

SCOTUS APPEAL NO. 22-6518

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.

RESPECTFULLY

**PETITION (MOTION) FOR REHEARING**

[NO OFFENSE TO ANYONE]

**Pursuant to Scotus Rule 44: I, Petitioner, Petitions**

this court in due diligence for to request legitimate follow

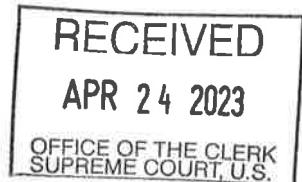
through (completion) with first formal hearing that

remains pending, via Granting an order granting (closest

applicable) Petition (Motion) for rehearing.

**Legal Grounds for this Petition (Motion) are as follows:**

1. This court's denial Order to petitioner's Petition for Writ of Mandamus (dated 3/20/23), is shown denied on **No legal grounds**. This Constitutes a showing



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of a Deviation from a legal rule (rendering invalid): Fla. R. Jud.

**Admin Rule 2.120 (C), and Fairness: Precedent Procedural**

**and Substantive Due process, against the required: shown**

Facts, shown Evidence of proof to the shown claims [r. Petition

**All Pages, All lines. Appendix A All pages all lines, 29G-**

**52G] and against shown claims and precedent Authority [Viola-**

**tions of rendering invalid U.S. Code: 1001(a)(2)(3) false**

**statements or entries, 19 U.S. Code:1592 (2)(c)(1) and (3)**

**Penalties for Fraud and Intentional Misconduct and**

**shown Damages, 15 U.S. Code: 6604 (a)(b)(3) NO CAP], and**

is shown to thereby be An Abuse of Discretion [violation of 5

**U.S. Code:706, Appendix A front section Pg. 6 and 8 of 139],**

**and unlawfully inconsistent with the accepted, and usual**

**course of civil (legal or Authorized) procedure, and with the**

**Constitution, or with court rules, and administrative**

**orders entered by the supreme court ; unlawfully** 

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coming within the petitioner's 5TH and 14TH Amendme-

nts, U.S. Constitutional Rights to Due Process, Procedural Due

Process, and Substantive Law Due Process [r. Appendix A (all

pages apply) Mid section USCA11 11/23/21 page 4 of 58, Fla. R.

JUD. Admin rule 2.120(c), Mid section Pgs.16,18,20-21 of 69 and

Back Section Rule 14 (I)(VI) Pages 24G-52G, and in Petition All

Pages], and are thereby Non-Legally Binding as a matter of

Law]. For this reason, I Object to the Illegality of the above

referenced Denial order, and the informal orders in the record,

as a matter of Law. 2. The same is shown in the record that

the Respondents' orders fall short of controlling and compelling

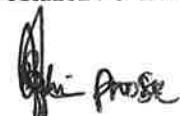
justification, and the Respondent-Defendant's Abrupt Discharge

of the Petitioner on unlawful actionable False Statements and

written on the books of a Corporation (Fraud and breaching of

Equal Employment Opportunity contract; Substantive Due

Process ,and with Intentional Misconduct, Etc.

A handwritten signature consisting of a stylized 'A' and the word 'prose'.

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violations) and are all shown to have abridged petitioner (a

**U.S. citizen) of her life, as a direct and proximate result**

my Foundation (home was foreclosed), employment, income

and Good reputation for legitimate and fair rehiring], My

**Liberty** [ my freedom, and independence was ceased], and

**My Property**[my new vehicle was repossessed, my SUV was

a forced sell, all of my other belongings were lost in unpaid

storage]. These were unlawfully abridged without Due process

of law or compelling or controlling justification; **violations of**

**the 5<sup>th</sup> and 14<sup>th</sup> Amendment due process clauses r.**

**pages 16 of 69 of court issued set 2 in USCA11 date filed**

**11/23/21] Along with Ongoing Pain, Suffering, Mental**

**Anguish, Undue Stress and Litigation Delay.**

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**[In General see Coversheet and All pages, All Lines of**

**Petition and in Appendix A also, for reference].**



**3. Petition filed under 28 U.S. Code: 1651(a) and 1254(1).**

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4. Res judicata can't legally be applied where formal Adjudication (Authorized) 1<sup>st</sup> consideration in a civil Action remains pending.

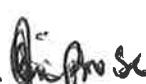
5. The respondents / respondent-Defendant filed either No response or No legitimate (legally sufficient or substantial) Objections or rebuttal responses. 6. There's no other remedy to solve this legal matter for to enable me to regain clarity, & focus and maintain my already authorized licensure and competency requirements, etc. 7. The

Evidence of Proof to petitioner's innocence, claims, and Damages are referenced herein and shown in the record, and are undeniably true. 8. The Evidence of Proof showing that the

defendant is undeniably more "likely (probable) than not" liable for petitioner's shown claims and Damages, as are referenced

herein and shown in the record, 9. Petitioner's life has remained in limbo x 10 years pending Required proper closure and Due

relief recovery, for to move forward in life. 10. DNP Order

remains unpublished herein. (Authorized viewing only). 

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11. There remain No evidence in the record to Resp-Def. false claims ("Insubordination" and "with behavior") made against petitioner. 12. This is an URGENT HIGH PRIORITY MATTER: Petitioner's life and livelihood is subject to further endangerment and homelessness as my family's housing lease is set to soon expire, this matter requires Due relief without further undue delay. 13. I certify as a party unrepresented by counsel, that this petition (Motion) [and all pleadings filed] is presented in Good Faith and not for delay. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Supporting Legal Precedent Authorities and other Applicable Legal Authorities are as follows: Fla. R. Jud. Admin Rule 2.120 (C) as is approved by the United States Supreme Court, *pro se* 6 of 14

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**holds that an Administrative order is a directive**

**necessary to administer properly the court's affairs,**

**but NOT inconsistent with the constitution or the**

**court's rules and administrative orders (meaning**

**lawful orders) entered by the Supreme Court. [r.**

**currently not shown to be uploaded yet in SCOTUS ?,**

**[r. page 4 of 58 of court issued set 3 in USCA11 date**

**filed 11/23/21 Appendix A mid-section]. Like so as it**

**applies in this case, The above referenced Petition**

**denial order is shown to be inconsistent from with**

**the Constitution or the court's rules (as is herein**

**shown), and from with legitimate administrative**

**orders entered by the Supreme Court as is Explained**

**and shown below:**

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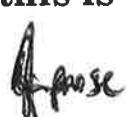
**In The Supreme Court's Precedent Legal Authority:**

**"NAACP v. Patterson, 357 U.S. 449 (1958) 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,"**

Like so as it applies in this case, An order denying relief (Petition for Writ of Mandamus) must be compelling, and these are shown in the record to NOT have any compelling reasons for denial. Pursuant to Pp. 357 U.S. 454-458: "denial of relief in this Federal court matter does not rest on adequate state nor Federal grounds, and this court has jurisdiction to entertain petitioner's federal claims". Although this is NOT a state court matter, This referenced legal 

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**Authority [Fla.R.Jud.Admin. rule 2.120(c)] is an  
applicable Legitimate Federal Court Administrative  
order that was entered by the U.S. Supreme Court, The  
Highest Federal Court and The Supreme Law of the  
Land.**

**Pursuant to Page 357 U.S. 466 This court held "that the  
immunity from state scrutiny of membership lists which  
the association claims on behalf of its members is here so  
related to the right of the members to pursue their lawful  
private interests privately and to associate freely with  
others in so doing as to come within the protection of  
the 14TH Amendment, and we conclude that Alabama  
has fallen short of showing a controlling justification  
for the deterrent effect on the free enjoyment of the right  
to associate, which disclosure of membership lists is ~~unjust~~**

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**likely to have Accordingly, the judgement of civil  
contempt and the \$100,000 fine which resulted from  
petitioner's refusal to comply with the production order**

**in this respect must fall". Like so as it applies in this  
Federal court case, the Federal Courts' Orders which are**

**shown to have come within the 5<sup>th</sup> and 14th Amendment  
rights and have fallen short of showing a controlling**

**Justification (or any justification see petition and Proof  
Accompanying Appendix A All pages and All lines each)**

**in this respect must fall. This court has generally insisted**

**that parties rely on constitutional rights which are**

**personal to themselves [as it applies in this case to**

**Petitioner] Tileston v. Ullman, 318 U.S.44; Robertson and**

**Kirkham, Jurisdiction of the Supreme Court (1951 ED),**

**: 298. [r. currently not shown to be uploaded yet in ]**

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**SCOTUS ?, r. page 61 of 69 of court issued set 2 in USCA11**

**date filed 11/23/21].**

**Pursuant to Page 357 U.S. 467**

**For the reasons stated , the judgement of the supreme**

**court of Alabama must be reversed, and the case**

**remanded for proceedings not inconsistent with this**

**opinion.”**

**Reversed.**

**Like so as is stated and shown herein, the referenced**

**Illegitimate judgement of the U.S. Supreme court of the**

**United States rendered in this case dated 3/20/23, must**

**be reversed, and the case remanded for proceedings not**

**inconsistent with this (the 1<sup>st</sup> legitimate U.S. Supreme**

**Court’s Precedent Authority) opinion.” As a matter of**

**Law under precedent Authority.**



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[r. currently not shown to be uploaded yet in

**SCOTUS ?, r. page 66 of 69 of court issued set 2 in**

**USCA11 date filed 11/23/21 and also r. see pgs.16,18,20,21,**

**and 53-67 of 69 of this set].**

Wherefore, on Petition (Motion) for Rehearing as  
specified herein, Petitioner Petitions this court for  
(relief sought) to grant an order granting Petition  
(Motion) for Rehearing for to allow a Plain, Clear,  
Discretionary error [the 3/20/23 Order and see Appendix  
A back section Pg. 25G], that seriously affects the  
fairness, Integrity, and Public reputation of judicial  
proceedings, to be corrected, and for to be Consistent  
with the Constitution, and with the Court's rules as is  
required by Fla. R. Jud. Admin Rule 2.120 (C), and / or  
allow any other accepted and Lawful reasonable  
relief in this Civil Federal Court Action. 

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**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 Jenkins Pro se

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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> <u>2022</u> , by <u>Beverly ANN JENKINS</u> (name of person acknowledged)	
 <b>(NOTARY SEAL)</b>	RAISA HERNANDEZ RODRIGUEZ MY COMMISSION #HH186322 EXPIRES: DEC 19, 2025 Bonded through 1st State Insurance
 Signature of Notary Public	
Personally Known _____ OR Produced Identification <input checked="" type="checkbox"/>	
Type of Identification Produced <u>Driver license - 342-0</u>	

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**Certification of a party unrepresented by counsel**

I, Petitioner, certify that This Petition (pursuant to SCOTUS Rule 44) is presented in good faith and not for delay.

This page is provided as early as sufficient notice was received and is for petitions filed in general up to current, followed by Certificate of Service and Certificate of Compliance sheets.

**[Initials or signatures herein, are not Authorized for Infringing on petitioner's life (including family's lives), liberty, Rights or Location, nor against any removal of petitioner from out of the U.S.A].**

x  Ms. Jenkins, Beverly A.

**Homestead, Fl.**

**Ph. (xxx) xxx-xxxx**

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**CERTIFICATE OF SERVICE**

I CERTIFY THAT ON THIS 14<sup>th</sup> - 18<sup>th</sup> DAY OF APRIL, 2023

I SENT THIS DOCUMENT BY U.S. MAIL COURTESY COPY  
TO THE FOLLOWING:

Mr. J.H. Wyman or to new Assigned counsel

Coral gables, Fl., Mr. D. Gonzalez or to new Assigned  
counsel

Ft. Lauderdale, Fl.

U.S. Court of Appeals 11<sup>th</sup> Cir., Atlanta, GA.

Solicitor General of the United States, Dept. of Justice

Washington D.C. The U.S. District Court for the Southern  
District of Florida, Miami, Fl. x  Ms. Jenkins, Beverly A.

Homestead, Fl.



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**CERTIFICATE OF COMPLIANCE**

I certify that this document complies with the type face requirements of Fed.R.APP.P 32(a) This Brief / Motion / other (as it may apply), has been prepared using Century schoolbook which is a proportionally spaced face that includes serifs, in 14-point type. This document contains Approx.2222 words According to Microsoft Word.

[Appendix pages Not Applicable].

X



Ms. Jenkins, Beverly A.

Homestead, Fl.

PH:(xxx)xxx-xxxx