

22-7720

No. \_\_\_\_\_

ORIGINAL

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SUPREME COURT OF THE UNITED STATES

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FILED  
APR 03 2023

OFFICE OF THE CLERK  
SUPREME COURT, U.S.

Toni Marie Davis,

Petitioner,

VS.

UNIVERSITY OF MARYLAND, et al.

Respondent.

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On Petition for a Writ of Certiorari to the Supreme Court of Maryland,  
formerly called the Court of Appeals.

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PETITION FOR A WRIT OF CERTIORARI

Toni Marie Davis

Petitioner

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Friend of the Court

### Question Presented

Did the University of Maryland including Towson University break the laws of this great land by mandating/making a new law forcing their employees and students to tell their private medical information thereby invading their privacy as well as forcing them to get the experimental covid-19 vaccine. In order to go to their school, which by the way is not a private school it is a public university system that gets public tax payer's money.

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**Federal Law 18 U.S. Code § 241 - Conspiracy against rights**

**Harassment including Intentional conflict of emotional distress**

**Invasion of Privacy**

## Petition for Writ of Certiorari

I Toni Marie Davis, a citizen of the United States of America, respectfully petitions this court for a writ of certiorari to review the judgment of the Supreme court of Maryland.

### Opinions Below

The decision by the Supreme court of Maryland was made on and entered on January 24, 2023. That order is attached in Appendix A.

### Jurisdiction

My Appeal was decided on January 24, 2023. I Toni Marie Davis invoke this Court's jurisdiction under 28 U.S.C. S 1257, having timely filed this petition for a writ of certiorari within ninety days of the Supreme Court of Maryland's judgment.

## Constitutional Provisions Involved

### Constitutional Provisions Involved

#### Violation of the 14th Amendment of the United States Constitution

##### 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.

##### A) Articles 1-3: Branches, Checks, and Balances

The first three articles of the Constitution establish three branches of government with specific powers: Executive (headed by the President), Legislative (Congress) and Judicial (Supreme Court).

##### Article I, Section 1 of the United States Constitution States

Article I, Section 1, of the United States Constitution, provides that: All legislative Powers herein granted shall be vested in a Congress of the United States, which shall consist of a Senate and House of Representatives.

##### Federal Law 42 U.S. Code § 1985 - Conspiracy to interfere with civil rights

##### Depriving persons of rights or privileges

If two or more persons in any State or Territory conspire or go in disguise on the highway or on the premises of another, for the purpose of depriving, either directly or indirectly, any person or class of persons of the equal protection of the laws, or of equal privileges and immunities under the laws; or for the purpose of preventing or hindering the constituted authorities of any State or Territory from giving or securing to all persons within such State or Territory the equal protection of the laws; or if two or more persons conspire to prevent by force,

intimidation, or threat, any citizen who is lawfully entitled to vote, from giving his support or advocacy in a legal manner, toward or in favor of the election of any lawfully qualified person as an elector for President or Vice President, or as a Member of Congress of the

United States; or to injure any citizen in person or property on account of such support or advocacy; in any case of conspiracy set forth in this section, if one or more persons engaged therein do, or cause to be done, any act in furtherance of the object of such conspiracy, whereby another is injured in his person or property, or deprived of having and exercising any right or privilege of a citizen of the United States, the party so injured or deprived may have an action for the recovery of damages occasioned by such injury or deprivation, against any one or more of the conspirators. 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.

Federal Law 18 U.S. Code § 241 - Conspiracy against rights

U.S. Code

Federal offence

If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same; or

If two or more persons go in disguise on the highway, or on the premises of another, with intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured—

They shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if

such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, they shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death.

#### STATEMENT OF THE CASE

I filed my complaint on August 05, 2021 in the Circuit Court for Prince George's County. This case is about myself Toni Marie Davis being thrown out of Towson University because I refused to give my private medical information which is within my rights as an American and I refused to get an experimental Covid-19 vaccine. I sent the write of summons to the defendants. On 10/29/2021 I filed in the same circuit court a MOTION TO AMEND MY COMPLAINT. My amended complaint was denied on 12/16/2021. I then proceeded to wait for my first complaint to be ruled on. The circuit court never held a hearing or had a trial and issued an opinion and order on January 27, 2022. Closing the case for statistical purposes. I did not find that out until April 2022. I was calling the court every day and the clerk kept telling me that it could be a long time before the court ruled on my case, but that they would notify me by mail when the results were in so I stopped calling. When I called finally again in April because I was tired of waiting. The clerk informed me that my case had been closed. I was very upset because I knew that I had missed the deadline to appeal which I had every intention of doing if the case was closed in that court. I never received a letter or any kind of notice from the court that my case had been closed. The circuit court's order was never mailed to me. I never received it in the mail. The clerk in the lower court allowed me to appeal to The Court of Special Appeal's on May 13, 2022. Because I told her what happened and that I never receive anything from the court. The court of special appeals ultimately Ruled that I missed the Appeals date and so the court of special appeals dismissed my appeal. I then file a Motion to reconsider my appeal but it was denied. I humbly ask the highest court in the land to please here my case and to please side with me in my fight for justice in this case. The Attorneys for the Respondent/defendant are in full knowledge of this entire case and is not cooperating in any way with myself or the court I ask the court to please rule in my favor.

### Direct appeal

I renew my argument that I was kicked out of college because the college wrongfully listened to the President's unlawfully legislating from the Executive branch of the government. And I ask the court to please rule in my favor in this case. I went to Towson University for Molecular Biology. At the end of April 2021 University of Maryland and University Systems of Maryland and including its school Towson University, which I attended, because of and by the encouragement of the President and his mandates regarding the vaccines and mask, my school put a vaccine mandate in place where every student and employee must get vaccinated and then prove by opening their medical records to the school that they have been vaccinated. My now former school threatened and tried to pressure me, saying that I had not shown proof of vaccination and I only had until a certain date and then they would kick me out. They did in fact kick me out. I now Petition this great Supreme court and ask you to please make this wrong thing right and award me the victory in this case.

What this School has done, the way they have handle this situation has been wrong. I am not antivax I believe in vaccines, but these particular vaccines were put out to quickly for my liking, so I have decided not to get them. It is now April 2023 and I have never had Covid-19 and I do not wear a mask.

### REASONS FOR GRANTING THE WRIT

To avoid erroneous deprivations of rights, this Court should clarify who in the land has the right to make new laws in this great land called America. And to enforce the laws that have been outrageously broken by this president and his administration in an attempt to rule and rain as king in a land that has made sure through the Constitution and other laws of the land that we would never have a king. There are three branches of government for a reason.

In SUPREME COURT OF THE UNITED STATES, Nos. 21A244 and 21A247, NATIONAL FEDERATION OF INDEPENDENT BUSINESS, ET AL., APPLICANTS 21A244 v.

DEPARTMENT OF LABOR, OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION, ET AL. OHIO, ET AL., APPLICANTS

21A247 v.

DEPARTMENT OF LABOR, OCCUPATIONAL SAFETY AND HEALTH  
ADMINISTRATION, ET AL.

[January 13, 2022] Also including Cite as: 595 U. S. \_\_\_\_ (2022) 1. GORSUCH, J.,  
concurring SUPREME COURT OF THE UNITED STATES. Nos. 21A244 and 21A247  
NATIONAL FEDERATION OF INDEPENDENT BUSINESS, ET AL., APPLICANTS

21A244 v.

DEPARTMENT OF LABOR, OCCUPATIONAL SAFETY  
AND HEALTH ADMINISTRATION, ET AL.  
OHIO, ET AL., APPLICANTS

21A247 v.

DEPARTMENT OF LABOR, OCCUPATIONAL SAFETY  
AND HEALTH ADMINISTRATION, ET AL.  
ON APPLICATIONS FOR STAYS

[January 13, 2022]

The Supreme Court struck down President Biden's Mandate/law and said in so  
doing the following:

"Although COVID-19 is a risk that occurs in many workplaces, it is not an  
occupational hazard in most," the Court ruled. "COVID-19 can and does spread at  
home, in schools, during sporting events, and everywhere else that people gather.  
That kind of universal risk is no different from the day-to-day dangers that all face  
from crime, air pollution, or any number of communicable diseases."

"Court ruled that COVID-19 is not an occupational hazard but a 'universal risk'  
And the court said that President Biden and his administration needed to go  
through congress to make new laws he could not make them from the Executive  
Branch of the government".

ALSO

You're Honor's a State Supreme Court judge in Nassau County has ruled against Gov. Kathy Hochul's statewide mask mandate. In case Matter of Demetriou-v-New York State Department of Health. A New York judge struck down the state's mask mandate on Monday January 24, 2022, one week before it was due to expire, ruling the governor overstepped her authority in imposing a rule that needed to have been passed by the state legislature.

Judge Thomas Rademaker of New York State Supreme Court on Long Island found that the state legislature last year curbed any governor's ability to issue decrees, such as a mask mandate, amid a declared state of emergency.

Rademaker wrote that his ruling that "enacting any laws to this end is entrusted solely to the State Legislature."

Justice Thomas Rademaker said the rule amounted to "a law that was promulgated and enacted unlawfully by an Executive branch state agency, and therefore void and unenforceable as a matter of law."

Justice Thomas Rademaker also said "Commissioner Bassett and Governor Hochul must take their case to the State Legislature," he wrote.

Judge Thomas Rademaker ruled that Hochul's executive order was unconstitutional as it bypassed the lawmaking powers of the legislature.

#### CONCLUSION

For the foregoing reasons, I Toni Marie Davis respectfully requests that this Court issue a writ of certiorari to review the judgment of the Maryland Supreme Court. Please do rule in my favor and I thank you for your time and consideration in this matter.

DATED this 3rd day of April, 2023.



Toni Marie Davis

Petitioner

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