

ORIGINAL

22-6518

SCOTUS APPEAL NO.

IN THE SUPREME COURT OF THE UNITED STATES

Original Jurisdiction Division

Ms. Jenkins, Beverly A. [Pro se]

Petitioner/Appellant/Plaintiff

vs.

The Geogroup, Inc., d/b/a WellPath Recovery

Solutions, LLC, a/k/a Geocare, LLC,

BRANCH "et al",

Respondents.

Corrected 12/26/22

[I Clarified with Court that as per pro se litigant Instructions only forms pgs. 14-25 are required as per rule 14]. On Petition for Writ of Mandamus to the U.S. court of Appeals for the 11th Circuit, brought Pursuant to 28 U.S.C :1651(a) and 1251, and U.S. Const., Amendments 5 and 14. (e) Cover Page: In re: [Ms. Jenkins, Beverly A] Petition for Writ of Mandamus .Nature of the Proceeding: federal question: Illegal violation of Petitioner's 5th and 14th Amendment Constitutional Due Process Rights, etc.

X Ms. Jenkins, Beverly A. Appeal No. 21-12651

Homestead, FL. [REDACTED] Case No. 1:21-cv-21630-JLK

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Ms. Jenkins, Beverly A. vs. The Geogroup, Inc., BRANCH "et al"

Appeal No. 21-12651 Case No. 1:21-cv-21630-JLK [civil

Action brought Pursuant 28 U.S.C :1651(a) and 1251, and U.S.
Const., Amendments 5 and 14]

The Questions Presented for Review:

3. Is it herein shown that the LT deviated from **Sufficient Instructions/ required sufficient Notice for non-counsel litigants?** 2. Is it herein shown that the LT (and Respondent- Defendant) deviated from (abridged and rendered invalid) **Equal protections of the Law, and Due Process Procedurally and substantively against the petitioner's Rights?** 6. Is it herein shown that the LT withheld Lawful orders (and caused undue delay) against factors showing the establishment of Prima Facie in this case? And Against factors shown to Not support a Lawsuit Dismissal? *John Pro S*

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[REDACTED] Petition unpaginated Pgs.1-16

and 2nd : paginated pgs. 1-14 herein, and Appendix A all
referenced pages and all lines].

Listed Parties

[Completed strictly as shown by required rule 14.1(b)(1)]:

All Parties do not appear in the caption of the case on the cover page.

(Hon. Elizabeth L. Branch), Luck (Hon. Robert J. Luck), Lagoa
(Hon. Barbara Lagoa). Hon. James Lawrence King.

Related Cases

[Completed strictly as per pro se litigant instructions, and by required rule 14.1(b)(iii)]: **Appendix A 1.** Ms. Jenkins, Beverly A. vs. The Geo group, Inc., BRANCH "et al" "ECF" Doc. 32 Appeal No:21-12651 case no. 1:21-cv-21630-JLK Order granting Defendant's Motion to Dismiss without required Controlling or Compelling Justification? 7/16/21 Pgs. 1-4 of 4 .

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of 2. [W.O.C.J. OR C.J].

4. Ms. Jenkins, Beverly A. vs. The Geo group, Inc, BRANCH

"et al", "ECF" case No: 21-12651, U.S. court of appeals for the

11th Circuit, Order decided Entered June 8,2022. [accessible

7/25/22 Pgs.1-3 of 3]. [DNP directive maintained].

5. Ms. Jenkins, Beverly A. vs. The Geo group, Inc., BRANCH

"et al" "ECF" Doc. 32 Appeal No:21-12651 case no. 1:21-cv-

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OPINIONS BELOW

This case is on-going whereby, it has only been shown to be published as shown in the dockets at this time.

For to not be redundant, please See unpaginated pages 2-3 of 16 (as is required by pro se litigant instructions), for the specific indication as to where in the Appendix (see 1st section) each decision, reported or unreported, appears.

JURISDICTION

[In avoiding redundancy and in compliance with the pro se litigant's instructions despite it appears redirecting from required information?, I'm to provide only the dates of the lower court's decisions, that establish the timeliness of the petition for a Writ of Mandamus]. This information was also required on (1st set) unpaginated pages 2 – 3. [An extension of 60 days according to the SCOTUS rule 14(i)(vi)(5) is permitted from the date (11/4/22) of the clerk's letter]. *by pm sc*

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CONSTITUTIONAL AND STATUTORY PROVISIONS

INVOLVED [unlawfully violated : rendered invalid by
LT, Respondent-Defendant against the Petitioner]

[As per the pro se litigant's instructions, I'm to provide their
citation and indicate where in the Appendix the provisions
appears.]

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f.s. 817.05 making

false entries on books of Corporations [Pg.78 of 139 and see 46G,

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f.s. 817.031 making false statements or entries [79 of 139 and see.

47G], 18 U.S. Code:1001 (a)(2)(3) see Pg. 29G]. *for see*

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f.s. 768.72 (2)(a) Intentional misconduct / Pleading in a civil action for punitive damages [80 of 139 and see pg. 43G, 19 U.S. code 1592(a)(1) (A) (i), (2)(c)(1)and (3) see Pgs. 37G-40G, 15 U.S. code 6604 (a)(b) (3) see Pgs. 41G-42G].

f.s. 400.0237(2)(a) Intentional Misconduct

[19 U.S. code 1592(a)(1)(A)(i), (2)(c) (1) and (3) back Pgs. 37G-40G.

f.s. 400.0238 Punitive Damages

[15 U.S. code 6604 (a)(b) (3) back 41G- 42G.

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In this Civil Action, Ms. Jenkins(petitioner) an employee for her employer The Geogroup, Inc. (Respondent/Defendant) with all satisfactory and exceed satisfactory evaluations, Objected to, refused to participate in and in accordance with Defendant's proper reporting policies, Ms. Jenkins wrote a PAR on management concerning a delayed issued Emergency treatment order erupting in imminent violence: threat to kill Ms. Jenkins (nurse) by a violent patient, and injury to other staff and patients. When on 4/10/13 in the defendant's effort to avoid corporate review of the 4/9/13 incident, the Defendant abruptly breached its equal employment opportunity contract and discharged Ms. Jenkins's employment from with the company on false statements that Ms. Jenkins was said "Insubordination" and "with behavior" from said 2/21/13? Which is shown in

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accordance to its summary of findings ["Ms. Jenkins was expected to work up to 11:30pm"], I worked up to 11:34pm in accordance to its 5-7 minute before and after rule. No Command nor OT Authorization was given. The only supervisor that worked the night of 2/21/13 Couldnot and did not sign for what never happened on said 2/21/13 or at anytime] This is shown to have been Pretextual, intentional and a direct and proximate cause, resulting for petitioner in abrupt loss of employment, loss of income, Embarrassment in front of staff, loss of Foundation/ home foreclosure, New car repossessed, SUV was a forced sell, and other property losses occurred in unpaid storage. Pain, Suffering, Mental Anguish, Stress, and damaged reputability for new employers concerning Ms. Jenkins moving forward . Ms. Jenkins's life has been left in limbo ever since. This ~~abridges~~ constitutes a showing of Defendant's Unlawfully Abridging

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of Ms. Jenkins's Life, Liberty, and Property and Equal

**Protections of the Law, without required Due Process of
Law. This shows an unlawful violation of Due Process (**
Procedurally: legality and fair procedure, and Substantively
re: Fraud and Breach of Equal Opportunity Employment
Contract it owed to petitioner) ; unlawful violations of the
5TH and 14TH Amendments to the U.S. Constitution. These
are the shown facts along with the evidence of proof , and
applicable Law provided here in the record . This invoked
the Territorial and federal question / (Constitutional)
Subject-matter Jurisdiction of the federal court in the 1st
instance. The Federal court as is shown in the 1st set of
pages herein: pages 2-3 of 30 [FLSD "ECF" 7/16/21 pgs.1-2
of 2], to have hereby further abridged petitioner's equal
protections of the Law, Life, Liberty, and property without
due process. *4 pgs* paginated 7 of 14

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The U.S. Court of Appeals 11th Circuit as is shown in the

1st set of pages herein: pages 2-3 [USCA11 "ECF" said

6/8/22 accessible 7/25/22 pgs. 1-3 of 3 entered an order For

Authorized parties only for viewing for correction

considerations], The U.S. Court of Appeals 11th Circuit as

is shown in the 1st unpaginated set of pages herein:

pages 2-3 of 30 in total [USCA11 "ECF" 7/25/22 Pgs. 1-2

of 2 entered 1st notice of judgement said entered 6/8/22

noted entered 7/25/22], is hereby shown to have further

Abridged Petitioner's Equal Protections of the Law, Life,

Liberty, and Property without Due Process rendering

these herein listed Florida statutes and parts of the

Constitution, rules and other applicable precedent

Authorities, invalid, without required "compelling

justification"; violation of Authority of NAACP v. ~~Epri~~

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See : *American Communications Assn. v. Douds, supra*, at 339

U.S. 400; *Schneider v. State*, 308 U.S. 147, 308 U.S. 161. Such a

"... subordinating interest of the State must be

compelling," *Sweezy v. New Hampshire*, 354 U.S. 234, 354 U.S.

265 (concurring opinion). **In these ways it is shown how the**

LT(s) deviated from these listed ministerial duties and

how it withheld lawful orders and caused undue delay in

this case, hereby constitutes a showing of district courts

vitiating its obligation to follow precedent, a usurpation

of judicial power [Vol. 90, No.2 February 2016 Pg. 10;

Appendix A back section Rule 14 (i) (vi) Pg. 26G herein

in Litman v. Mass. Mut. Life Ins. Co., 825 F. 2d 1506,

1509(11th Cir. 1987) suggests Mandamus Authority can be

exercised when District courts vitiate their "Obligation

to follow precedent" which the 11th circuit defined as an

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essential factor in the proper operation of the judiciary.

Critically the U.S. Supreme court's position is that

mandamus is appropriate herein] and committing a

plain Illegal discretionary error (in a mandatory

jurisdiction matter, where there's to be no element of

discretion where there's precedent Authority see

Appendix A back section Pg. 26G) and thereby

committing an abuse of Discretion which is the standard

of review in this case, against required factors shown to

support the establishment of prima facie in this case?

against defendant's own written testimony, and against

other factors shown to not legitimately support a

lawsuit dismissal. The above underlined showing of the

Evidence of proof to petitioner's claims and damages

and to all the relevant facts and applicable precedent

Authority, are verifiable as follows: Petition All Pages

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(1st set and 2nd set of pages) All Lines. Appendix A Front

Middle, Back sections, All pages All lines.

REASONS FOR GRANTING THE WRIT

In addition to all the relevant reasons provided above herein this petition, This court has Jurisdiction in this matter where The LT has decided an important federal question in a way that conflicts with relevant decisions of both the LT and this Court, and has so far departed from the accepted and usual course of judicial proceedings. This civil matter is shown to be one of exceptional circumstances (Employer breached EOE contract on unlawful false statements) of peculiar Emergency (with damages leaving petitioner's life in limbo) or public importance (unlawfully rendering invalid florida statutes, and Guaranteed Constitutional Protections) see Cheney v. United States Dist. ^{Sup. Ct.} Court for D.C. (03-475) 542 U.S. 367(2004)334 F.3d 1096].

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SCOTUS No._____

Ms. Jenkins, Beverly A. vs. The Geogroup, Inc., BRANCH "et al"

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**Also, In aid of the LT's jurisdiction, the Writ will
enhance the public views of the court's Integrity, and
will enable trust in the justice system. An extraordinary
Writ will redress exceptional circumstances of peculiar
Emergency and of public importance.**

Conclusion

**For reasons provided throughout this petition, All
unpaginated and paginated pages All Lines, and in Appendix
A All pages all Lines, and for good cause and sufficient
justification shown, the court should grant proposed order to
petition for Writ of Mandamus and Grant Issuance of Writ as
a matter of Law, for to prevent a manifest injustice, and
adequate relief cannot be obtained in any other form or
from any other court. X *On Behalf of* Ms. Jenkins, Beverly A.**

Homestead, Fl,

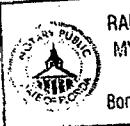
SCOTUS No. _____
Ms. Jenkins, Beverly A. vs. The Geogroup, Inc.

Appeal No. 21-12651 Case No. 1:21-cv-21630-JLK

AFFIDAVIT OF TRUTH MADE IN GOOD FAITH

IN COMPLIANCE WITH 28 U.S.C : 1746 I, ATTEST
TRUTHFULLY, UNDER PENALTIES FOR PERJURY (IF SO
FOUND/EXPLANATION WILL BE PROVIDED) THAT I'M
AAOX3 COMPETENT U.S. CITIZEN, LPN IN THE STATE
OF FLORIDA. THE INFORMATION SHOWN, PROVEN,
AND FILED HEREIN THIS RECORD IS COMPLETED AS
BEST AS REASONABLY POSSIBLE, (AGAINST
DISCREPANCIES), AND ARE TRUE TO THE BEST OF MY
KNOWLEDGE AND GOOD FAITH BELIEF, AND THIS
AFFIDAVIT MAY REQUIRE COPYING AND PAGINATION
TODAY, AND HERE AFTER _____, AND SHALL BE
USED FOR THAT PURPOSE.

X Beverly Pro se

FOR AN ACKNOWLEDGEMENT IN AN INDIVIDUAL CAPACITY:	
STATE OF FLORIDA COUNTY OF <u>Miami Dade</u>	
The foregoing instrument was acknowledged before me this <u>13</u> day of <u>December</u> , 20 <u>22</u> , by <u>Beverly ANN JENKINS</u> (name of person acknowledged).	
 (NOTARY SEAL)	RAISA HERNANDEZ RODRIGUEZ MY COMMISSION #HH186322 EXPIRES: DEC 19, 2025 Bonded through 1st State Insurance
 Signature of Notary Public	
Personally Known _____ OR Produced Identification _____ Type of Identification _____ Produced <u>Driver license</u>	

SCOTUS No. _____

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Appeal No. 21-12651 Case No. 1:21-cv-21630-JLK

Plaintiff's signatures with or without text, should not be used as Authorization for removal of petitioner/Plaintiff out of the state or country. No infringing. No unlawful activity.

Constitutional Protections Apply].

X on file Ms. Jenkins, Beverly A.

Homestead, Fl.

Ph: xxx xxx-xxxx

[This signature page makes 30 total pages and is
Followed by certificate of Service and certificate
of Compliance pages]