Case No___23-7080____

IN THE SUPREME COURT OF THE UNITED STATES

CURTIS DWAYNE VAUGHN

PETITIONER

V.

MISSOURI STATE UNIVERSITY ADMINSTRATOR SEAN FLANNERY, ET AL.

RESPONDENTS

ON PETITION FOR REHEARING BEFORE THE SUPREME COURT OF THE UNITED STATES, OF WRIT OF CERTIORARI FROM THE EIGHTH CIRCUIT

PETITION FOR REHEARING

Counsel on Record (Pro-Se Petitioner)

Curtis D. Vaughn

417-718-0156

vau123@live.missouristate.edu

1825 East Republic Rd. Apt 6404

Springfield, Missouri 65804

To stop discrimination on the basis of race—and—disability is equally, to stop discriminating on the basis of race—or—disability. Yet, on April 29th, 2024, The United States Supreme Court, passed the baton, below the bar of the fourteenth amendment, with more support, than antebellum 1857. The court drew not upon shades of skin, rather, whited out Constitutional and Congressional law, mandates, upon the colors, attributes, ink of Vaughn' disability—the court ruled the amendments declaring inequality incongruent with citizenship, beith an outlawed practice de jure, for the disabled—to be deprived of liberty—to even have due process of the laws, before deprivation of life, liberty, property.

A) **AMENDMENT FOURTEEN, ONE, USC 1983 AND STANDING:**

1. The two statements of claims, of the Missouri State University Official Sean Flannery, the Board of Governors, and Missouri State University, a. abridging the press, and b. abridging the speech—at the public computer forums, by pre-empting use of Vaughn' cash—to pay for print, use of printers, to print, to use technology to print, to lay his sentiments, without broad viewpoint, content, topic, purpose censor-- throughout this and all foregoing pleadings, appeals, cases, of Vaughn v. Flannery, have standing by---amendment one, fourteenth, USC 1983, Citizens United v. Federal Election Commission, 558 U.S. 310, Good News Club v. Milford Central School, 533 U.S. 98, Rosenberger v. Rector and Visitors of the University of Virginia, Papish v Board of Curators of Missouri 410 US 667, 515 U.S.

819, PERRY EDUCATION ASSN., Appellant v. PERRY LOCAL EDUCATORS' ASSN. 460 US 37, et al. Tinker v. Des Moines Independent Community School District, 393 U.S. 503, Near v. Minnesota, 283 U.S. 697.

The court intervened, reiterating standing, validity of Vaughn's claims, against affirmation of this court, eighth circuit, and the district court, in Lindke v Freed, 22-611 & O'Connor-Ratcliff Garnier, 22-324. The court held the freedom of press, freedom of speech, are fundamental rights, protected by the fourteenth amendment, with article three standing for USC 1983 contesting officials under color of official state regulations, statutes, policy, actions.

As these decisions occurred after the filing of the writ of certiorari, and denial of cert—and Vaughn was denied docketing a supplemental brief, the court is unaware of these intervening cases. The court, drove home, intervened, rebuked the erroneous district court holding—of liberties of press, speech, not being free from suppression by government defendants, by viewpoint discrimination, prior restraint. The court restored Vaughn v Flannery 22-3301 all the way thru 23-7080, to article three standing, by further affirming liberties of fourteenth and first amendments of the United States Constitution—in NRA v Vullo 22 842, —and intervened, rebuked the district court allegation the first amendment and fourteenth amendment do not prohibit content based prior restraint, censorship, by viewpoint, content, topic, purpose—in Vidal v Elster, 22-704. The United States Supreme Court, drew a line, from Vaughns two original statements of claims and

arguments, (A "halt the abridgment of the press, and halt the abridgment of speech"), requests for relief (return the Missouri State University credit forced onto Vaughn—and allow him to pay with his cash), admissions and arguments by defendants, "There is no first amendment right to unrestricted (insert, for Vaughn to pay for) paid printing at (insert public forums of) public universities", District Document 32, 3/21/2021 "The first amendment does not afford the plaintiff a right to print non university-related-materials on university printers—even if he pays for such printing." District Document 32, 2/21/2023, "Missouri State University Bear Print Policy, Printing is provided for academic purposes and covered by the university's information technology acceptable use policy" District Docket 31-1, 02/21/2023— Petitioner kindly asks, the new term, to rehear, review the unconstitutional bear print policy, information technology use policy, remand to district court, upon Lindke v Freed, 22-611 & O'Connor-Ratcliff Garnier, 22-324, NRA v Vullo 22-842, and Videl v Ester, 22-704, and prior stare decisis of this court.

B) FBI v. Fikre, 601 U.S. (2024)

1. Between the March 10th 2024 filing and April 29th 2024 denial of writ, another case was handed down—and the supplemental brief was not allowed filed; the court intervened, that the defendants, have a burden to establish they cannot reasonably be expected to resume their challenged conduct, FBI v. Fikre, 601 U.S. ___ (2024), The defendants did the opposite: "In Fact, plaintiff tactily admits that he can (speak with his cash to pay for print) and print (without broad viewpoint discrimination,

prior restraint, censor) his non-university-related materials at a local public library "with no hassle"' District Document 32, 2/21/2023, and again—The Missouri Bear Print Policy, a policy, regulation, actions by defendants under color of state of Missouri, applicable to USC 1983, first and fourteenth amendment standing- "printing... is for academic purposes" (at the public forums, even if individuals attempt to pay—for non academic views, they will be denied) Document 32-1, 2/21/2023.

2. In FBI V FIKRE, the court intervened with the district court's lack of fact finding, just as in Vaughn's case, the district court failed both to determine actual legal claims and demonstrate the two first amendment claims were moot, failed to hear the correct statements of claims, failed to resolve those properly—by stare decisis:

C) OF DISABILITY

1. The court intervened, by the decision in FBI v FIKRE 601 _US 2024, Thornell v Jones, 602_US 2024 Vidal v Elster 22-704, and Starbucks v McKinney 23-367, highlighting—the writing disabled petitioner—is prejudiced against his own statements, without broad reasonable accommodations, the law requires, and ripened the two questions of the writ, for rehearing, review, remand. All parties, including Vaughn have been stuck in written pleadings—on the basis of lack of ability to understand cognitive communication disabled Vaughn. The courts refused disability accommodations, the 1995 judicial conference 255 law of question one, but

also on the basis the eighth circuit court prohibits amended pleadings, or supplemental pleadings of actual article three claims, controversies, so that congressional and constitutional law being given, to know of the claims.

2. In Starbucks v McKinney, intervened cognitive communication disabled Vaughn—must establish likelihood of succeeding on merits, that he is likely to suffer irreparable harm in absence of preliminary relief, the balance of equites in his favor, and the injunction is in public interest. But Vaughn cannot do this, Vaughn has been declared unable to give a statement of claim, "plaintiff alleges he has autism", Harpool, Vaughn v Missouri 23-3040, with doctors note of fact, on the docket—"plaintiff alleges he was a U.S. Senate Candidate", Vaughn v. Proctor 22-3306. "Plaintiff alleges he wanted to leave the political Party", Vaughn v Ashcroft 22-3284. And in Vaughn v Flannery, 22-3301, "To begin, plaintiff's allegations are not entirely clear" Harpool, District Document 77, 7/13/2023.

Vaughn is communication disabled American, who cannot give a statement of claim—without equal protections of the laws, due process of the laws—the supreme court intervened in Starbucks v McKinney 22-367, mandate Vaughn to convey.

3. However, Congress fleshed out how for communication disabled Vaughn is mandated by the courts, to be allowed to meet this barrier in 1995, at the September judicial conference—and with judicial rule 255:

" COMMITTEE ON COURT ADMINISTRATION AND CASE MANAGEMENT SERVICES TO PERSONS WITH COMMUNICATIONS DIABILITIES The judiciary has long been on record as

supporting full access to judicial proceedings by all segments of the disabled community. See, e.g., JCUS-SEP 94, p. 50 (use of appropriated funds for sign language interpreters); JCUS-SEP 94, p. 68 (accessibility of courtrooms and related judiciary facilities). In an effort to improve access by individuals who are deaf or hearing-impaired and persons with other communications disabilities, the Judicial Conference, modifying a recommendation of the Court Administration and Case Management Committee, adopted a policy that all federal courts should provide reasonable accommodations to persons with communications disabilities. The Conference further agreed to require courts to provide, at judiciary expense, sign language interpreters or other appropriate auxiliary aids to deaf and hearing-impaired participants in federal court proceedings in accordance with guidelines prepared by the Administrative Office. This requirement does not apply to spectators, nor does it apply to jurors, whose qualifications for service are determined under other provisions of law." The guidelines to implement these policies will be developed by the Administrative Office, under the supervision and subject to the approval of the Court Administration and Case Management Committee and the Conference."

In addition to United States Judicial Conference rule 255, the federal rehabilitation act 1973 section 504 mandates broad reasonable accommodations are provided, of all facilities, organizations, entities receiving federal funding, including the federal courts. Vaughn still contends the broad national mandate of the letters of the 2008 amend of the Americans with disabilities act mandates the United States Courts give broad reasonable disability accommodations, in all services, pleadings, hearings, as well.

D) Royal Canin v Wullschlenger 23-677

1. On the same day the court denied the cert of Vaughn v. Flannery 23-7080, the court agreed to hear another case on supplemental/ amended pleadings. The court, should have merit, to grant rehearing, review the supplemental split prohibiting due process of laws that are needed given—correct, remand with consideration of Royal Canin v Wullschlenger.

The barrier to implementing 255, federal rehabliation act 1973 section 504, Americans with disabilities act, due process, is the circuit split—Park v. Forest Service of U.S of the eighth circuit, Southern Utah Wilderness Alliance v. Palma of the tenth circuit, Pollack v. U.S. Dept. of Justice of the seventh circuit and on the other side, Travelers Ins. Co. v. 633 Third Associates of the second circuit, Northstar Financial Advisors, Inc. v. Schwab Investment of the ninth circuit, Prasco, LLC v. Medicis Pharm Corp of the ninth circuit, United States ex rel. Gadbois v. PharMerica Corp of the first circuit, Scahill v. District of Columbia, 909 F.3d 1177, 1179 (D.C. Cir. 2018). Petitioner asks the court to rehear and consider the two questions of the amended pleadings, of Vaughn v Flannery 23-7080, alongside Royal Canin 23-7080, so that Vaughn is granted due process of fifth, fourteenth, and can communicate—either the four elements required in injuctive relief—or statement of claim, statement of relief, fact, evidence, harm, or even pleadings themselves.

Vaughn comes to the court, not for first, fourteenth amendment standing requests—the court ruled Vaughn's complaint has standing, before, during, after denial of writ—during entirety of complaint—at odds with the district court. Vaughn comes to the court, as an American with cognitive communication disabilities, who is barred from accessing the courts, bringing suit, being heard—as the district court, the eighth circuit, and in the supreme court denial of cert, affirmed, disabled Americans—are worse off than Dredd Scott in 1857—and Vaughn cannot convey, plead, give statements of claims, without disability accomodations. This court, and the lower courts have ruled, at odds with the laws—and their own decisions, that no longer may one drop of blackness deny citizenship, but—now, upon one drop of ink from a disabled American, pleadings are automatically mooted, whited out from constitutional requirements of Justices even hearing them, knowing their claims, evidence, allowing them to convey—and all broad reasonable accommodations, guaranteed by Congress and Constitution, are denied, and the disabled, on the color of disability, are removed from court; that is what concerns question one, and question two—the remedy is not what the law should be, but of what the first, fifth, fourteenth amendments, alongside the 1995 judicial conference disability accommodations rule 255, federal rehabilitation act 1973, americans with disabilities act, say, and mandate onto the United States Courts—and all proceedings, therof, as due process and equal protections of the laws.

CERTIFICATE OF INTERVENING, SUBSTANTIAL, CONTROLLING EFFECT

1. The court intervened the prior ruling, establishing Vaughn's statements of claims, requests for relief, with standing throughout entirety, via Lindke v Freede, O'Connor v Ratcliff Garnier, NRA v Vullo, and Vidal v Elster; Vaughn was not allowed supplemental brief to notify. 2. The court intervened, countered the district court, on lack of fact finding, lack of proper legal standing, and lack of disability accommodations onto Vaughn, to communicate, plead, make the case, in FBI v FIKRE 601 _US 2024, Thornell v Jones, 602_US 2024 Vidal v Elster 22-704, and Starbucks v McKinney 23-367,in FBI v FINKE, and DIAZ V United States. The court opened similar intervened the two writ questions, by taking a Royal Canin v Wullschlenger. 5. Motion for Due Process of Laws and Supplemental Brief, were denied, controlling Vaughn from needed disability accommodations, to be heard, to function, to give statements of claims, to have stare decisis—of Tennessee v Lane, Griffin v Illinois, Near v Minnesota, Timbs v Indiana, Betts v Brady, and judicial conference 255, Americans with disabilities act 1990 and 2008 amend, federal rehabilitation act 1973 accommodations.

I Curtis D. Vaughn do declare the forgoing intervening, controlling factors, are upon which grant the grounds for rehearing.

/S/ Curtis D. Vaughn

Nine words, to the court, eternal; summarily, I conclude:

Deprivation

Of

Liberty,

Without

Process,

Nor

The

Laws,

Given.

For liberty & weigh; impartially Just, unto all, I pray,

/s/ Curtis D. Vaughn

Certificate of Counsel On Record

Curtis D. Vaughn (Petitioner Pro-Se)

417-718-0156

vau123@live.missouristate.edu

1825 East Republic Rd. Apt. 6404

Springfield MO 65804

In Good Faith

"This document is filed on May 24th, 2024, twenty-fifth day of the twenty-five-day window of redress for rehearing. This document, is mailed promptly to, by priority USPS mail, 901 S National Ave Springfield Missouri: Sean Flannery, The Board of Governors, Computer Services of Missouri State University, and although misrepresented as qualified counsel of record-when in fact, the defendants chose to use a non-supreme court bar qualified counsel on their team, to file, Caleb Hunt AND Bryan Wade, Husch Blackwell, 3810 East Sunshine St, ste. 300, Springfield MO 65809, and the United States Supreme Court, 1 First Street Northeast, Washington D.C. 20543.", Curtis Vaughn May 24th, 2024, Original filing of Petition for Rehearing.

This document is returned to the United States' Clerk's Office, by request for correction, within the fifteen days required by United States Supreme Court Rule, 44.6. Of notice, Husch Blackwell, acted in be bad faith, deliberately filing a waiver, granting the defendants an advantageous supplementary response to deny allegations in Vaughn's writ later, after choosing to file by the non-bar qualified

attorney on the team, deliberately withholding response by United States Supreme Court bar qualified attorneys on the team—Stephen F. W. Ball, Jr., John W. Borkowski, Joseph S. Diedrich, Laurie A. Haynie, Don J. Mizerk, Jeffrey T. Nobles, Tyler M. Paetkau, Michael T. Raupp, JoAnn T. Sandifer, Derek Schmidt, Philip D. Segrest Jr., Danny G. Solomon, Derek T. Teeter, Jules S. Zeman, Marc R. Wezowski. As attorney Caleb D. Hunt, does not meet the rules of the court requirements to be counsel of record and was made aware in December 2023 the defendants needed counsel to meet requirements of laws—and Attorney Hunt declared persons of Husch Blackwell United States Supreme Court bar qualified attorneys, —were to "deal with it" Caleb Hunt, and given Vaughn is unaware of defendant's counsel of Record per the rules of the Supreme Court, Vaughn, mails the defendants Directly. A Copy is mailed to, Missouri State University Board of Governors, Missouri State University Administrator Sean M. Flannery, Missouri State University Information Services/Computer Services, at 901 South National Avenue, Springfield Missouri 65897 and to the clerk of the United States Supreme Court, one first street, Washington DC, 20543.

28 US 1746,

I declare under penalty of perjury that the foregoing is true and correct, without due process of the laws ever given, and with best function, in good faith as a disabled American rejected from equal protections of the laws, constitution, citizenship. Executed on 6/21/2024.

Curtis Dwayne Vaughn