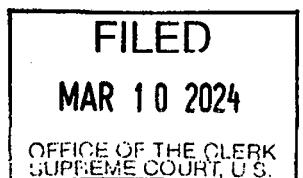


Case No. 23 - 7080



In the United States Supreme Court

Curtis D. Vaughn

*Petitioner*

v.

Missouri State University Administrator Sean M. Flannery, et al.

*Respondents*

On Petition for a Writ of Certiorari to  
the United States Court of Appeals  
for the Eighth Circuit

PETITION FOR A WRIT OF CERTIORARI

Pro-Se Plaintiff

Curtis Dwayne Vaughn

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1825 East Republic Rd. Apt 6404

Springfield, Missouri 65804

## **QUESTIONS**

**(VAUGHN IS NOT FREE TO SPEAK WITH HIS CASH, COIN, TO PAY FOR  
PRINT, USE OF PRINTERS, NOR PRINT THE QUESTIONS, OR REDRESS,  
AT THE PUBLIC PRINTING FORUMS, OF MISSOURI STATE  
UNIVERSITY)**

1. To meet the fourteenth and fifth amendment requirements of laws such as § 255 Services to the Hearing Impaired and Others with Communication Disabilities, be given to Vaughn, does the court agree, to resolve the circuit split on Rule 15(d) supplemental pleading to cure standing defects?
2. In order to meet the fifth and fourteenth amendment rights of disabled Americans, the Americans With Disabilities Act 1990, 2008 amend and federal rehabilitation act 1973 section 504, are the United States Courts and federal judiciary required to provide broad, reasonable accommodations, to Vaughn, and all disabled Americans?

## **PARTIES TO THE PROCEEDINGS**

Missouri State University Administrator Sean M. Flannery (official capacity)

The Board of Governors of Missouri State University

Missouri State University Information Services (Missouri State University)

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## **PROCEEDINGS IN FEDERAL AND APPELLATE COURTS**

### **ON APPEAL, VAUGHN V. FLANNERY ET AL 23-2962**

EIGHTH CIRCUIT COURT, DOCKET 101 (DISTRICT), ORDER DENYING PETITION FOR REHEARING BY PANEL, AND ALL PENDING MOTIONS. JUDGMENT ENTRY 10/13/2023.

### **PREVIOUS CASES, DIRECTLY RELATED:**

Vaughn v. Flannery et al, 23-1772

Vaughn v. Flannery et al, 23-1281

Vaughn v. Flannery 23-1675

Vaughn v. Flannery 22-3301 (ORIGINAL CASE)

The eighth circuit, the district court, have refused to Vaughn access, full court records, without excessive cost, financial hardship; he does not have access to case information, documents, necessary, for concisely, accurately detailing all proceedings, redressing, in the writ of certiorari.

## TABLE OF CONTENTS

In Forma Pauperis

Cover Page

Questions

Parties to the Proceedings

Table of Authorities Cited

Citations of Official and Unofficial Reports

Jurisdiction

Provisions, Laws

Statement of the Case

Argument

Closing

*Consealon Record*

*Proof of Service*

## TABLE OF CITED AUTHORITIES

Tennessee v. Lane 549 US 509

Perez v. Sturgis Public Schools, et al. 598 US 2023

Timbs v. Indiana 586 \_ US

Dobbs v. Jackson Womens Health 597 \_ US

Brown v. Board of Education of Topeka, 347 U.S. 483

Hazelwood v. Kuhlmeier, 484 U.S. 260

Nelson v. Moline School District

**CITATIONS OF THE OFFICIAL, UNOFFICIAL REPORTS OF OPINIONS  
AND ORDERS ENTERED**

THE EIGHTH CIRCUIT, DISTRICT COURT, WITHOUT DUE PROCESS OF THE LAWS GIVEN, DEPRIVED FINANCIALLY INDIGENT VAUGHN OF PROTECTIONS FROM EXCESSIVE FEES, FINES, COSTS—AND DUE PROCESS OF REDRESS. VAUGHN IS UNABLE TO ACCESS, AND IS FINANCIALLY PROHIBITED FROM ACCESSING OFFICIAL, UNOFFICIAL REPORTS OF OPINIONS AND ORDERS ENTERED; THE OFFICIAL, UNOFFICIAL REPORTS OF OPINIONS AND ORDERS ENTERED, ARE UNAVAILABLE TO VAUGHN, IN REDRESS, IN VIOLATION OF,

**JURISDICTION**

ARTICLE III, SECTION TWO, GRANTS THE UNITED STATES SUPREME COURT, JURISDICTION, OVER CONFLICT, CONTROVERSY, OF VAUGHN'S COMPLAINT, 1) ABRIDGED PRESS, 2) ABRIDGED SPEECH (ABRIDGED FROM BEFORE, DURING, AND NOW, AFTER THE CASE), (ADMITTED TO, UNDER

AFFIDAVIT BY DEFENDENTS) AT THE PUBLIC PRINTING FORUMS, PUBLIC COMPUTER LABS, PUBLIC LIBRARY, OF PUBLIC, MISSOURI STATE UNIVERSITY.

AMENDMENT V, AMENDMENT XVI, REQUIRE DUE PROCESS OF LAWS, BE GIVEN BEFORE DEPRIVATION OF LIBERTY, PROPERTY, LIFE. VAUGHN HAS BEEN DEPRIVED OF DUE PROCESS OF THE LAWS, DEPRIVED OF LIBERTIES OF PRESS, SPEECH, REDRESS, PEACEABLE ASSEMBLY, PROTECTIONS OF THE LAWS—WITHOUT DUE PROCESS OF THE LAWS, GIVEN; AMENDMENT V AND AMENDMENT XVI, DUE PROCESS OF THE LAWS, SUPPORT JURISDICTION AND THE COURT HEARING VAUGHN WITH DUE PROCESS OF THE LAWS, GIVEN.

ON APPEAL, 23-2962, JUDGMENT ENTRY 10/13/2023. HONORABLE KAVANAUGH ORDERED THE CASE FILED TODAY, MARCH 11, 2024; IT IS FILED, March 11, 2024, BY THIRD PARTY CARRIER.

28 U.S. Code § 1651, GRANTS THE UNITED STATES SUPREME COURT AUTHORITY, BY CONGRESS FOR JURISDICTION, TO HEAR, REVIEW THE CASE.

## **PROVISIONS, LAWS, AND CASES**

### **THE UNITED STATES CONSTITUTION**

ARTICLE III, SECTION II

AMENDMENT I

AMENDMENT V

AMENDMENT VIII

AMENDMENT XIV

### **THE LAWS OF THE UNITED STATES**

AMERICANS WITH DISABILITIES ACT 1990

AMERICANS WITH DISABILITIES ACT AMEND 2008

JUDICIAL CONFERENCE 255

### **STATEMENT OF THE CASE**

Please note, in combination with being deprived of protections from excessive fees of PACER and denied access to full court documents, alongside no protections of laws, of Judicial Conference 255, nor Americans With Disabilities Act, financially indigent and disabled Vaughn is both unable to give a full account of the appeals,

nor able to fully communicate the information of the district docket in clear, full, accurate fashion; there is plenty more Vaughn knows, wishes to convey, but as deprivation of laws has occurred, he is limited, of what is accomplishable in this redress.

**THIS WRIT OF CERTIORARI APPEAL IS FROM VAUGHN V FLANNERY ET AL, 23-2962, IN THE EIGHTH CIRCUIT COURT, AND ORIGINATES FROM VAUGHN V. FLANNERY ET AL, 22-3301 IN THE DISTRICT COURT.**

**BETWEEN VAUGHN V. FLANNERY ET AL, 22-3301, AND VAUGHN V. FLANNERY 23-2962—THREE APPEALS OCCURRED:**

**APPEAL FOR DUE PROCESS OF LAWS TO BE GIVEN: VAUGHN V. FLANNERY ET AL, 23-1281.**

**APPEAL FOR EQUAL PROTECTION OF LAWS, TO BE GIVEN: VAUGHN V. FLANNERY ET AL, 23-1675.**

**APPEAL FOR HALTING THE TWO ORIGINAL CONTROVERSIES, 23-1772.**

In December 2022, Vaughn filed complaint, 22-3301, in the district court, with two separate statements of claims. The first statement of claim, the defendants broadly abridging the freedom of press on content, topic, purpose viewpoints, and the second statement of claim, the defendants, abridging the freedom of speech, on

content, topic, purpose viewpoints, and prior restraint, pre-empting Vaughn from the freedom to speak with his cash, and pay for non-broadly abridged printing, print, at the public printing labs, public printing forums, of the public library, of the public university, Missouri State University. The defendants and opposing admitted to both claims, under affidavit.

In 22-3301, Vaughn filed an injunction on docket 7, to halt the abridgment of press, halt the abridgement of speech, on prior restraint, content, topic, purpose, viewpoint discrimination. In district docket, 10 the district Justice acknowledged the prior restraint of view point discrimination, however chose to deny halt the constitutional harms occurring—and still wide open, ongoing.

On the same day, as the district Justice denied halting the abridgment of press, in docket 11, denied halting the abridgment of speech, the district court, appearing to not understand Vaughn, and thereby also denied the communication accommodations of Judicial Conference 255, for cognitive communication disabled Vaughn, to communicate, give statements, be heard, be understood.

In response to the original complaint, the defendants and opposing counsel, introduced uncorroborated hearsay, claiming it were fact. Without corroborating fact, the defendants and opposing counsel purported Vaughn's statements one,

statements two, were now, unified, as statement three—concocted by opposing counsel, they claimed Vaughns first two statements were now, merely, one, that had no basis in his comment, according the defense, Vaughn was not saying statement one and two, but without fact, they purport a violation of cash free print. But Vaughn never hired the opposing counsel, to give a statement for him, nor did he agree to the statement three proposed by them; he denied, and showed why. The defendants took advantage of Vaughn's brutally honesty, and cited the November 20<sup>th</sup> documentation of Vaughn notifying the computer lab worker, he was out of print allotment, and that wished to buy more, but on that evening, had no money. Not only did the defense and opposing counsel, argue Vaughn, only alleged he was at the computer lab, on November 20<sup>th</sup>, wherein they built statement three, "cash-free", but the defendants and opposing counsel also, did not prove state of mind of Vaughn, required to become fact\*, of Vaughn's wanting, seeking, intending cash free print, nor his ability or inability to pay for printing, and neither did the opposing counsel and defendants deny Vaughn returning on November 21<sup>st</sup>, with the instruction from the computer lab worker, for Vaughn to use his cash, to pay for print, to attempt to purchase print, printing allotment, make payment—as documented, and Vaughn attempting to use his cash, coin, currency, as speech to purchase print allotment, to print unabridged at the public printing forums of Missouri State University, from the Missouri State University Bookstore, Missouri State University computer lab, and on the phone with Missouri State University Administrator Sean M. Flannery. The defendants did not deny Sean Flannery

denied Vaughn print, did not deny Flannery denying Vaughn' use of his own cash to pay for printing, nor did they deny Vaughn acted in prior restraint, to verify the purpose of the printing, to guarantee if it were for a course related print, viewpoint. The defendants, did not deny Sean Flannery, gave Vaughn a printing credit, to which Vaughn never asked for, and never wanted, but Vaughn contested, asked for the credit to be given back to the university, as Vaughn, wished to speak with his own cash, coin, to pay for the printing. Further, the defendants and opposing counsel, never denied nor refuted, Vaughn, asked for in relief, the court, return the free credit from Missouri State University given to Vaughn, from Flannery, to which Vaughn never wanted, nor asked for—rather, they simply continued arguing, from an event they allege Vaughn was never at, that he was advocating the opposing counsels third statement of claim, statement three, cash free.

In addition, Vaughn continued seeking injunction to halt the abridgement of press, abridgment of speech, prior restraint, concurring then, as now, by viewpoint—and the defendants and opposing counsel moved to justify the right of the public university to deny use of cash to speak to pay for printing non course related viewpoints, non-university related topics, nonacademic press, arguing since high school administration may bar students in Hazelwood, and Nelson Moline from the freedoms of press, speech, the administration of Missouri State University, Board of Governors in Missouri State University, and Missouri State University Administrator Sean M. Flannery, alongside the Information Services of Missouri

State University, have authority to abridge the Vaughn's own, student cash, coin, currency, as speech, to pay for the printing without broad viewpoint abridgment, and their authority to broadly abridge the press, printing, use of technology, from disabled Vaughn, on the basis of broad content, topic, purpose, viewpoint discrimination and prior restraint. I.E., as corroborated from Vaughn's entire statements and claims, as Justice Story would require us to do, all college student, and alumnus Vaughn wanted to do, was use his cash, coin, currency, to speak and pay for printing, use printers, use technology to print without broad content, viewpoint abridgment, at the public printing forums, public computer labs, public library of Missouri State University, and to similarly print without broad abridgement on content, topic, purpose, viewpoint, at the same public printing forums, public computer labs, public library, of Missouri State University. Alas, the conflict remains, and as the opposing counsel has said, "Vaughn is not free to use the printers, even if he uses his own cash."

Vaughn also documented, his situation trying to use printers at MSU, and the defendants and opposing counsel, go so far as to argue against the guarantees of Brown v. Board of Education, and agree—other public libraries exist, he can go there to use his cash, to speak and pay for, to print, the United States Constitution, the Virginia Resolutions, Various Federalist Papers, and even discussions, on how to amend the constitution, for women to have their voice heard: all from the

defendants of a university, whose mission is to educate ethical leaders in democracy; none allowed printed.

From this point, combined with the incapacity for Vaughn to communicate, due to disability, and the courts refusing the grant communications accommodations, on the basis he could not communicate effectively—Vaughn was denied equal protections of laws, denied due process, denied summary judgments, denied halting the constitutional harms of abridged press, abridged speech, and denied the dignity of even being heard, as an equal American, with equal rights.

In brevity—Vaughn, came to know a hard truth—America is not for everyone, unless everyone requests the laws, be held, as they are read, equally, for them, as anyone else. He came to know, although wheelchair ramps led up to the district and appellate courthouse, the court did not understand him, and there would not be any Justice, or service at the top of those ramps; any and all accommodations by law, he needed, were denied. He knew the court was judging the lack of ability for them to understand him, on his expressions from autism, adhd, and writing disabilities, to deny him the critical piece of basic dignity, for him to bring suit, be heard, and be judged on the merits, denying protections of the laws, depriving liberties, and due process themselves, on the basis Vaughn could not communicate, not by the accommodations the law provides, but on the basis of the judgments the courts gave, upon

unaccommodated Vaughn attempting to function, and communicate, whilst deprivation of the laws, he made a choice, and persisted; that he may be heard, with law.

Justice never came—Vaughn was never heard, nor heard with protections of the laws; the cold winds that reap without law, did happily howl, under a scorned, sunset of law, onto a morning of hope, that never rose, but fell frosted like frozen petals, forever lost.

The appeal of 23-2962 is the case that comes before the court—the eighth circuit court affirmed the district court' use of the non-corroborated hearsay of the opposing counsel' statement of claim, not Vaughn as truth, ignoring the admission of the defendants under affidavit of willfully abridging press, speech, even with Vaughn having requested a Jury, from the beginning after the malaise of being considered by the lower courts, not abled enough, to be given merits of due process of the laws, equal protections of the laws, nor to be retained with liberty, with due.

## ARGUMENT

### JUDICIAL CONFERENCE 255

1. Vaughn was deprived of protections of laws, of Judicial Conference 255, § 255 Services to the Hearing Impaired and Others with Communication Disabilities. Vaughn is autistic, has severe adhd, severe writing barriers, not than from conveyance of thought to paper, organization of thoughts, organization of thoughts onto paper, focus, coming back to task, planning ahead, executive function, being clear without repetition, seeing errors, knowing or being aware of errors, amongst other barriers that come with this. On January , dockets, and , the district court, without due processes of the § 255, or any communication accommodations to be present, communicate, heard, functional, understood, deprived Vaughn of protections of laws, § 255, whilst simultaneously, in docket, , acknowledging the prior restraint viewpoint discrimination occurring, cognitive communication disabled Vaughn, attempted to convey, and further deprived Vaughn of liberty of press, speech, without abridgment by viewpoint, prior restraint—all without due process of the laws given. The actions by the lower courts, then becomes precedential, communication accommodations are mandated, however, not to all communication disabled Americans, thus from the lower courts, are now, all eighty million or so, disabled Americans, citizens, with equal protections of the laws, as the district, and eight circuit court of appeals—justified depriving the equal protections of § 255, without giving due process, on the basis, they could not understand the autistic, adhd, writing disabled Vaughn.

§ 255 Services to the Hearing Impaired and Others with Communication Disabilities, mandates, all Justices “a) Under Judicial Conference policy, a court must provide sign language interpreters or other auxiliary aids and services to participants in federal court proceedings who are deaf, hearing-impaired or have communication disabilities and may provide these services to spectators when the court deems appropriate (JCUS-SEP 95, p. 75). This policy provides for services in addition to those required by the Court Interpreters Act (28 U.S.C. § 1827)

(b) The court should honor a participant’s choice of auxiliary aid or service, unless it can show that another equally effective means of communication is available, or that use of the means chosen would result in a fundamental change in the nature of the court proceeding or an undue financial or administrative burden.”

Equal protections of the laws, of the fourteenth amendment mandates the courts, having given Vaughn, equal protections of Judicial Conference 255; they did not. Vaughn argues, since, Judicial Conference 255 has not been called into question by the lower courts, rather merely not given, it is indeed, a constitutional act by Congress, with section five of the fourteenth amendment, to enforce right to redress, right to be heard, right to due process itself, by reasonable accommodations.

#### **Disability Accommodations, Supplemental Pleadings, and Circuit**

#### **Splits**

“§ 2072. Rules of procedure and evidence; power to prescribe”

“(b) Such rules shall not abridge, enlarge or modify any substantive right. All laws in conflict with such rules shall be of no further force or effect after such rules have taken effect. (c) Such rules may define when a ruling of a district court is final for the purposes of appeal under section 1291 of this title.”

D.C., First, Second, Fourth, Ninth, and Federal Circuits, accept the Scahill v. District of Columbia, No. 17-7151 standard of accepting curable defects and allowing supplementary pleadings—to correct a deficit. The Seventh, Eighth, Tenth Circuits require plaintiffs to establish standing at the time of original filing. In the eighth circuits, Park v. Forest Service of U.S., declared plaintiffs must be standing, from the original complaint; Vaughn sees no due process of laws, nor citizenship, if disabled americans ascend a courthouse, wheelchair ramp, to find, they are judged on the fact they cannot stand—or in this case give a statement of claim, without the protections of viable laws, to even understand them. It must be made known, in this case, the curable defect, is Vaughn’s disabilities—of which the court, refused the protections of the laws, that exist, for Vaughn to give the curable defects, for them to understand him. There are two, viable merits of claims in the case, from the beginning, until now—but the eighth circuit judged Vaughn on his incapacity to stand with a statement—without them giving him protections of laws—nor stare decisio of Stevens v. Redwing nor to give a statement. In the district court and eighth circuit, disabled Vaughn, has been judged, on his expression, as someone who

cannot give a claim they understand—not on the valid merits of 1. Abridgment of press, and 2. Abridgement of speech, but rather, as someone only worthy enough to be without protections of the laws, nor stare decisis. Therefore, it would appear due process of the laws, and ordered liberty, for fundamental rights, requires both protections of the laws be given first, and supplementary pleadings, to judged on pleadings, after. Respectably, the eighth circuit, and the district court, appear to have made a reversable error, but an error nonetheless denying Vaughn of fundamental aspects of American citizen: right to be heard with due process of the laws. The prescription of ordered liberty, being upheld so fundamental rights, for all may exist, as noted in Justice Thomas' concurrence, in Dobbs v. Jackson Women's Health Organization 597 US 2022, and by the courts decision in Timbs v. Indiana, 586, US 2019, suggest, the process, of protecting disabled Americans with process of law, first, is necessary to their even having the a fundamental right of any right to liberty, property, life, let alone, accessing courts of law, to bring suit, and protect them. As noted in Vaughn' treatment by the lower courts, on paper, he is protected by Judicial Conference 255, and to be reviewed by the court, Americans With Disabilities Act 1008 Amend. However, upon entry to court, and request of protections of Judicial Conference 255, or disability accommodations, no pleadings, by due process of the laws, were ever accepted—and instead, Vaughn was judged to be denied due processes of communications accommodations, granted as moot, or frivolous, on the basis the court could not

understand him, due to his disabilities. In fact, Vaughn has two statements of claims, that were glossed over, as not even worth the time of being understood—with a run to the hearsay, in the lower courts, not based in reality, nor fact—as the concrete understanding of the case—to deny accommodations, to even hear Vaughn, or understand the conflict. Thus, Vaughn argues, Judicial Conference 255, and if reviewed the Americans With Disabilities Act 1990, 2008 Amend, requires of the court, as due process of the law, not abridging the right, by way of their authority in FRCP “§ 2072, guide the lower courts on the circuit split over supplemental pleadings and decide whether they be accepted once due process of the laws of communications accommodations are given.

#### **AMERICANS WITH DISABILITIES ACT 1990, 2008 AMEND**

As the court held for damages in Perez v. Sturgis Public Schools, et al. 598-US 2023, Vaughn argues similarly, since Judicial Conference 255, only cover communication disabilities—which the lower courts, deprived Vaughn of, from not comprehending expression's from Vaughn's unaccommodated autism, adhd, writing impairments as merit to deprive him of protections of the § 255 —and given § 255 is restricted to communication disabilities, Vaughn argues, the Americans With Disabilities Act, coving all disabilities, applies, in United States Court, and all proceedings of United States Courts,

with broad, reasonable accommodations of disabilities, as the law provides, for public facilities.

Directly from the information web-page on the 8<sup>th</sup> circuit court of appeals Americans with disabilities Act, the court comments, "The Americans with Disabilities Act does not apply to the federal judiciary." However, combined with the intent, findings, purpose, of Americans With Disabilities Act 2008 Amend, and the language of 42, it is clear, nothing bars the Americans With Disabilities Act 1990, 2008 amend, as applicable, to the United States Courts, federal judiciary, and all proceedings therein, to accomplish the goals of the broad national mandate, of the laws, and grant all eighty million Americans, the right to access, bring suit, communicate, give statements, be heard, be functional, be understood, in The United States Courts, with broad reasonable accommodations, as in the local State Courts of law, by Tennessee v. Lane, 541 US 509. It is not necessary for Vaughn to argue for the reading, interpretation, application of the Americans With Disabilities Act onto the state courts, rather, the review of the 2008 amend in the equal branch of Congress' response to the previous supreme court cases diminishing ada 1990—in combination with the equal protections of fifth amendment, fourteenth amendment due processes of laws, and whether Congress acted with authority, mandate Vaughn, and all disabled Americans,

equally protected by the ada 1990, 2008 amend, in United States Courts, the federal judiciary, and all proceeding therin.

Argument, language of the Americans with disabilities act already applies onto the local states—and Vaughn has been denied protections of the ada—in this case, and others\*. In this case, the opposing counsel argued the procedural protections, Vaughn sought on appeal, by 23-1281—were substantive, that Vaughn was not given a right to be heard, with protections of the laws, for him to communicate, be functional understood. The courts refused to halt the discrimination, the law provides remedy for—and denied the motion for damages of the blockade of due process of law by the opposing counsel and defendants.

The United States Supreme Court, stated in *Tennessee v. Lane*, disabled Americans have a **RIGHT** to accommodations, including counsel, if needing to be heard, access the services, fully participate, benefit from courts of law in the United States of America. “As it applies to the class of cases implicating the fundamental right of access to the courts, Title II constitutes a valid exercise of Congress’ authority under §5 of the Fourteenth Amendment to enforce that Amendment’s substantive guarantees.” The court extended the broad reasonable accommodations of the Americans With Disabilities Act, onto the state courts. The court has yet to consider the full language of the

Americans With Disabilities Act, including whether the federal judiciary and the United States Courts, are bound by the law, or its antecedents. The primary concern, from dissent of Justice Thomas, in *Tennessee v. Lane*, 541 U.S. 509, was of an eleventh amendment matter, and whether Congress acted with authority to enforce the fourteenth amendment.

The difference, here, is Vaughn is arguing, The proper reading, of the Americans With Disabilities Act and ada 2008 amend, alongside the court cases, congress rebuked in the law, by their equal branch, and the original finding, intent, purpose, laid out in the law, of 1990, and 2008, is applicable to the United States Courts, and the federal Judiciary.

Of Recent, The Court ruled, *Endrew F. v. Douglas County School District*, bare

In *Dobbs v. Jackson Women's Health* 597 U. S. \_\_\_\_ (2022), the United States Supreme Court reiterated, due process, is a process. Honorable Justice Thomas in concurrence, gave a signpost to what procedures, fundamental rights are. The Late Honorable Justice Ginsburg was quoted as also reiterating means to understanding, fundamental rights, not explicitly written in the Constitution. The Americans With Disabilities Act 1990 requires, broad, reasonable accommodations. Judicial Conference 255 Requires the court, shall provide services to communication disabled Americans, and the fourteenth amendment requires equal protection, application—and due process. The Americans With Disabilities Act 2008

Amend—look to referenced court cases within the law, answers by their equal branch to the Judiciary—with a restoration, of intent, findings, purpose of Americans with disabilities act 1990, to allow all Americans, including all disabled, to fully participate, benefit, from all aspects of society, and public entities—including The United States Courts of Law.

To The Court, on how you can help Vaughn and the American public, this case, shall be joined with an injunction on the two claims of the case, to halt the constitutional harms. Vaughn, is unable to meet the various requirements, formatting, citations, in this case, because, he has climbed a mountain of wrong, to get to you. It is not that he does not know how to write like a lawyer, nor think like one, nor know many of the various ideas that stir your soul, and the conversations that have happened throughout the course of the American experiment. NO. He found himself, after fourteen years of his undergraduate studies, and failing almost all writing intensive courses, both due to severe disabilities, now needing to redress, and no-one coming to help, and the lower courts not advertising that disabled americans need not apply—but in that cold belly of wrong, he found a light in his soul, and I hope you look past the imperfections of this petition, and realize the millions of lives, this case shall improve, and allow for the needed constitutional discussion, and resolution to circuit splits, so that rich or poor, disabled, or not, we may advance to be a union for ALL Americans.

### **Conclusion,**

To the fields of Steel Magnolias, Ninos, and all the angels above, I pray, for laws, of God, to be heard and transcend on-to below, that no more, may heaven-duly-mourn, nor man be tormented by the winds of his own injustice, but live by endowments of God, through documents of this nation, as the natural gifts, to man-kind, of all, by all, for all, for-ever-more; may this court, impartially guide, resolve, ALL Americans, be citizens, **EQUALLY**, disabled or not, rich or poor, that Justice, and Liberty, with due, **IS**, by **GOD**, for **ALL**. I kindly request help, and conclude, with desperation and gratitude; may it please the past, and future of this republic.

Sincerely, CDV.

Counsel on Record

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