

No. 22-7063

ORIGINAL

IN THE
SUPREME COURT OF THE UNITED STATES

FILED
MAR 16 2023
OFFICE OF THE CLERK
SUPREME COURT, U.S.

COLBY DRANOEL LEONARD
PETITIONER

VS.

James Leblanc, sec. of D.O.C

Cranford Jordan, sheriff of L.S.A.

Keith Deville, Worden at W.C.C.

David Yount, Ed. Dir. at W.C.C.

RESPONDENTS

ON PETITION FOR WRIT OF CERTIORARI TO

UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT

PETITION FOR WRIT OF CERTIORARI

3-9-23 COLBY DRANOEL LEONARD #536844

P.O. BOX 174

St. Gabriel, Louisiana 70776

QUESTIONS PRESENTED

- 1.) Should have the State District Court transferred Mr. Leonard's Civil suit to the correct venue/jurisdiction?
- 2.) Did a joint tenancy contract between the State of Louisiana Department of Public Safety and Corrections and Louisiana Sheriff Association with a private management company outside of the state violate, "the Compact Clause" of the constitution regarding correctional facilities?
- 3.) Is the State of Louisiana Department of Public Safety and Corrections and its employees considered the "Reasonable Man", responsible for "Due Care" of prisoners in a joint tenancy contract.
- 4.) If a Federal District court can transfer a civil action to a Federal District Court of proper venue/jurisdiction can the State District Court do the same?
- 5.) When the State of Louisiana offers programs, reform, rehabilitation, education and vocational skills, etc. to prisoners shall it be equal or can it be in inequality towards prisoners in like circumstances?
- 6.) Can the deprivation of one's constitutional rights be the cause of injury?
- 7.) Is prison programs, reform, rehabilitation, education and vocational skills good or not good for the interest of the public and its safety?

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:

James Leblanc, sec. Department of Public Safety and Corrections
Cranford Jordan, Louisiana Sheriff Association
Keith Deville, Warden at Winn Correctional Center
David Yount, Education Director at Winn Correctional Center

RELATED CASES

Colby Dranoel Leonard Vs. Louisiana Department of Public Safety and corrections Case No. # C-667318

Colby Dranoel Leonard Vs. Louisiana Department of Public Safety and Corrections Case No. # 2020-CA-0891

Colby Dranoel Leonard Vs. Louisiana Department of Public Safety and Corrections Case No. # 2021-CI-00398

Colby Dranoel Leonard Vs. Louisiana Department of Public Safety and Corrections Case No. # 2021-CI-00463

Colby Dranoel Leonard Vs. James Leblanc, Etc. AL. civil action case No. # 21-645-SDD-RLB

Colby Dranoel Leonard Vs. James Leblanc, etc. AL civil docket case No. # 1:22-CV-00369

Colby Dranoel Leonard Vs.
James Leblanc
Cranford Jordan
Keith Deville
David Yount
} civil action case No. # 22-30265

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TABLE OF AUTHORITIES CITED

CASES

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OTHER

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 G 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 E 3 F 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**:

The opinion of the highest state court to review the merits appears at Appendix C 3 D 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 19th J.D.C. Parish of East Baton Rouge court appears at Appendix A to the petition and is

☐ reported at _____; or,

☐ has been designated for publication but is not yet reported; or,

☒ is unpublished.

JURISDICTION

☒ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was March 31st 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: December 21st 2022, and a copy of the order denying rehearing appears at Appendix G.

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

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

☒ For cases from **state courts**:

The date on which the highest state court decided my case was September 27th 2021.
A copy of that decision appears at Appendix E & F.

☐ 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).

JURISDICTION

THE Jurisdiction of this Court is invoked under 28 U.S.C.. Only the United States Supreme Court have power to review a violation of the "Compact Clause" of the Constitution. This compelling reason need some jurisprudence from the highest jurist of the Land for this is a matter unaddressed as we thirst for answers. Yet, according to Supreme Court Rule #10 (a), the Federal District Court for the Middle district transfer this civil action to another Federal District Court for the Western district, Alexandria Division in the state of Louisiana giving it to its proper jurisdiction/venue, which means it's actions conflicts with the Courts of the State of Louisiana or the courts of the State of Louisiana actions conflict with proper court procedure and federal District court actions because the State District Court, The State Court of Appeal for the First Circuit and the State of Louisiana's Supreme Court never attempted to transfer the civil suit to its proper venue/jurisdiction somewhere the breach of comity exists. If just a simple transfer to a court of proper venue/jurisdiction is usual in the course of judicial proceedings then the actions from all courts in the State of Louisiana district, appeal and Supreme has departed so far from the accepted and usual course. As to wher Supreme Court rule #10 (c) actions from all state of Louisiana courts and the Federal District court brings about an important question that has not been, but should be, settled by the United States Supreme Court. In no way should the State of Louisiana continue to escape justice violating the Constitution and depriving citizens of Rights refusing to protect the safety of the Public this Writ or certiorari come from a 90 day window from a "stay of Mandate" from the United States Fifth Circuit court of Appeals civil action No. #22-30265,

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- 1.) "COMPACT CLAUSE" of THE United States Constitution Art. 1, Sec. 10, Cl. 3
"No State without the consent of Congress... enter into any agreement or Compact with another State or with a foreign power relating to boundaries, ports, conservation and flood control, educational and correctional interests. (pg. 10, pg. 17-18)"
- 2.) 9TH Constitutional Amendment of the United States
"Rights listed in the constitution must not be construed in a way that denies or disparages unlisted rights which are retained by the people. (ratified with the Bill of Rights)" (pg. 10, pg. 16, pg. 17-18)
- 3.) 10TH Constitutional Amendment of the United States
"Any powers not constitutionally delegated to the Federal government, nor prohibited to the States, are reserved for the States of the people." (pg. 10, pg. 16, pg. 17-18)
- 4.) 14TH Constitutional Amendment of the United States
"Prohibits states from denying due process and equal protection and from abridging the privileges and immunities of U.S. citizenship." (pg. 8, pg. 12, pg. 13, pg. 15, pg. 17-18)
- 5.) 8TH Constitutional Amendment of the United States
"prohibiting excessive bail, excessive fines and cruel and unusual punishment. (ratified by the bill of Rights)" (pg. 12, pg. 13, pg. 15, pg. 17-18)
- 6.) "PURSUIT OF HAPPINESS", Declaration of Independence (pg. 12, pg. 13, pg. 15, pg. 17-18)
- 7.) "PERSONAL LIBERTY", CIVIL RIGHTS ACT (pg. 12, pg. 13, pg. 15, pg. 17-18)

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

- 8.) Constitution of the State of Louisiana Article 1 Dec. of Rights 1 § 1
" Origin and Purpose of Government" (pg.10)(pg.16)pg.17-18)
- 9.) Constitution of the State of Louisiana Dec. of Rights Article 1 § 3
" Right to individual dignity" (pg.12,pg.13,pg.15,pg.17-18)
- 10.) Constitution of the State of Louisiana Dec. of Rights Article 1 § 7
" Freedom of Expression" (pg.12,pg.13,pg.15,pg.17-18)
- 11.) Constitution of the State of Louisiana Dec. of Rights Article 1 § 12
" Freedom from discrimination" (pg.12,pg.13,pg.15,pg.17-18)
- 12.) Constitution of the State of Louisiana Dec. of Rights Article 1 § 16
" Right to a Fair trial" (pg.8,pg.17-18)
- 13.) Constitution of the State of Louisiana Dec. of Rights Article 1 § 17
" Jury trial in criminal cases, Joinders of felonies, Mode of Trial" (pg.8,pg.17-18)
- 14.) Constitution of the State of Louisiana Dec. of Rights Article 1 § 20
" Right to Humane Treatment" (pg.12,pg.13,pg.15,pg.17-18)
- 15.) Constitution of the State of Louisiana Dec. of Rights Article 1 § 22
" Access to Courts" (pg.8,pg.17-18)
- 16.) 7th Constitutional Amendment of the United States
" the right to a jury trial in Federal civil cases that are traditionally considered to be suits at common Law and that have an amount in controversy exceeding \$20.00 (twenty-dollars) (ratified by the Bill of Rights)." (pg.8,pg.17-18)

STATEMENT OF THE CASE

Prisoner Mr. Leonard filed a complaint about discrimination in the Administrative Remedy Procedure with the Department of Public Safety and Corrections back in 2014. against Department of Public Safety and Corrections employees, shareholders and contractors. The Prison shut down and transferred Department of Public Safety and Corrections property to another Facility. Years later 2017 Mr. Leonard still having the same discrimination entering into state offered opportunities he had at Allen Correction Center, at the previous Winn Correctional Center. about discrimination and deprivation of things in like circumstances. Administrative Remedy Procedure was exhausted about equal treatment to anything state offered. No Remedy was given so suit was filed in the 19th Judicial District Court for the Parish of East Baton Rouge. Mr. Leonard was and still is property of the State of Louisiana Department of Public Safety and Corrections. A Magistrate Judge in the 19th Judicial District Court 2 years later recommended that the civil suit was in the wrong venue/jurisdiction outside the 1 year prescribed to file a proper suit. Mr. Leonard continued to Appeal at every level judicially and in the Louisiana Supreme Court 1 judge out of 7 said he would GRANT petition. Mr. Leonard later Filed Suit in the Federal District for the United States District Court for the Middle District in Louisiana. This Federal District Court transferred the civil action to the United States District Court of Western District, Alexandria. This Federal District Court and the Fifth Circuit Court of Appeals denied Mr. Leonard's Appeal on the note that court said Mr. Leonard as a prisoner "HAS NO RIGHT TO EDUCATION" or vocational skills in prison.

STATEMENT OF THE CASE

Mr. Leonard's questions of Law revolved around whether or not should education, vocational skills, programs, reform and rehabilitation should be given equally in like circumstances and not in ways depriving him of his constitutional rights. Leonard filed a complaint at every level about how Mr. Leonard's rights were violated because he was discriminated against deprived of his personal liberty and pursuit of Happiness. Officials continued the gross acts treating Mr. Leonard unhumane as a prisoner that led to a psychological evaluation and medication prescribed as a end result, injuring Leonard. Mr. Leonard pointed the finger at the secretary of the Department of Public Safety and Corrections Mr. James Leblanc who said that Louisiana Sheriff Association was responsible. The two came together in a joint tenancy contract that violated the Compact clause of the Constitution and the constitutional rights of Mr. Leonard. Only the United States Supreme Court could investigate this matter. Now, Mr. Leonard has arrived at the United States Supreme Court filing a Writ of Certiorari surrounding the same constitutional questions that has never been challenged in the State of Louisiana.

Could the State District court could have transferred civil action to proper venue/jurisdiction?

Should anything state offers to prisoners be given equally in like circumstances?

REASONS FOR GRANTING THE PETITION

Should have the state District Court transferred Mr. Leonard's Civil suit to the correct venue/jurisdiction?

2-27-18 a Writ of Praecipe was Filed by Mr. Leonard asking the court to order the prison to comply with Law. 2 years later the state magistrate filed a recommendation surrounding the jurisdiction/venue of the complaint that was over, well over the 1 year perscribed limitation to file a suit. Time had elapsed for the 1 year perscribed courts took 2 years to reply. In the state of Louisiana Law charted a 2 way path to file a complaint between state officials of the State Department of Public safety and corrections and Louisiana's Sheriff Association in a joint tenancy contract. The deporment of Corrections and the sheriff Association both became at the time the "Reasonable Man" responsible for "Due Care". Mr. Leonard did diligently appeal at all levels up until the United States Middle District Court for the state of Louisiana Federal 1983 suit was filed, The United States Federal Middle District court transferred to the United State Western District Court for the state of Louisiana Alexandria Division. At this point if it was proper court procedure... why didn't the state District Court Civil Department do the same? This transfer could have been done at the initiation of the suit. If the Federal courts knew it was improper venue why didn't Federal court send it back to the proper state district court? Can it still be done? Do the United States Supreme Court have that power? On 2-3-22 United States District Court Middle District of Louisiana transferred Civil action case No# 21-645-SDD-RLB to the United States District Court Western District Alexandria Division Civil Action case No# 1:22-CV-0369-DDD-JPM.

On that note the Federal courts could have related the suit back to the proper venue/jurisdiction using the "Relation Back" doctrine. The courts should be considerate when it comes to Pro-se litigants, they are allowed more freedom from limitations than litigants represented by counsels to correct see, (Moore v. Agency for Int'l Dev., 301 U.S. App. D.C. 327, 994 F.2d 874, 876 (D.C. Cir. 1993) and (Haines v. Kerner, 404 U.S. 519, 520, 30 L.Ed. 2d 652, 92 S.Ct. 594 (1972) also it is found in the U.S. Supreme court digest, lawyer's edition 130 Pro-se litigants Complaint. Can the "Relation back" doctrine be applied here is what Mr. Leonard is asking the court, see (Colby Dranoel Leonard v. Keith Deville 960 F.3d 164 U.S.C.O.A. (5-15-20). By the Louisiana State District Court not transferring Mr. Leonard's suit to the proper venue/jurisdiction like Federal District Court did. Holding it pass Mr. Leonard's 1 year prescribed as a pro-se litigant deprived Mr. Leonard of constitutional rights, United State Constitutional Amendment 7 and the United States constitutional Amendment 14 and Louisiana Constitution Declaration of Rights Article 1 § 16, Article 1 § 17 and Article 1 § 22.

Do joint tenancy contracts between the State of Louisiana Departments with a private management company outside the state violates the "Compact Clause," of the Constitution?

The Department of Public Safety and Corrections for the state of Louisiana ran by James Leblanc secretary partnered with Cranford Jordan Louisiana Sheriff Association in a joint tenancy

contract to hold prisoners sentenced to the Louisiana Department of Public Safety and Corrections at a Winn Parish jail. The Department and the Sheriff Association had a private management company operating the correctional facility, a foreign power whose headquarters is outside the state of Louisiana to operate under supervision of the Sheriff Association permitted by the Department of Public Safety and Corrections by secretary James Leblanc.

Do these actions of agreement violate the constitutions
"Compact Clause?"

Did congress at any point give consent to the State of
Louisiana Departments?

Years ago governor Bobby Jindal refused to make an agreement with President Barack Obama that left the State of Louisiana tapping into emergency funds before the British Petroleum oil spill in the Gulf of Mexico. The state transferred money from one department to another this way through funding the Sheriff Association dollars to operate prison facilities with state property prisoners to pocket money that should have been used to reform, program, rehabilitate with education and vocational skills as well equally in like circumstances. This prevented funds from being properly used from tax payers. The
"Compact Clause,"

"
NO STATE SHALL, WITHOUT THE CONSENT
OF CONGRESS... ENTER TO ANY AGREEMENT OR
COMPACT WITH STATE OR WITH A FOREIGN POWER"

Did the Louisiana Department of Public Safety and Corrections and Louisiana's Sheriff Association enter into a agreement with a private management company that turned out to be a foreign power? Did the private management company can be considered a foreign power being located outside the State of Louisiana? Let the United States Supreme Court decide whether or not the actions from the Louisiana Department of Public Safety and Corrections and the Louisiana Sheriff Association was in violation of the "Compact Clause" of the Constitution Art. I, Sec. 10, Cl. 3 and the 9th Amendment of the Constitution, the 10th Amendment of the Constitution and Louisiana Constitutional Declaration of Rights Article 1 and 1.

Is the Department of Public Safety and Corrections of the State of Louisiana and it's employees considered the "Reasonable Man," responsible for "Due Care" of prisoners in a joint tenancy contract?

Do the Court know only people convicted and sentenced to the death and hard Labor are committed to the department of Public Safety and corrections? With that a citizen becomes property of the state at another level as citizen with loss of liberty not Rights. Do the state of Louisiana at this point own Mr. Leonard as a convicted felon? Are the other branches of the state associated affiliated? Questions asked is because Mr. Leonard need the Court to know who is responsible for him as property of "the Reasonable Man," the individual or individuals employees of the State of Louisiana owing legal mandatory duty "Due Care". The "Reasonable Man," seem to be one who exercises as a member of society with his knowledge, intelligence, and judgement that society requires for their interest and the interest of other under given circumstances.

This individual or individuals indicates the standard of care and legal duty one owes to another by contract which establishes rights and duties making the bond civil a responsibility legally mandatory. This "Reasonable Man" had a responsibility legally owed to the public for it's safety and to citizens that broke the Law, yet though they still have rights. To the Public, the "Reasonable Man", owes safety so to convicted felons in prison programs, reform, rehabilitation, education and vocational skills are offered with the intent or structure to reform and rehabilitate drug users, drug dealers, thieves, robbers, and killers before they are allowed to re-enter society. Upon giving the opportunities in prison to citizens that are convicted for breaking the Law these opportunities should be given equally in like circumstances. This legal duty besides many more constitutional Rights are required and becomes "Due Care". The owner of the property or prisoners is required to establish such duty. When Mr. Leonard filed the complaint at it's lowest level he complained of being discriminated against and seek remedy of his equal protection of the Law. Mr. Leonard through court confronted the two branches of the State of Louisiana in a joint tenancy contract about who was the "Reasonable Man". The Department of Public Safety and corrections and it's employees, contractors, operating a private prison facility, it's employees, shareholders, directors, officers, and sheriffs and it's employees ~~and~~ and deputies.

These people affiliated are responsible for obligatory duties as well as the "Reasonable Man", who should answer for any constitutional violation. Operating as instruments of the state is Mr. James Leblanc secretary of the Department of Corrections, Mr. Cranford Jordan sheriff for the Louisiana Sheriff Association, Keith Deville warden at Winn Correctional Center and David Yount education Director at Winn Correctional Center. These are the individuals who intentionally neglected their duty, "Due Care" in corrupt actions.

These men boldly exercise malfeasance, official misconduct through negligence in conspiracy and fraud. which are criminal offenses. Their existing contract is the result of a TORT making "The Reasonable Man" a tortfeasor. These men in their positions within the departments of the State of Louisiana exercising as members of society with knowledge, intelligence, and judgement that society requires for society interest and the interest of others under given circumstances, they orchestrated a plot, a plan, a scheme to make money unjustly intentionally abusing their authority and neglecting the "Due Care" they legally owed to Mr. Leonard under authority of the State of Louisiana under Uniform of the Government. in a concerted action exercising criminal behaviors in a professional manner. These men obligated to doing and to refrain from doing something. The actions from these men of authority derailed the system from its design to reform and rehabilitate criminals for the safety of the Public and neglected their obligatory legal mandatory duties to distribute anything the state provide in like circumstances equally. The actions deprived Mr. Leonard of constitutional Rights of the 14th Constitutional Amendment, the 8th Constitutional Amendment and Louisiana Constitutional Declaration of Rights Article 1 and 3, Article 1 and 7, Article 1 and 12 and Article 1 and 20. Depriving Mr. Leonard of his "Pursuit of Happiness" and his "Personal Liberty." and "Individual Dignity"

When the state of Louisiana provides programs, reform, rehabilitation, education and job skills in prison, shall it be equally available to all prisoners in like circumstances?

when the "Reasonable Man" is responsible for "Due Care", within that obligatory responsibility there exists legal mandatory duties that do not provide deprivation of a person of their constitutional Rights. With these rights being legal mandatory duties the "Reasonable Man" should in his knowledge, intelligence and judgement assure that anything that the state of Louisiana provides in prison circumstances it should be distributed in accordance with the Laws of the Land and not outside of a citizen's constitutional rights. When the "Reasonable Man" joins a partner in a contract to become an employee, the employees agree to uphold the same "Due Care", obligatory legal mandatory duties no matter if the contractor is a shareholder or a private. In the joint tenancy contract the two become responsible to make sure all legal rights of the prisoner is given. Here in Mr. Leonard's situation as property of the state Department of public safety and corrections who contracted with the Louisiana Sheriff Association transferred Leonard to the Sheriff Parish jail that supposedly was to abide by basic jail guidelines and provide what was agreed to give prisoners programs, reform, rehabilitation, education and vocational skills certified by certificates that could prove that they are qualified productive members and can function within society safely with the Public. Mr. Leonard was deprived of his constitutional rights because the "Reasonable Man" owing "Due Care" failed in upholding his legal mandatory duty. Actions from the "Reasonable Man" and employees were discriminative not allowing Leonard to participate in state provided opportunities. These behaviors from authority were cruel and unusual, cold, harsh and oppressive lacking human kindness doing away with the constitution resulting to Leonard injury. depriving him of his Personal Liberty, Pursuit of Happiness, Constitutional Amendment 8, Constitutional Amendment 14, Louisiana Constitutional Declaration of Rights Article 2 and 3, Article 1 and 7, Article 1 and 12 and Article 1 and 20.

when society is threatened by criminals and the public is shocked by criminals, "citizens that break the Law," officials on state and federal levels work hard at protecting the public by punishment to those citizens from breaking the Law or when there is possibility that citizens convicted of crime may return to the Public after punishment for crime. The State and Federal government work on programs for reforming and rehabilitating these type of individuals for the safety of the Public through state opportunity offered throughout the prison correctional facilities. increasing prisoners through programs, education and vocational skills so that citizens that break the Law can return to the Public as productive members of society for the benefit of the public. This is required, it's in our performance of our most basic public responsibilities founding good behavior, character, values, education, skills and economic growth to our society. We know society grows increasingly complex and the Public's need for trained leaders increases correspondingly. Yet, when you prisoners with intent to meet those requirements that are hindered by imposed restrictions that produce inequalities taking away constitutional rights shows that the administration of the state and the federal government continue to fail citizens provoking citizens to think criminal accepting it's okay because those trusted to do the best in interest of the Public turn out to be corrupt where citizens began to embrace criminal behaviors which threatens the Public jeopardizing it's safety because the "Reasonable Man," with the knowledge, intelligence and judgement in position of the state representing the federal government possessing the trust of the Public owning "Due Care" owing legal mandatory duties to citizens continue to fail in upholding responsibility, violating the Constitution depriving citizens like Leonard of Constitutional Amendment 9, Constitutional Amendment 10 and Louisiana Constitutional Amendment Declaration of Rights Article 1 and 1.

CONCLUSION

Mr. Leonard is infact a prisoner of the Department of Public Safety and Corrections with a identification number 536844. The Department of Public safety and Corrections and Louisiana Sheriff Association are both employees of the State of Louisiana that came into an agreement in a joint tenancy contract the ended in the result of violating the United States Constitution and the Constitutional Rights of Mr. Leonard. It's clear through Mr. Leonard's approach through the Judicial procedure the court held the complaint for 2 years outside the 1 year federal limitation prescribed for civil suit complaints. The Federal District court showed how courts handle matters like that filed by Pro-se litigants by just transferring it to the proper venue/jurisdiction. Courts could have ordered lower courts in the State of Louisiana to do the same considering Mr. Leonard is a Pro-se litigant, instead court judicial handling of the Matter violated Mr. Leonard's United States Constitutional Amendment Rights and Louisiana's Constitutional Declaration of Rights. Further, it's clear inequalities existed within the administrations of the state exercise of their profession that led to multiple violations of the constitution. Their practices violated the property they owed "Due Care" to and jeopardizes the Public and it's safety by their hand of inequalities which led to the result of injury multiple ways to Mr. Leonard who now request \$2,000,000 (two-million dollars) in monetary compensation for court fees, cost of litigation, mental anguish, intentional infliction of emotional distress, negligent infliction of emotional distress, economic injury, legal injury for discrimination, deprivation of equal protection of Law, deprivation of Pursuit of Happiness, deprivation of Personal Liberty, deprivation of Access to Courts, deprivation of Individual dignity, deprivation of the purpose and orgin of government, deprivation of those rights

listed in the constitution that must not be construed in a way that denies or disparages unlisted rights which are retained to the people, and for violation of the powers they exercised that are not constitutionally delegated to the federal government nor permitted to the States, violating the listed constitutional and statutory provisions involved.

This is why the petition for writ or certiorari should be GRANTED!

Respectfully Submitted,

3-9-23 Cally ^{#536848} Leonard
Pro-Se

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