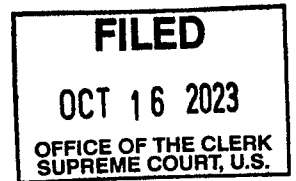


ORIGINAL

~~NO 23-5844~~

IN THE
SUPREME COURT OF THE UNITED STATES



Loretta Jean ALFORD — PETITIONER
(Your Name)

vs.

US Courts of Appeals for — RESPONDENT(S)
the District of Columbia

ON PETITION FOR A WRIT OF CERTIORARI TO

United States Court of Appeals for the District of Columbia
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Loretta Jean Alford
(Your Name)

15190 Brickwood Dr. #103
(Address)

Woodbridge, VA 22193
(City, State, Zip Code)

(703) 867-0411
(Phone Number)

°
|

QUESTION(S) PRESENTED

1. Under the Constitution the 14th Amendment it gives everyone equal protection of the law, so why am I required to comply with all federal rules and regulations and no one else?
2. Why has Loretta who's Black been denied Due Process by the Court System violating her Constitutional Rights without notice and a hearing with a witness or the opportunity to be heard?
3. Can a decision be rendered by any Federal Court without Due Process, and non-compliant to rules and regulations and still be unbiased at the same time?
4. Does the Federal Court Systems have authority to utilize both Rule 611 (Mode and Order of Examining Witnesses) and Rule 614 (Calling and Interrogation of Witness by Court) to stop the harassment against Ms. Alford's expert witness when involved in a court proceeding?
5. In the Fiscal Year 2022 Budget it indicated that the agency was settling a civil case. If this \$1.8 million wasn't for Ms. Alford, then who was it for? (The fiscal year has ended so where is this money)?

ii
LIST OF PARTIES

[] All parties appear in the caption of the case on the cover page.

[x] All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in this court whose judgment is the subject of this petition is as follows:

°Alford v. Merit Systems Protection Board, No. 2021-2151, United States Court of Appeals for the Federal Circuit. Decided March 11, 2022

°Alford v. Committee for Purchase from People Who Are Blind and Severely Handicaped, No. DC-3443-21-0448-I-1. Initial Decision June 30, 2021

TABLE OF CONTENTS

OPINIONS BELOW	1
JURISDICTION.....	2
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	3
STATEMENT OF THE CASE	4-5
REASONS FOR GRANTING THE WRIT	6
CONCLUSION.....	7

INDEX TO APPENDICES

APPENDIX A →	Loretta Jean Alford v. Jeffrey Koses, et. Al No. 23-5040, US Courts of Appeals for the District of Columbia Petition for rehearing denied July 17, 2023
APPENDIX B →	Loretta Jean Alford v. Merit Systems Protection Board No. 2021-2151, US Courts of Appeals for the Federal Circuit Decided March 11, 2022
APPENDIX C	Loretta Jean Alford v. Committee for Purchase No. DC-3443-21-0448-I-1 Decided June 30, 2021
APPENDIX D	
APPENDIX E	
APPENDIX F	

TABLE OF AUTHORITIES CITED

	PAGE NUMBER
CASES	
EEOC v. Didlake, Inc Case No. 8:23-cv-2618.....	4
Heart of Atlanta Motel, Inc. v. United States.....	4
Teamsters v. United States, 431 U.S. 324 (1977).....	Appendix B page iii
<u>Accardi v. Shaughnessy, 347 U.S. 260 (1954)</u>	Appendix C page IV
STATUTES AND RULES	
Javits-O-Wagner Day Act (41 U.S. Code 8501-8506).....	4
Rule 611(Mode and Order of Examining Witnesses)	Appendix A page ii, iii Appendix B page ii
Rule 614 (Calling and Interrogation of Witness by Court)	Appendix A page ii, iii Appendix B page ii
Title VII of the Civil Rights Act of 1964	Appendix B page iii
American with Disabilities Act of 1990.....	4
5 C.F.R. 1201.31.....	Appendix C page iii
12 C.F.R. 19.8.....	Appendix B page IV
28 C.F.R. 50.3-Section 602.....	Appendix C page iii
OTHER	
MSPB Judge's Handbook (Chapter 7-Request for Witness)	Appendix C page IV

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 B (page 1-5) to the petition and is

- ☒ reported at US Courts of Appeals; 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 C (pages 9-25) to the petition and is

- ☒ reported at Merit Systems Protection Board; 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 _____ 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.

JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was July 17, 2023.

☐ 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: July 17, 2023, and a copy of the order denying rehearing appears at Appendix A.

☐ 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 _____.
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).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

US Constitution 7th Amendment

Appendix A page ii

Appendix B page ii

Appendix C page ii

US Constitution 14th Amendment

Appendix A page ii

Appendix B page ii

Appendix C page ii

OTHER

MSPB Judge's Handbook (Chapter 7-Request for Witness) Appendix C pages iii, iv

STATEMENT OF THE CASE

I have filed this Petition for A Writ of Certiorari because I am Black and have faced several violations of my Civil Rights of Due Process.

History of the Committee for Purchase/Abilityone Commission

Under the Javits-O-Wagner Day Act (41 U.S. Code 8501-8506) that was passed by the 75th United States Congress in 1938 when there were no protections for Blacks which gave both this agency and Congress a sense of entitlement mainly for whites. This Act gives the authority to the General Services Administration for Human Resources and Personnel under Title 41 of the US Code 8502(i) specifically, for the Committee for Purchase operating as the Abilityone Commission. The Committee for Purchase/Abilityone Commission itself has terminated all of their own Black employees with Disabilities beginning in 2012 and has repeatedly refused to accommodate these people and refuse to rehire its disabled to include Ms. Alford. This is a program wide problem (EEOC v. Didlake, Inc Case No. 8:23-cv-2618) that violates the (American with Disabilities Act of 1990). This agency was created to support disabled people not discriminate and terminate them. The Fourteenth Amendment related decision in the 1964 case of Heart of Atlanta Motel, Inc. v. United States, the Supreme Court held that Congress could prohibit racial discrimination by private actors under the Commerce Clause which describes an enumerated power (United States Constitution (Article I, Section 8, Clause 3) paired with the Necessary and Proper Clause known as the Elastic Clause (Article I, Section 8 of the United States Constitution). The General Services Administration

has failed to provide any Human Resources Management Audits on any employees at any time as the Committee for Purchase/Abilityone Commission Human Resources and Personnel provider.

Ms. Alford has faced several challenges with the violation of her civil rights of due process because she is Black throughout the Court system from the District Court, Court of Appeals, and the United States Federal Courts. This case from the beginning was never adjudicated by the Merit Systems Protection Board against the Committee for Purchase which was the start of the Civil Rights Violation of Due Process to include failing to follow their own rules and regulations.

REASONS FOR GRANTING THE PETITION

I pray that this Petition for Writ of Certiorari is selected involving Constitutional Rights Violations along with Violations of the Code of Federal Regulations and to establish proper standards for the use of Rule 611 (mode and Order of Examining Witnesses) and Rule 614 (Calling and Interrogation of Witnesses by Court) by the Court System.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Loretta Jean Atford

Date: October 10, 2023