duties and terminating my employment during a discrimination, retaliation, harassment, and EEOC investigation. [DE #89-94] [DE #42-6 at 18-19] [DE #38 audio evidence labeled meeting with Charlotte Richie dated 04/16/2019] [DE #43-4 at 4-10] [DE #43-4 at 1-4] [DE #43-3 at 82-85]
6. Violated well established state and company policies and federal law by discriminating against me because of my legal disabilities. [DE #42-6 at 49-53] [DE #42-6 at 57-62] [DE #42-7 at 13-14] [DE #42-11 at 14-19]

DISPUTE RESOLUTION PROCESS:

EEOC:

G. Gave the appearance of: Intentionally delayed their responses and notifications to unfairly prejudice my case:

When they did:

1. The defendant appeared to delay their EEOC response intentionally to cause severe prejudice to the EEOC investigation that denied me due process of the state investigation of the complaint; also appeared to deliberately delayed submitting their EEOC Position Statement **fifty-five (55) days** after they were legally required to respond (**from 05/16/2019 to 06/15/2019**), by appearing to intentionally requesting three dilatory extensions and taking a fourth illegal extension without permission. [DE #34-1 at 34-36]
2. failing to answer the complaint by pleading evasive false statement and failing to plead facts; [Evidence listed in EEOC FOIA File @ DE #34]
3. Delayed notifying me or informing me of their intent to enforce or demand arbitration until **one-hundred and ninety-five (195) days** after they received my Right to Sue confirmation from the EEOC on **August 27, 2019**. [DE #34-1 at 9]
4. Delayed notifying me or informing me of their intent to enforce or demand arbitration until **one-hundred and eleven (111) days** after I initiated my complaint in federal court on **11/19/2019**. [DE #1]

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5. Delayed showing me or giving me a complete copy of their arbitration agreement until **four-hundred and forty-eight (448) days** after I signed their 2nd “Fake employment contract” on 12/18/2018. [DE #8-2 at 1, 26, 27, & 34]
6. Delayed showing me or giving me a copy of the complete arbitration contract until **one-thousand nine-hundred and fifty-eight (1958) days** after I signed the original and only legal employment contract on **October 29, 2014**. [DE #8-2 at 2]

Evidence regarding the situation was gathered and provided to two neutral third-party individuals within the project who had knowledge of the scope of work Williams was to have been completing while on the hearings team. Both individuals reviewed the evidence and agreed this offense should result in termination of employment. [EEOC FOIA File statement DE # 34-1 P. 93]

This statement is an example of conduct appearing parallel of bold-faced lies as seen in the evidence Bridget Hankins submitted the request to terminate my employment. Evidence listed [DE #42-5 at 38-41] **Bridget Hankins is specifically listed as an assailant in my multiple harassment complaints. According to the EEOC 612 Regulations and Compliance rules:**

(c) Request for Information From Respondent -

As indicated above, respondent's records are a valuable source of information in a discipline or discharge charge. The official who is responsible for the discharge or disciplinary action should also be questioned about the justification for charging party's discharge or discipline. The following information should be sought from the respondent when it is relevant to the allegation in the charge.

(2) The specific reason(s) why charging party was discharged or disciplined including the date, time of the discharge or disciplinary action, names of all persons involved, and each specific act for which the charging party was discharged or disciplined, as well as all witnesses to every event which led to the discharge or discipline;

(18) Whether charging party ever complained of receiving discriminatory treatment on the job

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ARBITRATION:

The arbitrator dismissed my case **ONLY** after I submitted my request for judicial intervention [DE #42-5 at 33-36] & [DE #43-5 at 55-60] & [22-1027 DE #22 at 101 - 102], the district court judge notified me that he had dismissed my case **ONLY** after I submitted my request for sanctions, default judgment and financial relief [DE #42-1 at 1-7] & [DE #43-5 at 2 & 3] & [22-1376 DE #5], and the seventh circuit court of appeals dismissed my appeal **ONLY** after I submitted my request for Declaratory Judgment [22-1027 DE #22 & #23].

a. Tolling and Technicalities:

- i. 1 -15. Further, the District Court found that Appellant's appeal "was not taken in good faith," thereby weighing against an extension. See Doc. 1-1, p. 35 of 42. Appellant has offered nothing to controvert this finding, much less to show that it constitutes an abuse of discretion." [Doc #9 22-1376 at 3]

ANSWER: This argument submitted by the defendant is also untrue. I submitted arguments and evidence of the district court's delay in notifying me by electronic email (the agreed upon mode of communication), and how that delay caused me to file the late appeal.

- ii. 2 - Doc. 4. Notwithstanding the absurdity and falsity of these allegations, they most certainly do not establish that the District Court abused its discretion in denying the Appellant's motion for extension. [Doc #9 22-1376 at 3&4]
- iii. 3 - 4 Appellee contends that Appellant is a vexatious litigant who should be enjoined from filing additional pleadings without leave of court. See Westefer v. Snyder, 00-162, 2011 WL 9135 at *3 (S.D. Ill. Jan. 1, 2011) ("The Seventh Circuit Court of Appeals has approved the use of filing restrictions against vexatious litigants."). Moreover, F.R.A.P. 38 provides, "[i]f a court of appeals determines that an appeal is frivolous, it may, after a separately filed motion or notice from the court and reasonable opportunity to respond, award just damages and single or double costs to the appellee." [Doc #9 22-1376 at 4]

ANSWER: Here the defendant asserts the argument that the district court found my appeal frivolous and is suggesting that the appellate court award the defendant damages because my appeal is "frivolous". The definition of frivolous is:

- Of minimal importance; legally worthless.

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- A frivolous suit is one without any legal merit. In some cases, such an action might be brought in bad faith for the purpose of harassing the defendant. In such a case, the individual bringing the frivolous suit might be liable for damages for Malicious Prosecution.
- A frivolous appeal is one that is completely lacking merit, since no reviewable question has been raised therein.
- Frivolous
adj. referring to a legal move in a lawsuit clearly intended merely to harass, delay, or embarrass the opposition.

As seen from the meaning of the word frivolous, by asserting that my appeal is frivolous the district court appears to enforce that my case and my appeal are “of minimal importance”; and is “legally worthless”; “without any legal merit”; and “brought in bad faith for the purpose of harassing the defendant”. Because the district court has “actual knowledge” of the nature of my original complaint and that my case and complaints contain claims of federal questions, employment discrimination, disability discrimination, age and wage discrimination, sexual harassment, constitutional violations, and wrongful termination; and having received a preponderance of evidence to support the charges and claims, this specific language from the district court also suggests parallel conduct of corruption and collusion. Because how can the district court come to such a conclusion having received so much evidence?

The UAA enforces that an employer who causes unnecessary delays to prejudice the other party’s case and force the party into waiving their rights, then asserts an argument of time statutes is not in good faith. Therefore, that employer has given the appearance of defrauding the arbitration process and those actions are grounds for vacatur of any arbitration award.

The district court did not compel the arbitration instead it decided to dismiss my case without prejudice, knowingly advising me in a previous order as a lay person that I needed to read the federal rules and procedures, however neglecting that in my pleadings I have made it clear that I was not informed of the arbitration order. I also was not given any explanation about what an arbitration was or its purpose. I did not have a chance to read or understand the rules and procedures of the arbitration process. I was not given the required counseling informing me of the arbitration process at all, The only documents pertaining to an arbitration I had seen were the four pages attached the end of the defendant’s employment contract, that I saw once for about five minutes in December of 2018

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*- I explained that I have a reading disability and the defendant refused to provide the required ADA accommodations required for me to perform my required job duties including but not limited to specific reading software necessary for my reading comprehension. I also explained how the defendant deliberately violated employment policy and practices concerning wage, age, and disability discrimination statutes, and OSHA safety laws. Unfortunately - even with the preponderance of clear and convincing evidence I had provided corresponding to the claims and the arguments I had presented, the district court chose to abuse its discretion and declare the federal court does not have subject matter jurisdiction over this case. {and that I was restricted to a strict time limit to proceed in arbitration or my claims would face additional challenges of time barred due to limitations.}

And now over two years later I am still fighting for my life in a case against the same fraudulent and egregious employer, performing the same illegal dilatory wanton and vexatious litigation practices that I reported over two years ago. However, now I am much worse for wear. I am many thousands in debt, my health has not improved but has deteriorated due to stress and lack of finances to support the necessary medical care; my family is in financial ruin; I continue to be egregiously harassed, discriminated against, and retaliated against by the defendant and their staff (eg. my state and government assistance has been discontinued several times for multiple months at a time causing direct harm to my health, my daughter's health, and my mother's health).

*Due to and in direct relation to the defendant's previous and continued acts of negligence, harassment, and discrimination I have been sexually assaulted at the job site, my dog needed emergency surgery in June 2019 and because I had no job, no resources and no income my dog died. And because my vehicle was repossessed due to the loss of my employment and income; I was unable to drive to Kalamazoo Michigan to the cancer hospital and say goodbye to my father before he passed away 05/14/2020.

*I have suffered enough at the hands of this negligent employer and its vexatious and wanton management and staff. I demand that my constitutional rights NOT be violated any further and I demand to be heard and protected under the law and the constitution which are my 5th and 14th amendment rights.

*I had no clue of what to do next, no money for legal representation, and no idea of what the arbitration process was, how to start it, or even who to call to begin the process. The district court severely prejudiced my case with this order, {and knowing that I was restricted to a strict time limit to proceed in arbitration or my claims would face additional challenges of being time barred due to limitations.} instead of accommodating me as a poor person (which is the law according to Indian's constitution) it legally disabled me even further.

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SPECIAL ATTENTION MATTERS: I would like to draw your attention to all of the audio evidence submitted throughout these dispute resolution and complaint proceedings. I have submitted four compact disks with conferences of the complaint actions **[listed in district court audio evidence]**

DISTRICT COURT ACTIONS:

I submitted an appeal to District Court, and an appeal to the Circuit Court, and having received all of the clear and convincing evidence **[DE #1, #8, #14, #18, #20, #25, #34, #35, #36, #38, #39, #42, #43, #62, (22-1027#5, #10, #11, #16, & #22/with audio evidence attached), (22-1226 #4, #6, #8, #11, & #12), (22-1376 #4 & #12)]**, and having access to all of the dockets and all of the Pleadings in arbitration **[DE #43-3 at 31-46] & [DE #42-5 at 35-36] [DE #43-5 at 7-49] & [DE #43-5 at 50] & [DE #43-3 at 67-75]**; the seventh circuit court again decided to ignore all of the evidence, my pleading of fraud on the court, my requests for declaratory judgment, my requests for default judgment and decided to dismiss my case Illegally.

According to the district court judge (**Damon R. Leichty**) who has noted my case and request for **consideration as frivolous and moot**, because he has decided not to hear my arguments then every other judge should follow his illegal practices and deny my rights to be heard as well. "Further, and significantly, the court already concluded that Ms. Williams' appeal was not taken in good faith, which likewise weighs against an extension [ECF 48]."**[DE #53 at 2]**

- a. B. Except as provide for in 4.C(iv) of the Plan, in the event a Party initiates judicial proceedings rather than proceeding under the DRP and thereafter is ordered by the court or the Parties agree to submit the Dispute to arbitration under the DRP, the Party must initiate proceedings under the DRP within ninety (90) days of entry of the court's order (or date of the agreement) or the disposition of any immediate appeal of such order, or within the remaining time allowed by applicable law for the filing of a complaint in a court of competent jurisdiction based on the event which gives rise to the Dispute, whichever is longer. **[AAA Respondent Pleading Submitted 06/11/2021:]**

The first four compact audio disks were submitted during the dispute resolution and lower court case litigations; providing clear and convincing evidence of the truth of the legitimacy of the claims asserted. However, due to the delayed notification actions (**12/20/2021**) of the district court clerk's office (after they had "actual knowledge" of my reading disabilities and had already received "actual knowledge" of my notification to the arbitrator of my reading disabilities and my requests for the specific reasonable accommodations [of not less than thirty days to file pleadings]); and the abuse of discretion caused by the district court judge appeared to be inappropriate dismissal of any and all of my motions requesting

SECTION #8 STATEMENT OF CASE 22

judicial review; injunctive relief; and sanctions. My appeal time was severely prejudiced and my appeal was submitted three days late.

The district court judge dismissed my request for appeal for being late (due to the delay caused by the actions of the district court clerk), and began dismissing any and all motions submitted concerning and supporting my request for appeal. These actions appear to be substantially egregious and give the impression of corruption and that the district court is in collusion with the defendant for the following reasons:

- a. The district court judge dismissed the first complaint and action in my case in February 2020. I submitted two complaints to the district court, one including myself and the employer, and the other including the specific managers responsible for the actions that took place on the day my employment was terminated. The district court judge dismissed my other complaint case based on his interpretation of pleading defenses. Before the defendant's could make an argument the district court judge had pleaded a defense for the defendants and dismissed my complaint based on his own asserted defense and the judgment he enforced supporting his defense.
- b. I submitted an in forma pauperis request and the district court did not accommodate me completely as I requested; nor did it grant my in forma pauperis request pursuant to the Indiana Constitution.
- c. I also submitted a request for emergency relief and again, the district court only partially provided the accommodations I requested, and did not honor my request for reasonable accommodation based on the Indiana Constitution statute.
- d. I REQUESTED DEFAULT JUDGMENTS
- e. I REQUESTED DECLARATORY JUDGMENT
- f. I REQUESTED A STAY OF ARBITRATION
- g. I REQUESTED THAT MY CASE BE CONSIDERED "INDIVIDUALLY" OF OTHER SIMILARLY SITUATED CASES AND CLAIMS
- h. I REQUESTED JUDICIAL REVIEW
- i. I REQUESTED INJUNCTIVE RELIEF

SECTION #8 STATEMENT OF CASE 23

- j. I REQUESTED EMERGENCY RELIEF AND RESTRAINING ORDERS TO PROTECT MINE AND MY FAMILY'S HEALTH IN A PUBLIC CRISIS (PANDEMIC)
- k. I REQUESTED AN APPEAL
- l. I REQUESTED AN EXTENSION
- m. I REQUESTED ADDITIONAL APPEALS
- n. I REQUESTED ADDITIONAL IN FORMA PAUPERIS ACCOMMODATIONS
- o. **Any and every request I made to the district court was dismissed/ denied/ or only partially granted pursuant to the Indiana Constitution. It appears that the district court judge and staff went out of its way to deliberately enlarge the defendant's rights and illegally prejudice my rights.** As a disabled, indigent, pro se litigant; all these actions severely prejudiced my rights, my case, and gave the appearance of corruption and collusion and conduct parallel to obstruction and tampering.
- p. HOWEVER, just the opposite, the district court made substantial efforts to accommodate the trillion dollar employer by:
 - i. Awarding them an extension of their filing time for pleadings;
 - ii. pleading defenses for the defendants before they have the opportunity to appear;
 - iii. awarding the defendant with injunctions **[arbitration enforcement]**
 - iv. and unfair dismissals of my claims and cases based on legal technicalities instead of evidence and actual knowledge of the facts that speak to the truth of the dispute.
 - v. These actions gave the appearance that the district court's apparent negligence of its duty to protect my rights as the [injured party], was ignored and the complete opposite attention and concern for the defendant and any inconveniences they asserted was accommodated timely and effectively as the defendant requested. These actions also give the appearance of conduct parallel to tampering with the fair administration of justice; corruption; and obstruction.

- 1. **Violated the constitution of Indiana and the United States constitutional, civil, and equal rights:**

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- **Conduct Parallel to the Appearance of:** denying my right to proceed in forma pauperis [DE #2, #26, #37, #48, #53, #59, (22-1027 #12, #13, #23); (22-1226 #13, #16); and (22-1376 #10)]
- **Conduct Parallel to the Appearance of:** denying my rights to equal protection under the law by dismissing my motions [DE #24, #26, #29, #37, #48, #53, #59, (22-1027 #23)]
- **Conduct Parallel to the Appearance of:** denying my right to be heard because they denied my requests for relief [DE #24, #26, #29, #37, #48, #53, #59, (22-1027 #23)] & [DE #43-3 at 31-46] & [DE #42-5 at 33-36]

B. Denied my request for preliminary injunctions, judicial review, restraining orders and judicial intervention of arbitration awards and process:

- **Conduct Parallel to the Appearance of:** Denying my right to judicial intervention [DE #37, #48, #53, #59, (#42-5 at 33-36), (22-1027 #23)]
- **Conduct Parallel to the Appearance of:** Denying my right to injunctive relief [DE #37, #48, #53, #59, (#42-5 at 33-36), (22-1027 #23)]
- **Conduct Parallel to the Appearance of:** Denying my right to request for restraining orders [DE #37, #48, #53, #59, (#42-5 at 33-36), (22-1027 #23)]

D. Conduct Parallel to the Appearance of: Denied me equal protection and due process of the law:

When they:

1. Denied my request for judicial intervention, including but not limited to financial relief, emergency, and necessary restraining orders. [DE #37]
2. **Conduct Parallel to the Appearance of:** Denial of my request for reasonable accommodations [DE #43 -3 & #43-4] [DE #26,37, 48, 53, 59] [arbitration orders dated 05/27/2021, 08/27/2021, 12/16/2021, & conference call orders] [DE #43-3 at 31-46] & [DE #42-5 at 35-36]
3. **Conduct Parallel to the Appearance of:** Denial of my right to be heard [DE #43 -3 & #43-4] [DE #26,37, 48, 53, 59] [arbitration orders dated 05/27/2021, 08/27/2021, 12/16/2021, & conference call orders] [DE #43-3 at 31-46] & [DE #42-5 at 35-36]
4. **Conduct Parallel to the Appearance of:** Denial of my appeal as of right [DE #37, #48, #53, #59, (22-1027 #23), (22-1226 #16), (22-1376 #10)]

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**5. Conduct Parallel to the Appearance of: Denial of my evidence [DE #43-3 at 31-46]
[DE #48, #37, #26, #53, #59] [22-1027 DE #22, #6]**

APPELLATE COURT ACTIONS:

- ❖ “16. Rather, without citing to any evidence, Appellant arbitrarily alleges that the District Court conspired with Appellee to violate her civil and constitutional rights and that the Defendant is “guilty.”⁴ Doc. 4. Notwithstanding the absurdity and falsity of these allegations, they most certainly do not establish that the District Court abused its discretion in denying the Appellant’s motion for extension.” [22-1376 DE #9 at 3&4]

Here the defendant’s attorneys assert that I did not “cite” any evidence in my argument. This statement also appears to be evasive. The defense appeared to assert this statement in such a way to suggest that there was no evidence submitted corresponding to my advanced allegations of corruption and conspiracy. I am asserting as fact that for every argument I advanced there was clear and convincing evidence of each assertion to that specific argument.

According to the American Bar Association does a meritorious defense include fabrication of the truth and misrepresentation of the facts of the complaint?

C. gave the appearance of corruption, collusion, conspiracy, fraud on the court, obstruction of justice and tampering with the administration of justice:

Conduct Parallel to the Appearance of: Refusing to hear my arguments (denied my absolute right to be heard)[DE #1, #8, #14, #18, #20, #25, #34, #35, #36, #38, #39, #42, #43, #62, (22-1027#5, #10, #11, #16, & #22/with audio evidence attached), (22-1226 #4, #6, #8, #11, & #12), (22-1376 #4 & #12)]

Conduct Parallel to the Appearance of: Dilatory practices to delay proceedings spelled out in the requests for injunctive relief. [DE #18] [DE #34-1 at 34-36]

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Conduct Parallel to the Appearance of: Enforced excessive pleadings [DE #17 #29, #37, #48, #53, #59, (22-1027 #15, #4, #2), (22-1376 #2), (22-1226 #2)]

Conduct Parallel to the Appearance of: Denial of and threatening the denial of my right to be heard [DE #43 -3 & #43-4] [DE #26,37, 48, 53, 59] [arbitration orders dated 05/27/2021, 08/27/2021, 12/16/2021, & conference call orders] [DE #43-3 at 31-46] & [DE #42-5 at 35-36]

Conduct Parallel to the Appearance of: Submitted pleadings and orders containing bold-faced lies [DE #43-5 at 7-49], [DE #43-3 at 31-46] & [DE #42-5 at 35-36] & [DE #26,37, 48, 53, 59] & [DE #34-1 at 87-94] [DE #18].

Conduct Parallel to the Appearance of: Submitted false pleadings under oath [DE #34-1 at 87-94] [DE #43-5 at 7-49] [DE #18]

Conduct Parallel to the Appearance of: Vexatious and wanton practices to enlarge the defendant's rights [DE #43-5 at 7-49] [DE #18]

CONDUCT PARALLEL TO BOLD-FACED LIES: Misrepresentation and Misconduct:

Here are a few arguments that the defendant has advanced that give the appearance of **conduct parallel** to asserting inappropriate arguments of **BOLD-FACED LIES** as false facts under oath:

NOT A GOVERNMENT ENTITY:

Here the defendant has admitted to being state and government affiliated, and then the defendant proceeded to lie about their status throughout the entire arbitration and district court process.

The defendant's attorneys continued to consistently deny that Conduent is a government entity (until they didn't: 1 Conduent Human Services, LLC has recently merged into Conduent State & Local

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Solutions, Inc.” [Doc #9 22-1376 at 1]), and the district court judge also made a compelling argument when he pleaded for the defendant in his [DE#53 02/09/2022] denial of my extension to file an appeal contending that my appeal was frivolous and without merit. The district court judge (DDDD) also stated that I was “attempting to recast” the defendant as a government entity.

According to the Privacy Protection Act of 1974:

- 5 U.S.C. § 552a(m)(1)
- (m) Government contractors (1) When an agency provides by a contract for the operation by or on behalf of the agency of a system of records to accomplish an agency function, the agency shall, consistent with its authority, cause the requirements of this section to be applied to such system. For purposes of subsection (i) of this section any such contractor and any employee of such contractor, if such contract is agreed to on or after the effective date of this section, shall be considered to be an employee of an agency.

Therefore, according to the statute and my original complaint argument asserted 11/19/2019 [DE#1 (11/19/2019)], it appears that my argument was correct and that the defendant and the district court judge (DDDD) were in collusion together with their lies concerning this specific argument.

“Conduent Human Services, LLC is a wholly owned subsidiary of **Conduent State & Local Solutions, Inc. Conduent State & Local Solutions, Inc. is a wholly owned subsidiary of Conduent Business Services, LLC.** Conduent Business Services, LLC is a wholly owned subsidiary of Conduent Incorporated. Conduent Incorporated is a publicly traded company that has no parent corporation, not is there any parent company that owns 10% or more of its stock. Respectfully submitted this the 1st day of April 2020. COUNSEL FOR DEFENDANT /s/ Stephen L. Scott
STEPHEN L. SCOTT, ESQ. (Admitted PHV)
THE KULLMAN FIRM” [DE #15]
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“Conduent is not a government entity. Instead, it is a limited liability corporation and a wholly owned subsidiary of Conduent Business Services, LLC [ECF 34-1 at 87]. Conduent provides “diversified business process services including transaction processing, automation, analytics, and constituent experience to both government and commercial clients” [ECF 34-1 at 88].” [DE #53 at 3]

“1 Conduent Human Services, LLC has recently merged into Conduent State & Local Solutions, Inc.” [Doc #9 22-1376 at 1] (even after the defendant concedes to fact they are

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a government entity; they appeared to be unable to admit to it without telling another **BOLD-FACED LIE**. Conduent did not recently merge into Conduent State and Local Solutions, Inc. as seen in evidence already submitted [DE #15] & [Doc #16 at 8] Conduent has been State & Local Solutions, Inc. since 2019 at least.

F. Claimant's Whistleblower Protection Act, Privacy Protection Act, and EEO Act of 1972 Claims Should Be Dismissed.

In her judicial Complaint, Claimant also purports to assert employment discrimination claims under the Whistleblower Protection Act of 1989, 5 U.S.C. § 2302(b)(8)-(9), the Privacy Protection Act of 1974, and the EEO Act of 1972.

Each claim should be dismissed, as those statutes are not applicable to Claimant. **Submitted 06/11/2021:**

G. Claimant's HIPAA Claim Should Be Dismissed.

In her judicial Complaint, Claimant also attempts to assert a claim against Respondent under the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Generally speaking, HIPAA protects the use and disclosure of Protected Health Information, which includes an individual's medical information as well as personal identifiers, such as name, address, date of birth and Social Security Number. **Submitted 06/11/2021:**

E. The HIPAA Claim Must Be Dismissed...

Claimant does not assert in the Complaint that Conduent is a covered entity, nor does she respond to Conduent's argument that it is not a covered entity. She merely alleges in her response that her privacy was violated. (Claimant's Response, p. 9).

Because Conduent is not a covered entity under the statute under the circumstances surrounding Claimant's employment and assignment, Claimant cannot maintain a claim under HIPAA. Submitted 08/23/2021:

The Privacy Protection Act of 1974 protects the confidentiality of individuals' records in possession of the federal government and provides for civil actions only against federal agencies. See 5 U.S.C. 552a-(g)(1)-(5).

Respondent, however, is not a federal agency, and Claimant does not allege that Respondent is a federal agency. Claimant also does not allege any facts tending to suggest a violation of this statute. Accordingly, this claim is also due to be dismissed.

Submitted 06/11/2021:

Actions that appear as parallel conduct of HATE CRIMES / BIASED CRIMES/ White Supremacy:

NEW, CURRENT, AND ADDITIONAL STATE PRACTICES: Evidence listed @ Exhibit B, Exhibit C, Exhibit D and Requests for Help.

a. New Crimes Against My Mother and Family:

I have included in NEW EVIDENCE the Family and Social Service Administration (FSSA) administrative hearing that was completed 04/04/2022 to show the ONGOING harassment that my family and I continue to be subjected to at the hands of the defendant and their employees and affiliates.

[EXHIBIT B - AUDIO evidence from hearing call] at 39:00 minutes in the call you can hear the state representative explain why she denied my reasonable accommodations. At 5 minutes and 39 seconds into the call you can hear the state representative threaten to deprive my mother of her benefits by rescheduling the hearing if she doesn't like my attitude.

The district court abused its discretion because under the act that governs arbitration I am entitled to judicial review of all unfair, corrupt, arbitration orders procured by fraud and misconduct. Therefore, the district court's deliberate decision to deny my motions for EMERGENCY injunctive relief obviously without reading my arguments or even considering the merits and grounds for the request was an illegal, intentional, violation of my right to be heard and protected under the constitution and an abuse of the court's discretion. And in these actions the district court not only allowed the defendant to continue to harm me with their retaliatory and discriminatory actions, the court literally gave the defendant permission to continue their criminal activity which has been continuous even to this very date.

ILLEGALITY: Actions that appeared illegal in nature and intent.

i. Threats of deprivation:

Currently and in like manner, the defendant's employees have begun again. Now the same St. Joseph County Employees are harassing my disabled and elderly mother. The St. Joseph County Office management has discontinued my mother's food stamp benefits without cause because she resides in the home with me. The St. Joseph County management now refuses to correct my mother's case and she has been deprived of her

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benefits since December 2021. She is now over 120 days without her necessary food assistance “because they did not receive her income information”. She has completed applications, interviews, submitted all necessary documents and administrative hearing adjudications and her case still lies in limbo for no apparent reason at all.

As my mother’s authorized representative, I attended the administrative hearing on her behalf. I informed the state representative that I submitted all available documentation and requested that the state assist us in obtaining any other information missing. I then informed the state worker that I had requested a new appeal on at least two other occasions. However, the state worker again did not have the evidence in the packet and was During the hearing the state representative was rude, disrespectful and argumentative and she made clear threats on record and under oath stating that she would specifically deprive my mother of her benefits by “Ending the call and reschedule the hearing” to make my mother wait longer for her benefits if she does not like my attitude. The state representative then proceeded to say that the St. Joseph County office management has refused to assist my mother in obtaining any information to correct her case and benefits solely because they did not like the way I requested the assistance. I then informed the state worker that their actions were discriminatory and against ADA policy and laws. **[Exhibit B - Audio from 04/07/2022 FSSA Administrative Hearing Call]**

But for the defendant’s negligent and contributory actions, my family and I have suffered tremendous and unnecessary hardship and financial destitution at the defendant’s pleasure and without regard to my health and quality of life.

i.e., - My food stamp benefits were discontinued in July 2020 due to “agency error” and remained discontinued for more than 90 days. I filed an appeal and the FSSA administrative law judge (Jessica Manis) conducted the hearing. During the hearing the state representative (Crystal Leonard) entered false testimony under oath that the state had sent me documents that she could not present at the time of the hearing.

I advanced my argument that the state did not have evidence of the documents she was referencing listed in my packet (because they did not exist) the state representative (Crystal Leonard) simply stated “she didn’t know why the documents were not in her evidence packet. Despite the missing evidence (the sole reason for the state's discontinuance of my benefits) the administrative law judge found in favor of the state with NO EVIDENCE to support her findings in her possession and no evidence of the

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documents were given to me as the program recipient. In her decision (judge Manis) simply omitted any reference to the missing information and reported that I was over the income standard for the program, and that was false because I had no income. When I received the decision from the DFR, I promptly requested an Agency Review of the judges orders and that decision was also awarded to the state with no explanation and NO EVIDENCE to support the decision.

The defendant's employees refused to correct the errors. And when I requested a copy of the hearing call (which is also my right as a recipient) the St. Joseph County office refused to provide it to me. After more than 90 days of me fighting to correct my case during a pandemic, the St. Joseph County Office still forced me to submit a whole new application for my food stamp benefits and has not reimbursed me for the three months of destitution they caused my family.

The state of indiana workers gave the appearance of corruption and collusion when they:

- a. When the state discontinued my SNAP federally funded food benefits program during an emergency public crisis without good cause; refused to reinstate my benefits when I filed an appeal and agency review; therefore, the defendant appeared in collusion, coercion, conspiracy, and corruption with other members of affiliated state agencies(Jessica Manis - Office of Hearings and Appeals Administrative Law Judge) / complaints commission / attorney general's office.
- b. When the housing authority discontinued my mother's federally funded section 8 benefits; caused her to be homeless for a total nine months (due to the property manager's apparent acts of illegal housing discrimination practices) without honoring their duty of strict liability to protect my mother's fundamental rights of equal and fair housing.
- c. Refused to offer me legal assistance, the legal aid office did not and would not even offer me any instructions on what court to submit my appeal to next after my appeal case had been dismissed (stating their legal aid office could not afford to assist me in my complaint to the Supreme Court of the United States. Even though I made it clear that the only essential help I was desperately in need of was just the instructions of what court to submit the appeal myself.) The legal aid agency refused to assist me with my case and refused to inform me of the correct court of jurisdiction using the argument of "unauthorized practice of law".
- d. When the unemployment unfairly discontinued my unemployment pandemic benefits and placed a penalty on my account for no good cause. Forcing me to file and refile the same

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documents multiple times; forcing me to file and refile the same vouchers multiple times; and refusing to respond to any and all requests for verification my case status, and refusing to honor or respond to my request for my FOIA file, and refusing to pay all pandemic funds and allotments after depriving me and my household of benefits for more than two years after forcing me to complete multiple applications for my legally entitled benefit and even after finding that I am entitled to the benefits; the defendant and their affiliated employees and state agencies still refuse to release my family's legally entitled unemployment pandemic benefits.

- e. When the judicial complaint commission refused to address my submitted complaints stating they can not discipline or even investigate the defendant's attorneys. In fact the only attorney the Indiana state Judicial Commission agreed to investigate was the only African American attorney with the least involvement in the case actions and the false facts submitted by the defendant.
- f. When the appellate court / district court / and arbitration all refused to acknowledge my evidence and my arguments of fraud.
- g. When the arbitrator / district court / and appellate court all refused to grant my requests to file in forma pauperis; refused my declaratory judgment requests / requests for injunctive relief / and request for emergency protections due to public crisis and violated rights.
- h. When the arbitrator / district court / appellate court dismissed my claims for inappropriate pleading defenses and statements that my case was moot; frivolous; without merit; and that I had pleaded no facts.
- i. When the appellate court; district court; and arbitrator all forced me to plead and re-plead motions requesting accommodations that they all refused to award.
- j. When the lower court tribunal allowed the defendant to fraudulently procure awards pursuant to inappropriate applications of laws and vexatious and dilatory pleading defenses.

A. Gives the appearance of Violated state policies:

- **Conduct Parallel to the Appearance of:** allowing their employees who are my former co-workers and managers (and directly involved in the actions and complaints of this dispute) working in the same county offices to access, manage, and control my state benefits. [DE #35-2 at 12-28] & [22-1027 DE #22 at 23-27]

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- **Conduct Parallel to the Appearance of:** illegally discontinuing my state benefits to enlarge the defendant's rights and deprive my family of needed assistance to force an arbitration settlement. [DE #35-2 at 12-28] & [22-1027 DE #22 at 23-27]
- **Conduct Parallel to the Appearance of:** illegally terminating my employment due to my harassment, discrimination, and retaliation complaints. [DE #34-1 at 89, 93, & 94]

THE STATE OF INDIANA'S PUBLIC ASSISTANCE AGENCIES AND THE JUDICIAL SYSTEM

- appear to operate on a **“don't ask don't tell”** ideology adopted from repealed military statute [10 U.S.C. 654(d)(1)(2)] and a **“ask and you shall NOT receive”** ideology. Meaning that Indiana appears to behave as if an individual is unaware of any laws or privileges that will assist that individual in achieving any fundamental or absolute rights, the state of Indiana and its courts are not inclined to assist you in acquiring the information you need to be successful. In fact, the Indiana courts appear to go through significant measures to withhold and prejudice the fundamental rights of the injured party by simply enforcing the Unauthorized Practice of Law statute (37 CFR 11.505 (up to date as of 8/12/2022)). I have also observed that, if by some chance an individual is made aware of a policy, statute, or law that will help their individual case survive a dismissal or denial, or help an individual succeed on any other appeal; policy; or right according to law, the state of Indiana and its courts have made it nearly impossible for an individual to obtain that specific privilege or right. The state of Indiana's unemployment policy confirms Indiana's state of mind concerning the rights of the public concerning entitlement to benefits

= [10 U.S.C. 654(d)(1)(2) - don't ask don't tell policy]
(Pub. L. 103-160, div. A, title V, §571(a)(1), Nov. 30, 1993, 107 Stat. 1670.)

When the Indiana courts allow a defendant to assert **joinder defenses** and **statute of limitations defenses**, and pleading defenses that have no relation to the truth and facts of the actual complaint, it appears that Indiana is also advancing the ideology of **“Don't speak now”** AND **“forever hold your peace”**. By enforcing that a plaintiff separate claims or change venues (because of a joinder defense asserted) without considering the potential prejudice to the plaintiff's case based on court costs and time tolling (due to the statute of limitations); courts that employ such practices give the appearance of enlarging the rights of the defendant while severely prejudicing the rights of the injured plaintiff to the detriment of the plaintiff's complaint.

[Stable URL: <https://www.jstor.org/stable/10.7249/mg1056osd.10> - DON'T ASK DON'T TELL ARTICLE]

REASON WRIT FOR CERTIORARI SHOULD BE GRANTED:

The Declaration Of Independence provides:

"We hold these Truths to be self-evident, that all Men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty, and the pursuit of happiness—That to secure these Rights, Governments are instituted among Men, deriving their just Powers from the Consent of the Governed, that whenever any Form of Government becomes destructive of these ends, it is the Right of the People to alter or to abolish it, and to institute new Government, laying its Foundation on such Principles, and organizing its Powers in such Form, as to them shall seem most likely to affect their Safety and happiness. Prudence, indeed, will dictate that Governments long established should not be changed for light and transient Causes; and accordingly all experience hath shewn, that Mankind are more disposed to suffer, while evils are sufferable, than to right themselves by abolishing the Forms to which they are accustomed. But when a long Train of Abuses and Usurpations, pursuing invariably the same Object, evinces a design to reduce them under absolute Despotism, it is their Right, it is their Duty, to throw off such Government, and to provide new Guards for their future Security. Such has been the patient Sufferance of these Colonies; and such is now the Necessity which constrains them to alter their former Systems of Government."

The urgency and necessity of the argument of law versus fundamental and constitutional rights are the core and **SOLE PURPOSE** of this dispute/complaint:

I believe that it is a violation of constitutional rights for any individual or employer in any state, any state agency and any lower court tribunal who has taken an oath to protect and server, and to protect the fundamental rights of every individual citizen of the United States of America and having taken such oaths; those who have been entrusted with protecting the safety of societies fundamental rights; If they (the defendants) being found guilty of having chosen to deliberately and intentionally violate their absolute duty of care, those individuals, employers, employees, affiliates, agencies, and lower court tribunals and staff should not, and could not be exempt from absolute responsibility up to and including financial responsibility and criminal prosecution to the Ends of Justice and until the **INJURED PARTY** is made whole.

The actions in this dispute cover contract law; arbitration law; pleading defenses; including time tolling and statute of limitation defenses; joinder defenses; jurisdiction; unauthorized practice of law; duty of care; absolute rights; the Freedom of Information act and Insurrection. The rights on the line in this case are as necessary as the air we breathe; we simply can not allow centuries of progress to be retarded.

Unauthorized Practice of Law/ Contract Law/ Promissory Estoppel/ Unjust Enrichment:

The defendant/ State of Indiana/ lower court tribunals repeatedly advanced the argument that "ignorance of the law is not a defense". I advance my disagreement with that legal interpretation

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because no individual should be held to any law or contract of which the individual does NOT have **ACTUAL KNOWLEDGE** of the law, rights and responsibilities. I will also assert that there is not and can be NO meeting of the minds as required by contract law if the full contract (including its rights; responsibilities; and regulations) is never disclosed to both signing parties. What did they say? Ignorance of the law is not a defense. And then turn right around and say that you have no duty to inform me, you've testified that you have actual knowledge that I am a Layman, and that I would not be expected to know the law, then you punish me for not knowing the law by asserting your argument that you have **NO DUTY to INFORM** me of the laws or you **CAN NOT ASSIST** me with the explanation of the laws. It should be considered entrapment to make a law, be informed that the community is NOT AWARE of the law or has NO actual knowledge of the law, and then punish the "ignorant" community for being "ignorant" of a law you created and failed to inform them of. It appears that the reasonable man standard of the laws prevent an individual, a corporation, or a country from unjust enrichment and prosperity from their own delinquent actions.

Because of hired corporate lawyers; these actions also do not appear as individual actions but all related in acts, location, and injury according to joinder pleading defenses [**Fed. R. Civ. P. 18; Ind. Trial R. 19**] all related cases in actions and injury should and must be joined to preserve the fiscal economics of the judicial process. Therefore, when the district court dismissed my case 3:19-cv-01062 offering the pleading defense that the district court did not have subject matter jurisdiction prior to the defendant even having a chance to answer the claim themselves, I feel that was an improper action taken by the district court.

Also when the district court dismissed my case **3:19-cv-01061** forcing me to participate in arbitration per the defendant's motion enforcing their arbitration agreement, and failed to order the arbitration claiming the district court was unsure of its jurisdiction over the defendant having actual knowledge of the defendant's business ties to the community; and forcing me to assume the responsibility of initiating an arbitration process (having been informed that I had not received the arbitration contract until after I initiated the federal complaint and that I was "ignorant" of the rights and responsibilities of the clause) severely prejudiced my claims and ultimately my federal complaint, and allowed the defendant to illegally waive my rights to a trial by jury. I also advance that these specific actions appear to be corrupt and cruel, and conduct parallel to judicial disability also known as insurrection and rebellion against the constitution of the United States.

I Draw the Court's Attention to what I like to call Indiana's Dirty Little Tricks: All confirmed in Crucial Audio Evidence and Documentation Evidence listed as Exhibit B, Exhibit C, Exhibit D, Requests for Help and additional Evidence.

- **CRUCIAL AUDIO EVIDENCE:** was sent to all parties, but removed from this petition per the Supreme Court Clerk's instructions awaiting The Court's further instructions

Indiana's public agency intentions appear deliberate and malicious when they offer Housing Choice Vouchers to needy recipients in the community who and then, systematically allow every

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housing specialist, housing management, and property owners to raise their rents just above the qualifying Fair Market Value rent for the area, therefore giving those property owners and property managements legal rights to disqualify needy recipients from open and available housing units in the community.

The Indiana Housing Authority then restricts and limits the HCVs (otherwise known as the Section 8 Program) to those communities with limited or non-existent housing without granting any reasonable accommodation of any opportunity for an extension on time to find available housing or time to accommodate a waitlist approval. Also intentionally refusing to keep lists of property owners and property management agencies who will accommodate the HCV and

leaving the search up to (indigent and in some cases disabled individuals who [like myself] are proven to have limited resources otherwise they would not be qualified for the NEEDY ASSISTANCE program in the first place) the program recipients to locate and acquire housing in a limited housing area; having full knowledge of the recipient's indigent status and the available housing market; however when asked for advice or assistance - Indiana's state agency employees respond by stating, "there is nothing you can do" but apply for an extension that we (the State) have already pre-determined not to award you. Because apparently lack of community housing (for which your HCV is restricted); lack of accommodations; and lack of consideration are **NOT EXTENUATING CIRCUMSTANCES** that qualify for the reasonable accommodation request of an extension of time to acquire available housing. It's like giving a person who can't breathe an oxygen mask and folding the hose. It makes recipients feel helpless and hopeless. It appears corrupt and cruel.

It's the same similar activities and actions of Indiana health care. Indiana does offer HIP and Medicaid to its citizens, they don't require any of the medical professionals in the state to accept the Indiana indigent health care insurance. South Bend, Indiana citizens find it almost impossible to locate available quality health care providers. It's not that they do not exist; it's that Indiana allows them to reject Indiana Medicaid and Indiana HIP insurance. It appears unfair to allow any business to function or flourish in any community and allow that business to maintain the rights to refuse services to indigent community members.

These actions also appear corrupt and cruel and leave program recipients feeling less valuable and expendable. Similar to [Brown v. Board of Education 1954] where this Court observed that equal protection does NOT include: Making other individuals feel inferior by treating them unfairly. It ONLY appears as though the State of Indiana Does Not Care About Us.

SUMMARY:

While employed by Conduent Human Services/ the State of Indiana: When it appeared that I was assaulted, discriminated against, raped, humiliated, and retaliated against. I went to the employer for protection and I was denied.

I went to the EEOC for investigation of my complaint and permission to file a Charge of Discrimination in federal court and I was denied. I went to the district court for justice, for fair

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administration and for equal protection and I was denied and forced into arbitration. I went to arbitration in hopes of a fair administration in the dispute resolution process and I was denied. Then I went back to the district court to enforce my right to appeal any fraudulent and unfair arbitration practices, to exercise my legal right to judicial intervention and I was denied. I went to the United States court of appeals for the seventh circuit for reconsideration of my federal complaint and my fundamental right to one appeal under the Indiana and United States Constitutions and I was denied.

RELIEF REQUESTED:

Because it appears obvious that I cannot trust the state of Indiana or the lower court tribunal to protect my fundamental rights to a fair administration of justice, my rights to life and liberty, to be heard, due process, and equal protection of the laws:

I am asking this Court to overturn the lower court's decisions and for this Court to grant me a Directed Verdict of my Judicial intervention request, which includes but is not limited to my injunction requests for Sanctions and Restraining orders and compensation; my declaratory judgment request, default judgment request and of my appeal requests. I am also asking this court grant a direct verdict for my emergency disability accommodations requests, including but not limited to; my in Forma pauperis requests; and my requests to file electronically requests and my request for permission to file court document actions and evidence electronically; until the completion and End of Justice for this specific federal complaint.

For the time that this employer (and its Employees, and Affiliates of this employer), did appear to have intentionally, neglected its absolute duty of care; by continuing to allow their employees, affiliates, and corporation staff members to continue to violate mine and my families fundamental and constitutional rights of privacy; freedom and liberty, fair housing and health, equal employment opportunity, due process and equal protection of the laws, freedom of information act and notification of all rights, responsibilities and policies and laws.

I am also asking this court for delivery of all of the evidence I requested in my foia file requests, and that same FOIA file information be given to me from every affiliated Indiana agency. Any agency affiliated with this employer (Conduent Human Services, LLC.) and their affiliate state of Indiana agencies containing my personal information. And I would like the Court to enforce stronger penalties on agencies that refuse to come into compliance with the already well established laws and public policies protecting the citizens rights to information.

I also ask that this Court, being fully informed of my intent to assert my defense of legal disabilities and developmental reading disabilities, do NOT hold me accountable to specific legal and pleading technicalities that DO NOT speak to the truth of this dispute because I am without adequate professional legal representation and have been since the initiation of this federal complaint. I am advancing UNDER OATH that I have complied with the Court's rule and regulations to the best of my abilities without adequate reasonable accommodations.

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CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

PAULA W. WILLIAMS

Date: September 19, 2022 / & Resubmitted on December 5, 2022