23-6138 ORIGINAL

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SUPREME COURT, U.S.

IN THE

SUPREME COURT OF THE UNITED STATES

John Doe — PETITIONER
(Your Name)

vs.

The Community College of Baltimore County et al. — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

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

PETITION FOR WRIT OF CERTIORARI

John Doe
(Your Name)

9012 Lennings Lane
(Address)

Rosedale, Maryland, 21237
(City, State, Zip Code)

410-686-3288
(Phone Number)

QUESTION(S) PRESENTED

1. Does Section 504 of the Rehabilitation Act prohibit federally funded colleges from forcing students off campus for being mentally ill?
2. Does the prohibition of retaliation under Section 504 of the Rehabilitation Act apply to defamatory statements made against a litigant of a protected class?
3. Is the Fourth Circuit Court of Appeals permitted to unpublish opinions so that they may output low quality judgements to avoid alerting the public with a widespread precedent?
4. In the event the Petition for Writ of Certiorari is granted, does Rule 28.8 in the Rules of The Supreme Court violate the Equal Protection Clause of the Fourteenth Amendment?
5. Is Petitioner entitled to file under a pseudonym based on his status of being "mentally ill" and the related defamatory attacks from Respondents?

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 the court whose judgment is the subject of this petition is as follows:

The Community College of Baltimore County;

Richard Lilley, Vice President of Enrollment and Student Services;

Scott Eckhardt, Director of Student Conduct and Title IX Coordinator;

Eric Washington, Student Conduct Administrator;

Sarah Morales, CCBC Philosophy Coordinator of Essex & Dundalk Campuses;

Public Safety Office

RELATED CASES

Doe v. Community College of Baltimore County et al, No. 1:2019cv02575, U.S. District Court of Maryland. Judgement entered August 25th, 2020

Doe v. Community College of Baltimore County et al, No. 21-1559, U.S Court of Appeals for the Fourth Circuit. Judgement entered June 8th, 2023

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STATUTES AND RULES

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 A 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 B to the petition and is

[✓] reported at JU 4.15 Judicial Publications; 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 June 8th, 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: _____, 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. § 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).

STATEMENT OF THE CASE

The Community College of Baltimore County (CCBC) profiles its mentally disabled student population in response to the sensationalism of school shootings. The college employs a Student Incident Report (SIR) tool, which sends a digital report to the college's Office of Student Conduct, to keep tabs on their mentally ill students. Faculty and staff are instructed by the college's administration to submit SIRs whenever they discover a mentally disabled student's disability status and their symptoms.

CCBC has previously displayed their presumption that violent individuals can be 'diagnosed' by a psychologist after they permanently barred a veteran from stepping on college premises in the year 2010. College administrators were documented in news articles to have called a meeting with the veteran, where they "kept bringing up the Virginia Tech shooting", after they read the veteran's essay on his experiences serving in the Iraq War. The administration concluded that he needed to submit a psychological evaluation by a licensed professional to them in order to have the No-Trespass Order rescinded.

Petitioner was subjected to similar animosity in 2014, where after being admitted to Franklin Square Hospital's Adult Psychiatric to be treated for his suicidal thoughts, his Physical Education instructor filed an SIR to the Office of Student Conduct; relaying the information Petitioner provided to the instructor regarding his condition and hospital visit. The Student Conduct Director, Scott

Eckhardt, called Petitioner in for a meeting to pry into information about his condition, the visit he made to the hospital, and what sort of treatment he may or may not have been receiving. Eckhardt ended the meeting saying that the purpose of the conversation was to make sure Petitioner did not pose a threat to the campus's safety since "people like [him]" have caused massacres such as the Virginia Tech Shooting.

In the 2016 school year, Petitioner attended the Philosophy 101 course of Professor Sarah Morales, the Philosophy Club, and Morales's office hours. Petitioner would receive email confirmation and approval for most of his visits to Morales's office hours while also respecting the times when she'd report being unavailable. Neither Morales nor any of Petitioner's peers ever made any reports about Petitioner to the college administration or the Public Safety Office throughout the spring and summer semesters.

At the start of the Fall 2016 semester, Petitioner wished to express concerns he had regarding Morales and the Philosophy Club. After a miscommunication about Morales's office hours and Petitioner describing her carelessness as 'unprofessional', Morales lashed out at Petitioner for his choice of words and did not want Petitioner to discuss Philosophy Club matters during her office hours. Petitioner sought an inquiry with Morales's supervisor for resolution of the matter the next morning by asking Morales for the supervisor's contact information. Morales told Petitioner to "have a seat" in her office and she immediately pressed Petitioner over his description of her being 'unprofessional.' Morales's anger and

livid demeanor made Petitioner upset, and as a way to defuse the situation, he confided that he had Major Depressive Disorder, Social Anxiety Disorder, thoughts of suicide, and that he was alone at home with the only other family member being away on a business trip. Morales, following college policy, completed an SIR under the label of "Mental Health Services" and wrote in the description:

> *"Philosophy club student came to my office reporting depression/anxiety, general (non-specific, no plans) thoughts of suicide, and general emotional instability. I helped him make an appointment for next Tuesday (9/13) with the therapist previously referred to him by the CCBC mental health navigators, and gave him information about the Sheppard Pratt crisis center. He has told me he intends to use these services if necessary, has requested no further intervention, and told me that he has no specific plans or immediate intentions to harm himself or others."*

The Student Conduct Administrator, Eric Washington, learned about Petitioner's mental disabilities after reading Morales's SIR and listening to a voice mail she left on his phone concerning the SIR. Washington persisted on meeting with Morales even after it was made clear in an email exchange that she felt "the issue's under control."

Morales also spoke to the college's Public Safety officers in person to report Petitioner's mental illnesses. The Public Safety officers began fishing for any problems they could extract concerning Petitioner. Even after rebutting their questions about whether Petitioner would "hurt others or himself at anytime *[sic]*", the officers still went to the offices of CCBC's mental health navigators, that was previously mentioned in the SIR, to acquire any information regarding Petitioner's mental health. CCBC's mental health navigators serve as a replacement for the

college's defunct counselling center, which had HIPPA privacy protections for such sensitive medical information. The mental health navigators replaced the licensed counselors as the point of contact for students having mental health struggles, and any such personal conversations with the mental health navigators now no longer carry the same privacy protections that HIPPA provides.

According to an email written by Morales's supervisor on September 12, 2016 at 2:49 P.M, in response to Eckhardt concluding that Petitioner violated none of the college's policies, the supervisor wrote that Eric Washington informed Morales that **Petitioner was removed from the college's premises due to Morales's SIR labeled "Mental Health Services" that was previously mentioned above.** Morales herself even chimed into the same email conversation by clarifying some erroneous information regarding whether Petitioner's mother spoke to Eckhardt or her. Notably, Morales offered no correction to the statement that was made regarding Washington's motive for banning Petitioner from all of the college's premises for four days with a No-Trespass Order and performing a weapon search on Petitioner and his belongings. Washington and Eckhardt were also participants in the private email conversation and likewise, never disputed this statement regarding their motivations.

Throughout the proceedings in the lower courts, the investigation conducted by the Department of Education's Office of Civil Rights (OCR), and the events leading up to the initial OCR investigation, the college and its employees offered

numerous ever-changing explanations for their overzealous response to the Mental Health Services SIR; many of which were evidently false:

1. Petitioner was verbally told by Washington during service of the No-Trespass Order that the college deemed Petitioner to be a threat to the campus's safety. Washington also repeatedly declined to mention any specifics or reasoning regarding this decision during the particular interaction.
2. In an in-person conduct hearing with Petitioner and Petitioner's mother, Eckhardt said that Morales "needed personal space" and felt that Petitioner was "crossing the student/teacher boundary" in a more intimate way; citing an email sent on June 30th, 2016 which Petitioner wrote "I hope you're feeling okay, and I hope that nothing bad has happened" to Morales after she did not show up to her office hours.
3. Washington, in his interview with OCR, said the extreme four-day ban was implemented because Petitioner didn't have any classes on the Thursday evening or following day; arguing that it wouldn't have been implemented if he did have classes. Petitioner's course schedule for the Fall 2016 semester establishes that he did, in fact, have courses scheduled during these times and was forced to miss them due to the college's No Trespass Order.
4. The college's Public Safety Office wrote a series of allegations in a report that it was due to Petitioner describing Morales as unprofessional,

"[challenging] her knowledge of what her degree was in", and telling her that she tells students in the clubs wrong information – all of which and more the college grossly mislabeled as "harassing/threatening behavior towards an instructor."

5. The college's legal representatives argued, in bad faith, that various defamatory and salacious rumors contributed to Petitioner's removal from the college's campuses that involve unfounded stories of egregious accusations, such as Petitioner allegedly distributing material pertaining to bestiality. Such hearsay was documented to have first come to the college's attention in an email sent two hours *after* Petitioner had already been forced off campus. Neither the college nor their attorneys ever made an attempt to further investigate such outlandish claims, let alone even reach out to Petitioner for his comment, prior to rushing them to OCR investigators.

Petitioner pursued the matter with the Department of Education's OCR after it became clear the college was stonewalling Petitioner from learning more information about their decision to trespass and weapon search him. OCR investigators opened a case looking into the same subject matter as presented here in this petition. They determined that because the college receives federal financial assistance from the Department and is a public entity, while also taking Petitioner's complaint at face value, CCBC would be in violation of Section 504 of the

Rehabilitation Act of 1973 and Title II of the Americans with Disabilities Act of 1990 under the allegation that:

1. *"The College discriminated against Complainant on the basis of disability when he was reported to the Department of Safety, subjected to a personal search, and banned from campus for four days, after he disclosed that he had depression."*

The Office of Civil Rights concluded their investigation declaring that the mental health report about Petitioner and the conduct hearing were not related. Petitioner received documentation from OCR under the Freedom of Information Act (FOIA) and uncovered key facts that were completely omitted from OCR's fact finding portion of their report:

a. In Eckhardt's email to Morales conveying the outcome of the disciplinary case involving Petitioner being forced off campus and weapon searched, the title of this email contained "RE: [Maxient] IR #00003043 Mental Health Services", and the IR number included matches exactly with Morales's SIR concerning Petitioner's depression and anxiety. This email also contains the same SIR as an attachment.
b. Eckhardt stated in email that he would "complete this case" by altering the title of Morales's SIR from being "Mental Health Services" to an innocuous "FYI" label because he believes Petitioner did not commit a conduct violation.
c. Eckhardt exchanged Morales's SIR about Petitioner via email with the director of the mental health navigators, Heather Griner, and stated that the two of them would be opening a new case.

d. College policy conflicts with the college's multiple excuses for their extreme behavior, as they have provided no reasonable justification explaining why Petitioner needed to be forced off campus for four days.

e. Eckhardt, in his OCR interview, asserted numerous times in great detail that there was a second SIR bearing an "FYI" title that had never been seen before. He alleged it was submitted by Morales detailing that she was "being harassed by emails." Eckhardt's excuse to explain the lack of evidence for this second SIR's existence was that it was "deleted from [their] system" and that the report was "shredded." About three hours after the interview, the college's attorney reached out to OCR on behalf of Eckhardt to retract all claims he made regarding this elusive second SIR, and confirmed that there was only one SIR ever made regarding the matter, in reference to the Mental Health Services SIR.

f. In an interview with a public safety officer, the officer repeated a narrative that Petitioner was "explained everything in detail" regarding why he was being forced off campus. Such alleged explanations given to Petitioner at the time included threatening behavior, "him being aggressive, belligerent, belittling the instructor, [and] making her feel uncomfortable." The officer also insisted that she remembered giving Petitioner two forms during this encounter with one being known as a 'code of conduct form' containing these allegations. After the college's representative attorney interjected in the interview, the OCR investigator temporarily stopped transcribing the

conversation, and by the time they resumed, the officer had been seemingly struck with instantaneous memory loss of the event she was talking about. This *conspicuously-timed occurrence* caused the officer to change her answers to "I don't recall giving him anything" and saying that she doesn't recall Petitioner being told he was a threat.

Despite the overwhelming evidence demonstrating the link between Petitioner's disability status and the college staff's mistreatment of him, or the numerous examples of college staff being deceptive and offering pretext to the investigators and Petitioner, the investigators declared that they did not find any evidence demonstrating unlawful discrimination. They carved out all of the crucial facts and discrepancies that established a causal link between banning Petitioner from campus and his status of being mentally ill. OCR noted in their findings that Petitioner could reach out to the OCR investigator if he had any questions. After Petitioner sent one email asking a few questions that were critical of OCR's investigation, the OCR investigator, Andrea DelMonte, refused to answer any more questions after passing responsibility onto her team leader, Melissa Corbin. Corbin also insisted that she was not answering any questions contrary to what was written in the OCR report.

Petitioner filed his initial lawsuit in the United States District Court of Maryland on September 6th, 2019 under the pseudonym "John Doe" asserting that CCBC's actions violated Section 504 and the retaliation clauses. To this day, the

pseudonym remains in place after the motion to proceed under pseudonym was denied as moot since there was not an accompanying order to unseal his unredacted complaint

The district court dismissed Petitioner's suit by arguing "CCBC offered a nondiscriminatory reason for temporarily banning him from campus: "harassing/threatening behavior", and just like in the OCR investigation, omitted numerous key pieces of evidence crucial to Petitioner's argument. This time however, the district court never even bothered to acknowledge the existence of the Mental Health Services SIR like the OCR investigators did. The district court, consequently, misapplied a case precedent involving Section 504 being invoked after a disciplinary proceeding was handed down in response to offending conduct, when this case pertains to a college solely using a student's disability status to force the mentally disabled student off campus, then invent an excuse later on to act as a smokescreen for the discriminatory act.

Petitioner filed a motion to reconsider with the district court, highlighting that the Court left out important information to Petitioner's case and wrongly reported Petitioner's arguments, among which involved the Court's omission of the Mental Health Services SIR being attached to several emails and documents regarding the college's disciplinary matter. Petitioner even pointed out that college staff admitted that their actions were motivated by the Mental Health Services SIR. The Court acknowledged that all of this information was already presented, that Petitioner did not raise any new arguments, and once again refused to even repeat

such crucial information in his ruling to dismiss Petitioner's motion to reconsider. The district court also stated they did not consider the fact that if Petitioner truly didn't have a case, OCR would not have opened an investigation in the first place.

After an appeal to the Fourth Circuit Court of Appeals raising the same issues and waiting nearly two years, Petitioner received a generic, one-paragraph per curium response from the panel of judges concluding they found "no reversible error" without any specific rationale.

REASONS FOR GRANTING THE PETITION

Petitioner is left with no others options in his efforts to have his rights protected. In sum, this petition is asking the highest court to put a stop to the lower courts' Orwellian "Ministry of Truth" style of operation – where instead of making decisions based on the merits and applicable laws, they are decided based on fake facts, applying laws that have no relevance to the truth of the matter, and then rejecting the appeal based on the fake facts.

1. A Misapplication of Case Precedent

The district court acknowledged that in considering a Rule 12(b)(6) motion, a court must examine the complaint as a whole, consider the factual allegations in the complaint as true, and construe the factual allegations in the light most favorable to the plaintiff. Albright v. Oliver, 510 U.S. 266, 268 (1994); Lambeth v. Bd. of

Comm'rs of Davidson Cty., 407 F.3d 266, 268 (4th Cir. 2005) (citing Scheuer v. Rhodes, 416 U.S. 232, 236 (1974)). The court also acknowledged that *pro se* complaints are entitled to special care to determine whether any possible set of facts would entitle the plaintiff to relief Hughes v. Rowe, 449 U.S. 5, 9–10 (1980). Despite this acknowledgement, the court actually construed the factual allegations solely in the college's favor and wrongly applied case precedent to their spliced version of events. The precedent that was applied centered around the question on when Section 504 protections could be invoked after a disciplinary proceeding, especially when the misconduct in question has already occurred so that it could be determined if the misconduct is a manifestation caused by a mental disability in Mason v. Bd. of Educ., No. WMN-10-3143, 2011 WL 89998, at *3 (D.Md. Jan. 11, 2011).

However, Petitioner's case does not involve such precedent, because what Petitioner has reported to the court is a story where officials are already hysterical about the possibility of a student with a mental illness will attack the college in a similar manner Virginia Tech was, so when Eric Washington became aware of an SIR detailing Petitioner's mental disabilities, his only thought was that he had to force Petitioner off campus, and then later come up with a pretext to serve as a smokescreen to hide his real motivations. Washington did so fully aware that Petitioner was having suicidal thoughts and that there wasn't anyone else living at Petitioner's home at the time. There was a clear risk that Petitioner could have

committed suicide during his banishment alone and isolated while cutoff from his peers, and the college administration did not care in the slightest. After Petitioner attempted to expose the college's profiling scheme, the college has been doubling down time after time in their mischaracterizations of Petitioner's character and behavior as an act of revenge for asserting his rights and to make the case more complicated than it needs to be. Petitioner was considered to be in good standing with the college until the Mental Health Services SIR was sent to the Office of Student Conduct, and that marks the point when the college essentially launched a smear campaign against Petitioner in an effort to save themselves from being held accountable under the law.

There have been case precedents that strongly lean in Petitioner's favor. O'Connor v. Donaldson, 422 U.S. 563 (1975) decided that

> *May the State fence in the harmless mentally ill solely to save its citizens from exposure to those whose ways are different? One might as well ask if the State, to avoid public unease, could incarcerate all who are physically unattractive or socially eccentric. Mere public intolerance or animosity cannot constitutionally justify the deprivation of a person's physical liberty. See, e.g., Cohen v. California, 403 U. S. 15, 403 U. S. 24-26; Coates v. City of Cincinnati, 402 U. S. 611, 402 U. S. 615; Street v. New York, 394 U. S. 576, 394 U. S. 592; cf. 413 U. S. S. Dept. of Agriculture v. Moreno, 413 U. S. 528, 413 U. S. 534.*

While it's clear from the evidence that CCBC decided to remove Petitioner from campus due to his status of being "mentally ill", even their pretext excuses of accusing Petitioner of allegedly being "odd", "erratic", or even challenging a college professor's knowledge does not justify a complete banishment from all of their premises.

When the Court is allowed to invent whatever narrative it wants to regardless of the facts and the law, litigants expected to overcome the infinitely high barrier of a judicial system that guts the truth out of a plaintiff's suit like a fish so that the truth gets buried, the criminals go unpunished, and nothing is stopping these issues from arising again. It has, quite frankly, been impossible for Petitioner to receive a fair and impartial hearing from the United States, because every time this matter was brought before a reviewing body, they have either manufactured whatever story it took to justify a dismissal, or have rubberstamped dismissals using a generic template without any indication that a human being read it.

It is understandable that federal justices in the US have been burdened by heavy caseloads in recent years, but such brazen attempts to bulldoze valid lawsuits into the trashcan is ***not*** the solution. I find it hard to believe that the lower courts believe that dismissing a valid suit against CCBC will deter them from targeting mentally disabled students? To the contrary, they should understand that such verdicts have only *emboldened* such disgraceful behavior from college. Just look at how they have responded in court documents when confronted about their mistreatment of Petitioner:

> *"This matter is the latest installment in the saga of John Doe's ("Appellant") unsuccessful attempts to portray his temporary removal from campus, for exercising alarming behavior targeted at a former professor, as disability discrimination in violation of Section 504 of the Rehabilitation Act."*

They act like schoolyard bullies, and so far, they've clearly shown that they have no respect for any aspect of the US judicial system since no one has been holding them to any standards. The lower courts have handed them a "Get Out of Jail Free Card" and now they're taking the opportunity to turn these proceedings into a complete farce. When a valid lawsuit such as this is wrongly dismissed, it only allows criminal activity to flourish; leading to this one case to multiply into tens, if not hundreds, of other cases of people being victimized by the hand of a federally funded entity.

Is the judicial system going to also bury the other valid lawsuits filed by CCBC's victims? Just let the balloon grow until it "pops"? Some of the 40 gymnasts that were sexually assaulted at the hands of Larry Nassar could have been spared if authorities responded to the reports of his victims. What good could ever come out of helping CCBC bury this scandal? Why not simply remand it back down to the district level and tell the lower court that they cannot ignore **the fact that a college employee sent an email confirming that Petitioner was forced off campus because of a report about his mental disabilities**? Permitting such behavior only rewards the liars and criminals that abuse their army of lawyers to circumvent the law, while simultaneously punishing the victims for trying to resolve the matter in the courts.

Throughout these proceedings, Petitioner had to endure being publicly tar and feathered by the college and the lower courts with slander that they knowingly had all context siphoned out to deceive the general public. In the most glaring

example of this, Morales gave Petitioner and his partner an assignment on how the human brain's neurology correlates to violent/criminal behavior, and even referred him and his partner to articles exploring the how related brain neurology is to criminal behavior. The college argued that it was "alarming" and "unusual" for Petitioner to have completed the assignment, and the district court joined in by labeling it "odd", despite the fact that Petitioner and his partner would've failed the assignment if they did not do this assignment.

Why would anyone in good faith conclude that it was "odd" for Petitioner to have made thought experiments about acts of murder during an assigned academic presentation that involved the topic of murder? No reasonable person would have concluded that it was alarming, disturbing, threatening, or any of the other overzealous descriptions the college and the district court used when describing this event. They both also have wrongly claimed that Petitioner has "admitted" to engaging in the activity, when it has been plainly obvious that Petitioner has been refuting their stories because they continue to omit crucial details and context in order to make it sound random, "alarming", "odd", etc.

The worst part about it is that they know they've been misrepresenting Petitioner's arguments and simply don't care, especially since Petitioner, at this point, doesn't have a *right* to have any of this reviewed by a judicial body. They can comfortably assume that Petitioner has been thrown to the wolves and that there's a 99% chance that the only ones who are vested with the power to do something will only choose to shrug it off and expect the Petitioner to figure out how to deal with

the judicial system's willful ignorance to his suffering by sticking with their "official" narrative of events and wrongly staple obscene topics, like bestiality and murder, onto Petitioner's identity.

The Supreme Court of the United States' approval rating is at an all-time low and it isn't hard to see why. It isn't far-fetched to see how the lower court's behavior in this case threatens the judiciary's reputation as a whole and turns the courts into highly-partisan ones that are no better than the ones in North Korea. Petitioner *begs* and *pleads* with the highest court in our nation to intervene in a case that has been corrupted by people that are willing to say whatever it takes to get a case off of their desks. It is dreadful to think that this matter will be passed up in favor of a case that centers around forcing a baker to provide cake, but it would be a sad commentary regarding what the country's justice system is prioritizing: A litigant wanting cake over a litigant that has lost a job because of a college's prejudice towards the mentally ill.

The United States is becoming increasingly paranoid and hysterical surrounding the question on how society can potentially prevent mass shootings, and CCBC's witch hunts of the mentally ill aren't the solution. This matter involves a *tough* subject matter for sure, but who is better suited to address this than The Supreme Court of the United States itself? Many studies in recent years have revealed that more than 50% of students in school report having mental health struggles, and they need a figure of authority to intervene and reprimand colleges like CCBC. They need to be told point blank that it is illegal and harmful to treat

their mentally ill students like criminals and then slander them out in public when their mistreated students try to hold them accountable, because as of now, the reviewing bodies that *should* have been impartial have only helped CCBC cover up their profiling scheme by putting in extra work to bury the truth rather than simply recognizing it, and that's scary.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

John Doe

Date: November 11th, 2023