"Equal Justice Under The Law"
"DIA's Admin Judge's Failure to Postpone Clearance Hearing Long Enough For Me To Get A Lawyer, And DIA's Admin Judge's Failure To Consider My Legitimate Discrimination and Retaliation Concerns in the Clearance Revocation Hearing are both wrongful and illegal"
"MDA's Adverse Actions Are All A Pretense For Employer Discrimination"

No. 23-6373

ORIGINAL

SUPREME COUR

CHARLES D. ADAMS,
Petitioner

VS.

DEPARTMENT OF DEFENSE,
Respondent

On Petition for Writ of Certiorari to the
United States Court of Appeals for the Federal Ci

PETITION FOR WRIT OF CERTIORARI

Charles D. Adams, CISSP
Pro Se Petitioner
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Herndon, VA 20171
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QUESTIONS PRESENTED

Whether CAFC made an error in their decision to dismiss CAFC 2023-1678 (DC-3443-18-0288-I-1) which was about DIA's Admin Judge's Failure to Postpone Clearance Hearing Long Enough For Me To Get A Lawyer, And DIA's Admin Judge's Failure To Consider My Legitimate Discrimination and Retaliation Concerns in the Clearance Revocation Hearing, And whether Employer Discrimination is going to be allowed to flourish in the Department of Defense (DoD) and the Missile Defense Agency (MDA) and the Defense Intelligence Agency (DIA). And whether CAFC Violated Constitutional Law when they failed to address the discrimination by MDA and DIA.

Whether anyone or any organization can deny access to EEO records in a Discrimination Case, Complaint or Appeal. And whether MDA can intentionally withhold vital evidence they have in their possession that would change the outcome of the CAFC decision, such as the H: harddrive containing dates, times, and people for numerous instances of disparate treatment, discrimination and retaliation, the EEO records of the discriminators and the EEO records of the discriminating organization, and The FBI investigation that cleared Mr. Adams of any wrongdoing.

Whether CAFC can deny an Oral Argument Request for a case of this magnitude and have justice prevail. And whether Mr. Adams' Sixth Amendment Rights were violated when CAFC disregarded/ignored his request for an oral argument, in effect, denying him of his right to be heard, and denying him of his right to face his accuser.

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NOTE ON MISSING EVIDENCE

CAFC did not have access to vital evidence when they made their decision. So it is imperative that you consider, subpoena if necessary, the evidence that was never provided to them, evidence that would have changed their decision! **Mr. Adams' Pentagon Drug Tests** (that were supposed to be Random but weren't) and who requested them (whether MDA tried to cover-up their discrimination by trying to create a drug motive). **Mr. Adams' FBI Investigation** (the one MDA ignored because they didn't like the results that cleared me before proceeding with their own in-house investigation with the predetermined outcome they wanted). **Mr. Adams' Unclassified Personal Harddrive or H: Drive** containing 6 years and 6 months of daily emails and weekly documentation regarding MDA, Unlawful Termination, Prohibited Personnel Actions, and other Disparate Treatment, Disparate Impact, Discrimination and Retaliation I was subjected to while working at MDA. **The EEO Records Of The 3 Discriminators** (Michael Waschull, Douglas Clover and LtG Patrick O'Reilly) and **The EEO Records Of The MDA Organization** (including the EEO records from the WHS who processed MDA EEO complaints during the time I worked at MDA before MDA brought their EEO process in-house to better control and conceal their EEO complaints).**There has never been a discrimination case where the EEO records were never even examined!**

NOTE ON DOD'S DISCRIMINATORY CLEARANCE SYSTEM AND MDA'S EMPLOYER DISCRIMINATION

DoD's Clearance System is Discriminatory and Must Be Fixed. It Allowed Mr. Waschull and MDA to use the Discriminatory Clearance System to revoke ALL of my clearances instead of just revoking SCIF Access, in order to terminate me and prevent me from getting another job in DoD or the US Government Civil Service! **And MDA's Adverse Actions against Me And Others are Pretexts For Employer Discrimination.** It Allowed Mr. Waschull and MDA to pull me back from a competitively-selected Pentagon Comptroller's job after they had formally released me and after I had already started working at my new job, and allowed them to orchestrate a second biased espionage investigation using their own people with a predetermined outcome after the first FBI investigation cleared me of any wrongdoing, among many other adverse actions! **Finally, MDA and DoD too often failed the people it's meant to serve, as is my case of employer discrimination!** MDA and the DoD Clearance System is full of well-documented inequality and racial disparities and no one is doing anything about it! I would hope that instead of being another iron in the fire, my case would be the straw that breaks the camel's back and enables the change necessary to stop and repair the egregious acts of racism and discrimination in MDA and the DoD Clearance System!

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PETITION FOR A WRIT OF CERTIORARI

Petitioner Charles D. Adams, CISSP respectfully requests the issuance of a writ of certiorari to review the judgment of the US Court of Appeals for the Federal Circuit below.

DECISION BELOW

[X] For cases from **federal courts**:

The opinion of the United States court of Appeals for the Federal Circuit appears at Appendix A to the petition and is
[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[X] is unpublished.

The opinion of the Merit Systems Protection Board (MSPB) appears at Appendix B to the petition and is
[ ] reported at _____; or,
[ ] has been designated for publication but is not yet reported; or,
[X] is unpublished.

[ ] For cases from **state courts**:

The opinion of the United States court of Appeals for the Federal Circuit 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 Merit Systems Protection Board (MSPB) 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

[X] For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was May 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: _____, 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. _____.

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. _____.

The jurisdiction of this Court is invoked under 28 U.S.C. §1257(a).

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FEDERAL RULE INVOLVED

Constitution Amendments dealing with Equal Employment Opportunity, Presidential Powers and Presidential Waivers, Unconstitutional Laws and Powers, Unconstitutional Behavior, Constitutional Law, Ethics and Retributive Justice, Due Process clause of the 14th Amendment, Civil Rights, Race Discrimination, Abuse of Power (Authority) and Age Discrimination, Segregation, Jobs and Employee Rights and "Right to Work" Laws, Government Reform, Pro Se Legal Representation Reform, Compensatory and Punitive Damage Caps, Treatment of Veterans, Cover-Ups, etc.

Title VII of the Civil Rights Act of 1964 prohibiting employment discrimination based on race

Age Discrimination in Employment Act prohibiting employment discrimination based on age

Constitutional Amendment 1 prohibiting the free exercise of people to petition the Government for redress of grievances. MDA is trying to abridge my right by implementing several conflicts of interest and cover-ups, by stopping my paycheck during the appeal process and before I was even found guilty in the hope of forcing me to quit when my savings ran out (they should have let me remain on admin leave instead of suspending me without pay until the conclusion of the appeal process and determination of my guilt or innocence), and threatening to terminate me if I don't drop my appeals.

Constitutional Amendment V stating that no person will be deprived of liberty or property without due process. MDA is constantly trying to deny me my due process by implementing several conflicts of interest and cover-ups, by stopping my paycheck during the appeal process and before I was even found guilty in the hope of forcing me to quit when my savings ran out (they should have let me remain on admin leave instead of suspending me without pay until the conclusion of the appeal process and determination of my guilt or innocence), and threatening to terminate me if I don't drop my appeals.

Constitutional Amendment VIII prohibiting cruel and unusual punishment. Stopping my paycheck during the appeal process and before I was even found guilty is cruel and unusual punishment (especially for a first offense where no damage was done). Also terminating me if I don't drop my appeals and causing me to lose my health care (when I have 2 uninsurable dependents – son is autistic and wife has history of cancer) is cruel and unusual punishment (especially for a first offense where no damage was done).

Executive Order establishing Presidential Waiver for the Missile Defense Agency to do whatever is necessary regardless of the law in order to stand up a missile defense system as soon as possible.

8 COURT CASES SUPPORTING THIS APPEAL

1. **Romero v. Department of Defense, C.A.F.C. No. 2007-3322, 6/2/08.**

   An auditor with the Inspector General for the Department of Defense, fired for losing his security clearance, has won a reprieve from the appeals court. (Romero v. Department of Defense, C.A.F.C. No. 2007-3322, 6/2/08). Romero's position had required a Secret clearance. Then, Romero's boss asked that Romero be cleared for SCI (Sensitive Compartmented Information) so that he could do audit work at the National Security Agency. He was denied this clearance upgrade and the denial was affirmed following an administrative hearing within DOD. At this point the agency revoked Romero's clearance and removed him as a result (Opinion pp. 2-5). Romero took his case to the Merit Systems Protection Board where he argued he was denied due process when the agency revoked his existing clearance based on the agency's refusal to upgrade his clearance to SCI. The MSPB Administrative Judge found that the clearance had been revoked, that Romero's job required access to SCI and to classified information, and that DOD had met the requirements of the law in denying his clearance. In short, the MSPB sustained Romero's removal (pp. 4-5). Romero then took his case to the Federal Circuit Court of Appeals. In its decision, the court points out a removal based on denial of a security clearance "does not require the agency to prove that the reasons for its decision...are supported by a preponderance of evidence." (p. 5) However, since the MSPB did not consider whether DOD had followed its own regulations in revoking Romero's clearance, the court vacated the Board's decision and remanded the case "for the Board to determine whether Mr. Romero can show that the Department failed to follow its procedures and that any failure to do so resulted in harmful error." (p. 11). The effect of this decision is to give Romero another shot at overturning his removal when he goes back before the MSPB.

2. **Deirdra Brown-Fleming v. Attorney General, EEOC Appeal No. 0120082667 (October 28, 2010) won by Passman & Kaplan, P.C. law firm.**

   Both cases (hers and mine) involved government workers alleging discrimination and reprisal against their government employers. Both had nothing to do with performance and everything to do pretexts to discrimination, in my case a single incident blown way out of proportion in order to get rid of me. Both complainants asked for reinstatement, a clean record, back pay and benefits, mandatory training to staff [management] at the agency facility, consideration of "taking appropriate disciplinary action against all responsible management officials still

employed with the agency," compensatory and punitive damages, and front pay in the event the complainant could not be reinstated. And both MDA and pentagon ignored our appeals and refused to correct the problem when brought to their attention. Also closed ranks and spinned it (tried to create the most favorable impression possible) to appease outsiders. And initiated cover-ups. Furthermore, the EEOC determined that the victim was "harmed as a result of the Agency's discriminatory action," and that the Agency's discriminatory termination (clearance revocation, suspension, and termination in my case) was the proximate cause of her emotional and physical problems, the Complainant's depression, anxiety, stress, insomnia, difficulty concentrating, disassociation, crying spells, social isolation, damage to her professional reputation, withdrawal from relationships, short-term memory loss, nightmares, panic, worsening abdominal pain, worsening hypertension, dramatic weight-loss, and various ailments brought on by stress (in my case kidney stones, obesity, migraines, etc.)."

3. **Rattigan v. Department of Justice, Case No. 10-5014 won by won by Passman & Kaplan, P.C. law firm.**

   On June 3, 2011, the U.S. Court of Appeals for the District of Columbia Circuit issued its decision which held that disclosing negative information regarding a federal agency employee to the agency's security office in hopes of calling that employee's security clearance into question was not immunized from court review. Rattigan worked for the FBI.

4. **Robinson v. Department of Interior (2011), Case #550-2009-00090X.**

   Ms. Katherine A. Thompson of the Bureau of Reclamation Mid Pacific Region of the Department of the Interior engaged in a pattern of discrimination against Ms. Robinson from May 2006 until she resigned in November 2007 on multiple bases when she regarded Ms. Robinson as a person with a disability once the complainant had serious heart surgery in February 2006, and when she removed her from the IT Supervisor position as soon as she returned to work to allow a younger Caucasian man to occupy the GS-13 supervisor position for long enough to qualify for the new GS-14 IT Manager position. She refused to return Ms. Robinson to her supervisory position at the end of her bogus "detail" assignment and, instead, advertised for the Manager position, and when she did not even consider her for an interview for the advertised position.

5. **Rodgers v. White (No. 10-3916).**

In Rodgers v. White (No. 10-3916), decided on September 2nd, the Seventh Circuit reached the unusual result of allowing a plaintiff to use his supervisor as a comparator in a comparative discipline case alleging race discrimination. The result is important because the Seventh Circuit had previously indicated in several cases that supervisors are typically poor comparators, but this case illustrated a justified exception. Mr. Rodgers, the plaintiff, was the only Black employee among a lawn-maintenance crew of 27 that worked for the Illinois Secretary of State. He was fired purportedly because he had been involved in a practice of allowing crew members to borrow State maintenance equipment and because he had been involved in improper timekeeping practices, and also supposedly had not been forthcoming or helpful in the investigations of such improper practices. However, Rodgers' supervisor, who was White, was involved in the same practices but was merely demoted, not fired. The kicker was that the person who fired Rodgers was the same person that merely demoted his supervisor. The State tried to claim that Rodgers' evasiveness in the investigations made him more culpable, but the Court noted that the supervisor had lied as well and even had more responsibility than Rodgers for the improper timekeeping practices. These facts alone were enough to preclude summary judgment for the State, even where there was no evidence of disparaging comments about Rodgers' race or other direct evidence of discrimination. The takeaway lesson from this case is that, any time an employer is going to fire or discipline an individual in a protected category, the decision maker should look carefully at whether any other employees -- not just those with the same job title -- have engaged in similar conduct and how they have been treated in the past, particularly by that decision maker. If the employer is going to discipline an employee in a protected category more harshly for conduct that is arguably similar to conduct engaged in by other employees, even supervisors, the company better have a very good and documented reason for the difference. Otherwise they too may be facing an unpredictable jury to try to explain the varying treatment.

6. **Royal v. Department of Veterans Affairs, EEOC Appeal No. 0720070045 (Sep. 10, 2007).**

In September 2007, EEOC upheld an Administrative Judge's (AJ) default judgment in favor of complainant, a Staff Nurse Supervisor, who had alleged race discrimination when she was not selected for a Nurse Manager position. The AJ sanctioned the agency for failing to timely investigate the complaint. Relief included retroactive promotion, back pay and a tailored order to allow complainant to submit her request for fees incurred solely for the successful prosecution of the appeal.

7. **Teresa Chambers v. U.S. Park Police (2011).**

   Chambers was fired in 2004 for speaking out publicly about budget issues, but Chambers says she was only telling the truth when she was asked about staffing issues within the department.

8. **US Supreme Court Steelworkers v. Weber, 443 U.S. 193 (1979) No. 78-432 Argued March 28, 1979 and Decided June 27, 1979.**

   Case about "manifest racial imbalance" where they ruled that management had the constitutional right and obligation to help minorities gain and maintain jobs and promotions in the event of a manifest racia l imbalance and surely no black SESs out of 33 is a clear example of "manifest racial imbalance."

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STATEMENT OF THE CASE

MDA broke the law. And they violated federal policies and procedures. And they violated my civil rights. The truth has been covered up by MDA and ignored by DIA and DoD. And the truth is that And the truth is that a white racist SES Senior Leader at MDA colluded with his former buddies at the DIA, the organization he worked for immediately prior to MDA, to get rid of his most senior black employee. And the truth is that the same white racist SES Senior Leader at MDA is using a minor isolated (one-time) security incident to get rid of his most senior black employee. Another truth is that the punishment doesn't fit the "crime" in that termination of employment is too extreme a punishment for civil service employee charging a cell phone in his office in a SCIF in order to accomplish the mission, or for a first offense when no damage was done. And pertaining to this instance, DIA violated the anti-employer discrimination laws, rules and regulations by DIA's Admin Judge's Failure to Postpone Clearance Hearing Long Enough For Me To Get A Lawyer, And DIA's Admin Judge's Failure To Consider My Legitimate Discrimination and Retaliation Concerns in the Clearance Revocation Hearing.

And CAFC is aiding and abetting them. CAFC is aiding and abetting them by wrongfully dismissing the administrative appeal/complaint. And only SCOTUS can rectify their egregious error and reestablish justice in this very unfortunate situation!

This appeal is about DIA's Admin Judge's Failure to Postpone Clearance Hearing Long Enough For Me To Get A Lawyer, And DIA's Admin Judge's Failure To Consider My Legitimate Discrimination and Retaliation Concerns in the Clearance Revocation Hearing! And to a lesser extent, former DIA SES Mr. Michael Waschull's and MDA's **Collusion** with his Former Employer DIA and his old buddies at DIA, in a discrimination-based clearance investigation and revocation process that resulted in wrongfully revoking all my clearances and in my wrongful termination based on racial and age discrimination! **DIA supported their every move, including a discrimination-based clearance investigation and revocation process that resulted in wrongfully revoking all my clearances and in my wrongful termination based on racial and age discrimination,** in order to prevent my transferring to another DoD Organization (so MDA could not only terminate me for not being able to do my job (**a pretense for discrimination**) but prevent me from transferring to another DoD Organization)! **Effectively helping to wrongfully terminate a career civil service employee based on race and age discrimination.**

MDA has used a presidential waiver to create a climate of rule bending (especially discriminating against black employees and other minorities), It is especially egregious behavior because the SES and MDA has used a presidential waiver to create a climate of rule bending, including a culture of discrimination, retaliation, and managerial

abuse of power, a climate of rule-bending for security rules that hindered the mission, such as trying to build an unauthorized telecom link under the table to a foreign country despite pentagon disapproval, signing of ATOs without ST&Es, ignoring DIAP's directive not to skip ST&Es (not performing DIAP-directed site audits), signing unlimited number of IATOs to avoid non-waiverable ST&Es, signing of ATOs by unauthorized personnel (PSOs), bypassing DAA accreditation authority via acreditation of collateral systems by non-DAA-authorized personnel (PSOs, Deputy Director for IT Security, and SAPCO Director who should only accredit non-collateral SAP systems as the PAA), ignoring C&A rules (looking the other way) by bringing the collateral system accreditation in-house to avoid DAA accreditation, appointing unqualified SAPMAN ISSM for political reasons, not having enough software licenses for their desktops and laptops, returning the Nano unwiped and unclassified instead of to the level of the system it was attached to, etc. So when I followed suit and charged my dead cell-phone in my office which was inside a SAPF/SCIF, they vindictively used it as a reason to not only eject me from the SAPF/SCIF, but to revoke all my clearances (so I couldn't be transferred to another position in MDA or DoD) and to deny me a merit-selected transfer to the Pentagon, and to deny my early retirement request which will cost me my health care and all other benefits (all because I charged a 1st generation cell phone with no camera, no data-transfer capabilities and it was a first offense where SOP is retraining and where no damage or disclosure occurred to the data or info systems).

The Presidential Waiver given to the Missile Defense Agency to bypass any law or rule that interfered with their standing up a missile defense system despite the fact that it violated employee and civil rights. Also once the missile defense system was stood up, MDA made no effort to go back and fix what was broken or bypass or even comply with the laws and rules they ignored while standing up the systems. Sadly, MDA, never went back and fixed the problems (civil rights violations, EEO violations, Employee Rights violations, security violations, personnel violations, management mistakes, diversity inequities, race and age discrimination, etc.) they created by circumventing rules and regulations and using any means necessary after they stood up the missile system like they promised they would. In fact, MDA has become a repository for vindictive unfit managers who couldn't survive anywhere else (and full of employees who can't go anywhere else – most of the good ones that could get other jobs have already left or are in the process of leaving or sticking it out until BRAC forces them to retire). And it's all because MDA misused their Presidential Waiver and because they didn't have to follow the rules to accomplish the mission (which is ironic and hypocritical that they are picking on me for bending a couple of rules to accomplish the mission). Collateral damage from the Presidential Waiver was unnecessary and too severe (too many unanticipated problems, too many people get hurt).

My case covers so many areas, Employer Discrimination, Wrongful Collusion, National Security, Presidential Powers and Presidential Waivers, Unconstitutional Laws and Powers, Unconstitutional Behavior, Constitutional Law, Ethics and Retributive Justice, Due Process clause of the 14th Amendment, Civil Rights, Race Discrimination, Age Discrimination, and Abuse of Power (Authority), Segregation, Jobs and Employee Rights and "Right to Work" Laws, Government Reform, Pro Se Legal Representation Reform, Compensatory and Punitive Damage Caps, Treatment of Veterans, Cover-Ups, etc., **that the court could use MDA as an example to make a statement (and set one or more precedents) on any or all of the areas.** As a matter of fact, my chances of being selected should probably increase with the number of birds the Supreme Court can kill with one stone.

And most importantly, this case is about Employer Discrimination, and to a lesser extent, Wrongful Collusion, and it's about getting rid of a black employee (me) by any means necessary which is why they tried to stack 1 rated appraisals so they could attack me on performance grounds, in case the clearance revocation attempt didn't work (in case DIA reinstated me), and why they tried to get me to quit by placing me on unpaid suspension hoping I would run out of money and be forced to quit or be forced to retire to save my benefits (health insurance, life insurance, etc.).

Here is a Summary of my case (what Mr. Waschull and MDA has done to me over the past two years and don't want anyone to know).

Executive Summary for the Supreme Court

It all started when Mr. Waschall wanted to do his friends in a foreign country a favor at the expense of the US Government. Specifically he wanted to install a telecom link to speed the transfer of classified information since the diplomatic pouch was so slow. First thing I did was go to DISA because they are the experts at this type of thing but when he found out he ordered me to bypass DISA and do it unofficially under the table instead. I found out why when researching the project further. Two of his senior managers a man and an woman both told me that he had tried it twice before and that it was rejected by the Pentagon and that I should ask to get off of the project because if something went wrong I would be the one to go to jail. I did ask to get off the project and he denied my request so I dragged my feat until it was OBE. He disliked me ever since and has been looking for a way to get back at me. For my part, I stayed well out of his way (not even communicating with him for a year). Well the moment came when I charged my dead cell-phone in my office in his SAPF.

One day, no different than any other day, I woke up at 0430, got ready for work and quietly caught the metro at 0520 to work while family slept. When I got to work at 0630 I

noticed my cell phone was dead so since I had important time sensitive mission critical work to do and since there was no one in the outer lobby to watch it I decided to charge it in my office while doing my work. I did so because I had been stranded at East Falls Church the week before for 3 hours with no way of getting a hold of my family to tell them what was going on and I didn't want it to happen again and because I figured I could use my expertise to mitigate the risk to an acceptable level (to a point where no damage would occur). In order to mitigate the risks before charging, I made sure the classified terminals were off, all classified materials were secured and the safe locked (not working on any classified material while charging), the office door closed, the cell phone was 4 feet away form the classified terminals, not making any phone calls during the charging, and not receiving any guests during the charging. Additionally, the cell phone itself mitigated risk in that it was a 1st generation cell phone given to new Verizon customers for free and as such didn't have a camera, no memory to speak of (could only save a few phone numbers), no recording features, no WiFi, no Wireless Interface, No Blue Tooth, No data transfer capabilities, no USB Connector (couldn't upload or download or manipulate data), No Internet Capability, No Instant Messaging capability, No music capability, no email capability, and no speakerphone (which is why neither the scanning team or the counterintelligence people confiscated it).

While working on my mission essential work, a crew of signal analysts came through the SAPF picked up my cell phone signal and came into my office. When I saw them I gathered my cell phone and charging cord and took it outside to the lock box and locked it up. One of them followed me out, checked the phone and gave it back to me (did not confiscate it). Doug Clover my supervisor was out of the office in training so Mr. Waschull got the report and had me locked out of the SAPF. When asked why he said he thought I was a spy, which is ludicrous because I didn't meet any of the red flags (heavy financial indebtedness, sudden affluence, alcoholism, and disgruntlement). He also took away 80% of my workload and limited me only writing security policies even though the vast majority of the work he took away was unclassified (IT Support, C&A, Reviewing System Security Plans, etc.).

While I was working on the policies that management never approved, the only work I was allowed to do, Mr. Washcull and MDA went through my office looking for other violations they could get me on so they could build a case to get rid of me. They didn't reprimand me. They didn't retrain me, which was standard operating procedure (SOP) for a first-time security incident where no damage was done, which is typical behavior for people perpetrating discrimination. Apparently they brought in the FBI to build a stronger case and when they said ***"We see nothing actionable, just an IT specialist cutting corners to get the job done"*** Mr. Washcull decided to use his own internal (biased) personnel who worked for him to do a second investigation of their own. They said they found a lot of other so-called "incriminating" evidence that they said made me a threat to

national security. Additionally he told DIA that he thought I was a spy and asked them to revoke all of my clearances and not just the one involving SAPF/SCI facilities (because he didn't want me transferred to another job in MDA or DoD for that matter). The problem with their "incriminating" evidence was that it was a bunch of exaggerations and half-truths with the goal of revoking all my clearances and chasing me out of MDA, DoD, and Civil Service.

They said I had over 100 computer disks (CD-ROMS) were discovered, that had not been scanned or screened by Document Control in an effort to undermine my credibility and establish me as a rule breaker and someone who didn't care about security and implying that that attitude translated to classified information as well. What they didn't say was that the 100s of computer disks they found were Read-Only Memory meaning you couldn't rewrite to them and all but 1 were gold disks made by DISA and FEDEXed to me over the past 5 years and used to do my job (Gold Disks are CDs that contain Security Technical Implementation Guide or STIG based configurations of operating systems that identify vulnerabilities in your configuration and tell you how to correct them), and Computer-based Training CD-ROMs. Furthermore, all the disks were unclassified and the disks were prepared by a government agency and virus scanned by that agency before being sent to me. And by the way, DISA Read-Only Gold Disks are government issued work products and are authorized by local policy (our local policy allows government created CD-ROMS to be kept without document control tags). They didn't even itemize the disks because everyone would know that they are a non-issue (not the threat they make them out to be). ***Which is why the Supreme Court needs to question MDA's "facts" as well all their motives in this case.***

They also said I used my 4 GB Apple Nano to accomplish unclassified file transfers between classified and unclassified computer hard drives, aka Sneakernetting. What they didn't say was that sneakernetting is one of the most common practices in DoD to get the job done and accomplish the mission. SOP is to overlook it if no damage is done. Nor that no classified information was damaged destroyed or disclosed. Nor that I was instructed to copy all the C&A files from the unclassified computer to the classified computer and that since the At the time the help desk didn't have CD-ROMs to give me. So I took my Nano that contained music for jogging and backup documents from the H: drive and copied the C&A documents (unclassified PowerPoint SSP Review slides and IATO letters – there were over 30) to the Nano and then transferred the information into the IA folder on the classified network. Nor did they tell you the file transfers were always from low to high and only to accomplish the mission. Nor that the risk of disclosure or destruction was minimal because the Nano was virus checked by MDA virus checker and the transfer was one way only and lasted lest than a minute (I never left the Nano plugged in for more than 1 minute at a time). Furthermore the security protocols on the classified system are substantial (completely compartmented, etc.). Since I helped

design it and approved the System Security Plan, I knew what I was doing was safe. Nor did they say that when asked for the Nano, I willingly turned it over to the counterintelligence people for forensics (full and immediate cooperation because I had nothing to hide). Nor did they say that the counterintelligence people "found no data that violated DoD regulations" and returned the Nano unwiped and in original condition (didn't even see the need to classify it to the level of the classified system) because it too was not seen as the threat MDA made it out to be. Nor did they say that I am an expert at identifying and mitigating risks, and that my job involves doing it every day. ***Nor did they say there was no damage destruction or disclosure because of my extensive mitigations and expertise.***

When they realized they had no case (realize the allegation were either exaggerated or weren't true) and because of the fact that there was no damage, they stopped making the above accusations began to focus on my judgment and character to push the revocation through. And they started doing things out of the ordinary (think vendetta, conflicts of interest and cover-up).
Mr. Waschull used his own counterintelligence people to do a 2nd investigation when the FBI found nothing actionable. Mr. Waschull asked DIA to investigate my clearance because he use to work for DIA (came to MDA from DIA) and still has friends there, which increased his chances of getting a favorable outcome. And in the next few weeks the same person who started the persecution (vendetta), Mr. Waschull, would order my paycheck stopped, would try and stack 1 appraisals, would simultaneously sign my appraisal and also serve as the Pay Pool Manager (the first level official of the NSPS Reconsideration appeal), and would terminate me because I wouldn't drop my appeals against him. And these were in addition to the things they had already done such as: isolating me from my colleagues by moving me to another building and surrounding me with strangers; withholding my 30-year pin and certificate for 12 months; calling me a baby killer and other inappropriate and offensive remarks; changing a long-standing rule to send policies to Policy Working Group (PWG) for comment to IT Team (apparently so they could say they put on the appraisal that they had to rewrite my stuff); changing a long-standing rule (behind my back) that I was to review all System Security Plans (SSPs) and send my analysis to Doug (apparently before they realized I had already done twice as many as last year so they could make a negative remark about it on my appraisal); changing a long-standing policy by picking an ISA/ISSM for SAP systems from the read-on government staff (when they went looking for one for the new SAPWAN system they decided not to pick a person internal to DOSP and already read on to administer IAM/ISSM duties for the SAP system and when I asked Doug about it, he said Mr. Waschull didn't want to pick me, even though I was the only government worker qualified to do it, and that he was told to pick someone else even though they would not be read on – it would be up to the read-on staff to tell them what they need to know to do their job); changing a long-standing policy regarding the classification of the IATO letters

(the long-standing policy was to draft an unclassified IATO/ATO that could be done by DOCV or reviewed by anyone, while at the same time, another SAP document was created by PSOs and PMs detailing what could be put on the accredited system); changing a long-standing rule by adding the SAP info to the unclassified IATOs/ATOs in order to keep them out of the public domain (restrict them to read-on people) and protect themselves from prying eyes, especially the folks at DOCV, and to ensure this they ordered me to not interact with DOCV for any reason, not even tell them we were processing everything, even collateral, in-house (which was bending/changing regulations too, since they are the DAA Reps), which also caused duplication of effort problems because they were not even told to stop processing the systems we had already accredited in-house (and when I told them they didn't care); and changing a long-standing policy when they stopped allowing me to switch my CWS day in order to better accomplish the mission (get an extra 9 hours of work production that would be lost if a sick day were taken) after 3 years of letting me do so (which they only did after I appealed my appraisal rating and asked for an admin transfer - coincident or retaliation? So contrary to what the MDA claims, when you look at this incident objectively, you see that this is not about ***classified information or national security. It's about an IA/C&A SME who is paid to make security decisions, making a security decision based on his expertise to waive a couple of rules to get the job done*** (and no different than when MDA returned the nano without classifying it to the level of the system it was attached to or wiping it, and no different than my superiors waiving similar rules that require site audits (ST&Es) when issuing ATOs or accrediting collateral (nonSAP) systems without the DAA's knowledge or consent (in violation of both MDA CIO and DoD DIAP rules) – ***in essence creating a climate where bending rules to accomplish the mission is acceptable***).

I apologized, said I wouldn't do it again and continued working on the work I was assigned and thought that was the end of it. But my managers were determined to blow this minor security incident way out of proportion in order to use it to get rid of me. So they had the interviewers call me in and asked me questions and I cooperated fully (something a spy wouldn't do). And when appraisals came around and I had provided my usual input they completely ignored my input, and the fact that I completed twice the amount of work as the year before, and gave me a 1, the lowest rating, based on the single security incident. Again, they did a lot of things out of the ordinary. They ignored all of my other work; they ignored my written input describing my contributions to the agency; they ignored the fact, the fact that I had completed an all-time high 8 Policies (double the number last year); and they ignored the fact that I completed an all-time high 84 SSP Reviews (double the number last year). Which in effect demonstrated the dilemma for blacks at MDA (how they were forced to do double the work of white employees for half the ratings and rewards, which is borne out by comparing white and black ratings and bonuses at MDA - shades of 1904 and the Pullman Company).

I immediately appealed the 1 rating through formal channels and began going up my COC to formally protest the way I was being treated (didn't before because I didn't want to make waves and because my wife wanted to PCS to Hunstville to be closer with her family in Montgomery and I didn't want to jeopardize the move). At the same time I was offered a GS-2210-15 job at the Pentagon for the OSD Comptroller. I accepted the job and MDA formally outprocessed me and I reported to my new job. After a couple of hours working, I was told that MDA had contacted Washington Headquarters Service (WHS HR) and insisted that I be return to MDA, no reason was given (but it was to persecute for appealing making my management look bad. ***They could have left me at the Pentagon where I was working but they didn't because they wanted to try and get rid of me.*** After a big hassle getting me my badges back and my desktop and cell phone back (none of which worked initially) they tried to put me in a new office away from the people I had worked with for the last to years (apparently to isolate me from everyone so I wouldn't let them know how badly I was being treated) that was already occupied by an Army Colonel. So I filed a complaint about that, which was eventually resolved, but not without a lot of stress, and I was effectively isolated from everyone I had worked with surrounded by strangers with nothing to do except work on appeal documentation (no longer doing policies).

One day the Vice Director asked to see me but when I showed up, my appointment had been rescheduled and then subsequently cancelled (apparently they got to him too). And I found out that instead of requesting a revocation of my SCI clearance (because the incident happened in a SAPF) which again is SOP, Mr. Waschull and MDA requested a complete revocation of all of my clearances from DIA so I couldn't be transferred to another job in MDA (or DoD for that matter). Mr. Washcull and MDA even told the Unemployment Benefits people that my suspension was my fault so I would get unemployment benefits in an effort to drain me of resources (money) so I would have to quite and let them off the hook.

While going up my chain I was worn out and my tolerances were down so low I caught the flu and had a fever on the day I was to see Mr. Washcull while going up my COC. He treated me very badly. Had me sit there obviously sick while he belittled regurgitating all the accusations that he and MDA had been making for months, instead of acknowledging my desire to properly go up my COC to resolve my grievances. Life at work was a nightmare and I began having nightmares at home so my mind and body couldn't rejuvenate itself. Along the way, they gave me my Nano back intact no less. Finally when Mr. Washcull and MDA were ready, they called me in and took my badges and had me escorted out of the building. I continued my fight at home although without my access to my unclassified profile at work (which they denied my formal request for), and emails and documents on the unclassified LAN, it was nearly impossible to produce

documentation or dates for most of the things Mr. Washcull and MDA had done (they obviously knew what they were doing).

I appealed to every higher authority I could think of (Oliver Wendell Homes said, "the best illumination comes from above"), unfortunately many of them answered to DoD, by filing appeals to my COC (including the Pentagon and Secretary of Defense), the Defense Intelligence Agency and their Security Clearance Adjudication Board (SAB), MSPB (and subsequently to the US Court of Appeals for the Fed
eral Circuit), the Office of Special Counsel, the VA Unemployment Commission, the EEOC, and my Senators and Congressman. They responded by offering me VERA and VSIP (early retirement) if I would drop all of my appeals and not talk to anyone about what had happened to me and I turned them down. What they did was wrong and I figured if I kept telling people in authority someone would see it and do something about it. Besides I was not the only employee treated in such a hostile manner and I wanted to help the others.

But Mr. Waschull and MDA were relentless in their desire (obsession) to get rid of me. They never stopped trying to make things worst in order to get me to quite trying to expose their mistakes and cover-ups. They placed me on unpaid administrative leave hoping that I would quite or my savings that enabled me to fight would run out. And since they forced me to use my TSP Retirement Fund to feed my family and pay my bills, I had to pay early withdrawal penalties and interest and taxes. And their decision to stop my pay (when they didn't have too – could have left me on administrative leave until the appeals had been completed – could have treated me like I was innocent until proven guilty) ruined my credit too (it went from about 600 to 350). They tried to stack bad appraisals so in case I won my DIA appeal, they could try and get rid of me on performance. They began threatening to fire me and drag things out until my government benefits disappeared (which they did and after 365 days I lost my health insurance and all of my other government benefits and couldn't get Temporary Continuing Coverage or TCC because of their well-panned premeditated strategy to make me suffer by terminating me after 365 days of unpaid suspension (or the first time their premeditated persecution hit its mark – revoking my TS-SCI clearance cost me a $150,000 job offer with a Intel Community contractor).

My friends convinced me it was race discrimination (I thought it was a clear case of abuse of management authority/abuse of power and misuse of a presidential waiver to bypass the law and the rules and regulations) when they started reminding me of all the things Mr. Washcull and MDA had put me through. The precious harassment, the withholding my 30-year pin and certificate for 12 months, no government cell phone, no corner office, no STE even though my job required it, etc. There are so many unexplainable decisions, so many inconsistencies, so many conflicts of interest, that it

had to be racism they said. And when they said, "how come there are no black people in senior leadership positions. There are 33 SESes. Shouldn't 2 or 3 be black? And don't you think if there were a black senior executive that this persecution would have been allowed to continue unabated for so long" finally convinced me.

Unfortunately, MDA constantly ignored what they didn't want to hear (they should be hoisted on the pillar of arrogance) until EEOC, the first authority not inside the DoD circle of influence, ruled against them and told them there were grounds for racial discrimination (they said there wasn't and summarily dismissed my complaint out of hand without bothering to investigate it) and ordered them to do a full and complete investigation of my grievances.

Essentially, the truth has been covered up by MDA and ignored by DIA and DoD. And the truth is that a bigoted SES Senior Leader at MDA used a minor isolated (one-time) security incident to get rid of his most senior black employee. Another truth is that the punishment doesn't fit the "crime" in that a 1 rating, a year of unpaid suspension, and termination of employment is too extreme a punishment for civil service employee charging a cell phone in his office in a SAPF, for a first offense when no damage was done in order to accomplish the mission. And it is especially egregious behavior because MDA vindictively used it as a reason to not only eject me from the SAPF/SCIF, but to revoke all my clearances so I couldn't be transferred to another position in MDA or DoD, and to deny me a merit-selected transfer to the Pentagon, and to deny my early retirement request which has cost me my health care and all other benefits (all because I charged a 1st generation cell phone with no camera, no data-transfer capabilities and it was a first offense where SOP is retraining and where no damage or disclosure occurred to the data or info systems).

Bottom Line: Mr. Washcull had a choice. The SOP gave him options. He didn't have to ask for Total Clearance Revocation (so I couldn't work anywhere anymore), or chose Maximum Punishment or Unlawful Termination, but he did! And when he realized I wasn't a spy or that no damage was done, he still insisted on Maximum Punishment. **Also, each person in the COC had a choice.** They could have done something about it, but didn't! They chose to look the other way. And so did MSPB and CAFC! With the stroke of a pen you can undo this unlawful discrimination and retaliation. And you can correct CAFC's erroneous decision!

The MSPB Proceedings and Denial of My Request for an Oral Hearing

MSPB proceedings were more of the same. People bent on maintaining the status quo at the expense of justice and fairness and getting to the truth. At every turn they sided with

MDA in order to protect their reputation, their resources and the status quo. At every turn they utilized lack of jurisdiction and other legal techniques to conceal evidence and avert justice! Furthermore they denied a legitimate request for an oral hearing, in effect, denying me my right to a fair hearing, my right to be heard, and my right to face my accuser, thus violating the sixth amendment of the US Constitution.

The CAFC Proceedings and Denial of My Request for an Oral Hearing

Ditto for the CAFC proceedings. More recently they have resorted to sidestepping my Appeals by transferring them to the US District Court for the Eastern District of Virginia (USDC-EDVA) to save resources and avoid the responsibility of making a decision. In effect, CAFC is violating the Sixth Amendment which calls for speedy hearings and case resolutions by needlessly delaying my hearings and decisions. Furthermore, transferring my case to the US District Court for the Eastern District of VA (USDC-EDVA) adds 2 more layers of judicial bureaucracy to my appeal/case (and additional suffering for my family and I) if I have to appeal their decisions (USDC-EDVA and CA4C), no doubt an effort to delay my case until I die or quit. It is bureaucratic and judicial apathy like this that has caused my appeals to drag on for five years and made the affects of my discrimination and retaliation much worst (and is going to encourage the bad guys to continue their egregious behavior in the future).

As a result of Mr. Washull's and MDA's Discrimination, I was **wrongfully stripped of all my beloved clearances I spent 33 years earning** (I receive my TS-SCI when I went into the USAF because I was programming satellites in FORTRAN and maintained it throughout my entire career until a bigoted SES Colluded with DIA and had all of my clearances discriminatorily revoked so he could prevent me from being transferred anywhere else in DoD), **wrongfully stripped of my beloved cybersecuirty job** (one I was very good at and a critical shortage job in DoD), **wrongfully stripped of my beloved civil service career** (when I had a great chance of breaking the longevity record), **wrongfully stripped of my beloved FEHB health care and FEGLI life insurance** (when I desperately needed because I had 3 uninsurable family members, wife with Cancer, son with Autism, and me with Diabetes)!

Do you want quantifiable costs for MDA's Discrimination?

How about 7 years my family and I had no health care whatsoever! And what about the stress, anguish, trauma, anxiety, humiliation, indignity and physical, emotional, mental and psychological damage that caused us? The Medical Bills due to the lack of health insurance now total **$149,085.20**! But what about the unquantifiable costs?!

What about the TSP I lost because of MDA's Discrimination, which was **$562,113.49** then, and would be at least **$2,400,000.00** today? And what about the IRA I lost which was $**40,024.58** then, and would be at least **$160,000.00** today?

What about the $909.00 a month break-in-service penalty and indignity I have been forced to endure for 141 months (from Nov 30, 2011 to present) because of MDA's Discrimination? That cost is 141 * $909.00 = **$128,169.00**!

What about my back pay costs? That cost would be at least **$1,480,000.00**! And what about my Future Earnings costs? That cost would be at least **$3,100,000.00**!

How about the **$1,100,000.00** in medical bills that has yet to be paid for my Autistic son's 100 day hospital stay at Reston Hospital and Moss Rehab Hospital?

And what about all the money my sons have loaned me to keep me financially afloat? So far they have loaned me **$80,677.58** and counting!

What about the **$68,000.00** tax bill the IRS levied when MDA's Discrimination forced me into liquidating my TSP and IRA?

And what about the **$676,560.00** in PLUS loans my wife and I had to get to send our son to college because of MDA's Discriminatory wrongful job termination which cost us our sole income and means to send them to college?!

What about my credit rating that was trashed by MDA's Discrimination? It went from 680 to 505!

And that's not counting all the physical and emotional and mental and psychological pain and suffering, MDA's Discrimination has caused me and each member of my family! Even our beloved golden retriever suffered needlessly because we couldn't afford to take him to the veterinarian and needlessly died early because of MDA's Discrimination!

MDA's Discrimination and all the people and organizations whom we went to for help that stood around and let it happen (accomplices during and after the fact) has cost me and every member of my family unimaginable and irreparable injuries and damages that will never be healed or fixed by monetary means alone. Mr. Washcull and MDA and all the others should and must be held accountable for their egregious atrocities and only you, the US Supreme Court can do that now. Every other authority has disingenuously dismissed our pleas for help out of hand!

REASONS FOR GRANTING THE PETITION

My case is unique and important. It deals with Employer Discrimination in the Department of Defense, specifically the Missile Defense Agency's Discrimination against Charles Adams, CISSP. And it deals with the **employer discrimination and the wrongful Collusion** between Mr. Adams' Second-level Supervisor, Mr. Waschull, and his immediately prior organization, the Defense Intelligence Agency or DIA. It is also about the egregious error CAFC made in their decision to dismiss CAFC 2023-1678 (DC-3443-18-0288-I-1) which is an MSPB Administrative Appeal Against DIA For their Admin Judge's Failure to Postpone Clearance Hearing Long Enough For Me To Get A Lawyer, And their Admin Judge's Failure To Consider My Legitimate Discrimination and Retaliation Concerns in the Clearance Revocation Hearing!

Finally it deals with the constitution and whether a President can waive laws that deny citizens (employees) rights and violate EEO rules and regulations even to get a strategic national defense advantage such as standing up the missile defense system.

My case has the potential to resolve a long-standing conflict between Presidential Powers for National Defense and Individual rights of Government Employees and American Citizens when one has to be chosen over the other. And to validate the wrongfulness and injustice of **collusion** between powerful entities when directed at powerless employees.

By allowing MDA to ignore personnel rules and regulation (and security and other long-standing rules and regulations) because of a Presidential waiver, DIA and MDA have been able to haphazardly use security clearance revocations as a tool to get rid of vested employees they don't like or disagree with, or worst solely because of the color of their skin (which is blatant racism and employer discrimination). And likewise, by allowing DIA to practice wrongful **collusion** without consequences, DIA and Mr. Waschull have been able to been able to haphazardly use security clearance revocations as a tool to get rid of vested employees they don't like or disagree with, or worst solely because of the color of their skin (which is blatant racism and employer discrimination).. Thus I feel the Supreme Court should grant my petition (take on my case) in order to determine once and for all whether the president has the right to waive rules and regulations and policies (and even laws) in order to facilitate national security **at the expense of the civil rights of federal employees and American Citizens,** and whether **Collusion** in the Department of Defense and the Federal Government should go unheeded and unchecked, **with no one and no organization being held accountable for it**.

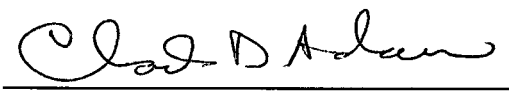
I'm also appealing my US Court of Appeals decision to the Supreme Court. Given the unique circumstances, perhaps it's not too late for you (the US Supreme Court) to help me. I'm thinking along the lines of the legality of using Presidential Waivers to circumvent EEO laws rules and regulations that violate employee rights and the potential to resolve a long-standing conflict between Presidential Powers for National Defense and Individual rights of Government Employees and American citizens when one has to be chosen over the other. And I'm also thinking along the lines of the immorality of **Collusion** when it helps the powerful at the expense of the powerless, and helps the employer at the expense of its employees.

Additionally, it is my belief that if you take the case, not only will it give you the opportunity to change the way the government operates for the better, but once the Department of Defense finds out that you have taken the case, they might direct MDA to settle (because they don't want you messing around with the way they do things), **and justice will be served**.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,



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