

No. 23-7667

In The
SUPREME COURT OF THE UNITED STATES

RENEE A. CHRUSTOWSKI, BS, PRO SE,

Petitioner

v.

NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE
(NAACP), DERRICK JOHNSON, et al,

Respondent(s)

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES
SUPREME COURT WASHINGTON D.C. FOR THE FEDERAL CIRCUIT

PETITION FOR A REHEARING

Renee A. Chrustowski, BS, Pro Se

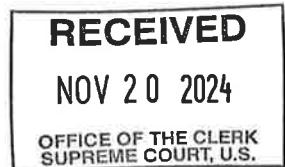
Counsel of Record

711 Wood Duck Court

Middletown, DE 19709

Tel: (302) 373 – 8003

November 15, 2024



CORPORATE DISCLOSURE

The Petitioner, Renee A. Chrustowski, BS, Pro Se is an employee of "Free Will;" Pursuant to Rule 29.6 of The Supreme Court rules, the petitioner is not a publicly held corporation; therefore, there are no parent, sister, brother, or cousin corporations and no publicly held company owns 10% or more of petitioner's stock.

TABLE OF CONTENTS

1. Corporate Disclosure Statement.....	i
2. Table of Contents.....	ii
3. Table of Authorities.....	iii - v
4. Petition For A Rehearing.....	1 - 5
Introduction.....	1
Background.....	1 - 2
Reasons For Granting a Rehearing.....	2 - 5
Conclusion.....	5
5. Certificate of Compliance.....	6
6. Certificate of Service.....	7 - 8
7. Appendix.....	9 - 11

TABLE OF AUTHORITIES

<i>Renee A. Chrustowski v. NAACP, Derrick Johnson, et al.</i>	1 - 4
(ECF Nos, 6, 8), motions to appoint pro bono council was denied	
(September 21, 2023), 28 U.S. C. 1915 (D.I.6), forma paupris	
was granted (July 7, 2023), (E.D.P.A. No. 1-23-cv-03692),	
petition for a rehearing and the court en banc was denied	
(Feb 23, 2024), No. 23-2812	
<i>Renee A. Chrustowski v. Louis De Joy, Postmaster General</i>	1 - 4
(USPS), et al 28 U.S.C. 1915 (e), 3d Cir. LAR 27.4,	
3d Cir. I.O.P. 10.6., 28 U.S.C. 1291, 28 U.S.C. 1915 (e)(2)(B),	
motions denied, motions to consolidate cases denied, 3 cases dismissed	
without prejudice (October 17, 2023), motion to proceed in forma paupris	
granted, (September 29, 2023) No. 23-2926, 23-2927, 23-2928	
<i>Renee A. Chrustowski v. Cumberland County Guidance Center, et al.</i>	1 - 4
28 U.S.C. Section 1915 (e)(2), L.A.R. 27.4 and I.O.P. 10.6	
dismissed and motions denied with discrimination (2023),	
Local Civil Rule 40.1, request to reassign case to a new judge	
was dismissed without discrimination, 23-3112-RMB/SAK	
(July 7, 2023), 3d Cir. L.A.R. 106.1 (a), to seal all documents,	
records, and exhibits was denied without prejudice (December 20, 2024),	
petition for a rehearing granted (March 4, 2024), No. L-280-06	
(December 20, 2006), 1:23-cv-03112	
<i>Renee A. Chrustowski v. Archer & Greiner, et al.</i>	1 - 4
No. 1:23-cv-22010-RMB-EAP, letter received from the court regarding the	
status of petitioner's forms (February 7, 2024)	

TABLE OF AUTHORITIES CONTINUED

<i>Renee A. Chrustowski v. Paul Scull, Law Offices, et al.....</i>	1 - 4
No. 1:24-cv-00038-CFC (2023)	
<i>Renee A. Chrustowski v. Best Buy.....</i>	1 - 4
No. 1:24-cv-00036-CFC, motion for forma pauperis granted (February 13, 2023), docketed record of appeal to the Third Circuit	
<i>Renee A. Chrustowski v. Brown, et al.....</i>	1 - 4
No. 1:23-cv-21194-RMB-SAK (October 16, 2023)	
<i>Renee A. Chrustowski v. NAACP, Derrick Johnson, et al - U.S. Equal.....</i>	1 - 4
Opportunity Commission, 29 C.F.R. 1614.110, No. 530-2024-00378, (October 17, 2023)	
<i>Renee A. Chrustowski v. USPS, Louis DeJoy (Postmaster General), et al.....</i>	1 - 4
U.S. Equal Opportunity Commission, 29 C.F.R. 1614.110, No. 530-2024-00102X, (January 14, 2023)	
<i>Renee A. Chrustowski v. USPS, Louis DeJoy (Postmaster General), et al.....</i>	1 - 4
National Labor Relations Board (NLRB), 29 U.S.C. 151-169, No. 04-CA-327904(8)(a)(1)(5), (October 13, 2023), No. 04-CA-326726(8)(a)(1)(3), (October 6, 2023)	
<i>Renee A. Chrustowski v. USPS, Louis DeJoy (Postmaster General), et al.....</i>	1 - 4
National Labor Relations Board (NLRB), National Rural Letter Carrier Association (DERLCA 78 -RCA), 29 U.S.C. 151-69, No. 04-CB-333801(8)(1)(a), (January 18, 2024)	
<i>Renee A. Chrustowski v. USPS, Louis DeJoy (Postmaster General), et al.....</i>	1 - 4
U.S. Federal Labor Relations Authority (FLRA) 5 U.S.C. 7116(a)(b)(2)(4)(5), No. eOGC015532, (August 9, 2023)	

TABLE OF AUTHORITIES CONTINUED

<i>Renee A. Chrustowski v. NAACP, Derrick Johnson, et al.....</i>	1 - 4
Petitioner files an on-line complaint with the Better Business Bureau (BBB),	
<i>Renee A. Chrustowski v. Best Buy, No. 175290-19909114, April 4, 2023</i>	
<i>Renee A. Chrustowski v. NAACP, Derrick Johnson, et al.....</i>	1 - 4
Petitioner files an on-line complaint with the Better Business Bureau (BBB),	
against the Apple Store, No. 21630686, April 27, 2024	
<i>Renee A. Chrustowski v. NAACP, Derrick Johnson, et al.....</i>	1 - 4
Petitioner files an on-line complaint with the Better Business Bureau (BBB),	
against Ranchero Vibes, on-line store, No. 21551592, April 20, 2024	

PETITION FOR A REHEARING

INTRODUCTION

Renee A. Chrustowski respectfully petitions under Rule 44.2 for a rehearing of The U.S. Supreme Court's October 7, 2024 order denying her petition for a writ of certiorari. Substantial grounds not previously presented and postdating her petition's first distribution merit reconsideration of her case. The courts rule 44.2 authorizes Renee A. Chrustowski a rehearing based on intervening circumstances of substantial effect. This is an appropriate case for a rehearing, because Renee A. Chrustowski has been in litigation for over 18 years battling employment discrimination, harassment, and retaliation against her by the National Association for the Advancement of Colored People, et al, the United States Postal Service, et al, and other undesirable employment agencies without reasonable compensation from the court. With the court's denials of her petition, it will make it difficult for her to obtain the benefits, monetary compensation, and rewards that she is entitled to for her cases. There have been extraordinary circumstances wholly beyond the control of the petitioner, which has caused her to be without counsel. However, Renee A. Chrustowski was issued grounds for a writ to sue the United States Postal Service on April 24, 2023 and the National Association for Advancement of Colored People on February 14, 2024 by the Equal Employment Opportunity Commission.

BACKGROUND

The petitioner provides substantial evidence within her cases that presents discriminatory actions taken against her, because she filed a complaint against a federal agency and she was a victim of employment discrimination based on her protected race, age, color, religion, sex, marital status, national origin, alleged disability, genetic information, and reprisal. The agency's actions affected her because of the discrimination, which she was retaliated against by the United States Postal Service, when supervision terminated her employment because she filed protected Equal Employment Opportunity claims, Equal Employment

Opportunity Commission charges, Federal Labor Relations Authority, National Labor Relations Board, and Merit Systems Protection Board appeals. Furthermore, the agencies engaged in adverse actions against the petitioner in order to achieve diversity and to exclude the petitioner from employment, employment opportunities, proper training, pay, and benefits. The evidence that she provides within her cases suggests that there were inconsistencies, flaws, errors in law, and material factual or legal matter that was over looked in the court's decisions.

REASONS FOR GRANTING THE REHEARING

There was material facts and legal matter that was overlooked in the court's decisions. The courts failed to disclose a conflict of interest between the parties of interest and they abused their authority by accepting bribes, delaying the petitioner's cases for an extended period, and improperly communicating about the petitioner's cases publicly. First, the petitioner was incorrectly accused of committing improper conduct while working at the United States Postal Service. Second, the petitioner did not agree to the "bad faith bargaining," settlement agreement with the United States Postal Service and their union, the National Rural Letter Carriers Association, but she was excluded from the settlement by the black employees (NAACP), who used her grievances as retaliation against her. Third, the petitioners record suggests that she was unjustly removed from the Rural Carrier Associate position when she was given a 30-day removal letter in the mail on September 20, 2023 and on September 23, 2023, the petitioner was threatened by supervision to leave the United States Postal Service, Middletown Delaware. Fourth, on January 11, 2024, the petitioner was influenced to involuntarily resign from the Rural Carrier Associate position by a union representative. Fifth, the petitioner did not agree to rescind and expunge her record in exchange for voluntary resignation without reasonable compensation. Sixth, the respondents breached the petitioner's contracts and violated Title VII of the Civil Rights Act of 1964, Laws of Discrimination and violated the petitioner's 8th Amendment Rights, "Cruel and Unusual Punishment." For example, the petitioner was given rights under PEARA,

but the respondents denied that she met the burden of proof after she met 1 continuous year as a Rural Carrier Associate at the United States Postal Service. Furthermore, the respondents inflicted excessive and unnecessary fines on the petitioner by issuing her a “Letter of Demand,” requesting that she pay the respondents money back that she had earned for her training at the United States Postal Service. Seventh, the respondents accused the petitioner of “involuntary retirement” as a personnel action with the Merit System Protections Board, which was not correct.

The respondents engaged in misconduct and acted unethically towards the petitioner, which caused an error of law. For example, favoritism was shown towards people of color, National Association for the Advancement of Colored People members, younger individuals, men, individuals with families, family members, or single parents. First, the petitioner’s information and property were unlawfully seized and used against her, which caused her financial and physical damages. Secondly, the respondents unlawfully denied the petitioner pro bono counseling or legal assistance for her cases, which made it difficult to work on the case without legal training, education, or professional advice, and guidance. Third, the respondents denied that the petitioner had substantial evidence, when the petitioner presented her evidence. Fourth, the respondents created an abusive and hostile work environment. For example, they hindered the petitioner’s abilities, while harassing, insulting, defaming, slandering, and humiliating the petitioner’s work. Fifth, the respondents misused the petitioners’ money, information, and property while misrepresenting themselves and withholding money from the petitioner in a cruel way. Sixth, the respondents refused to provide proper training, information, or guidance, to the petitioner by giving incorrect information or misinformation, while the respondents manipulated evidence, tools, rules, regulations, or information, and they used coercive actions to intimidate, humiliate, or threaten the petitioner. Seventh, the respondents made false accusations regarding the petitioner’s paperwork, by incorrectly accusing the petitioner of not

sending her court documents to the court on time, filling the forms out incorrectly, or not paying the court fees. The petitioner has receipts, copies, and proof that her court documents, appeals, and petitions were sent to the court on time and were on point without deficiencies or flaws. Furthermore, the respondents played games with the phones, recordings, pricing, internet, wi-fi, laws, and rules, or regulations to exclude the petitioner from any type of advancement. Eighth, the respondents did not allow key witnesses to testify to the petitioner's knowledge or for her behalf. Ninth, the respondents compromised the petitioner's identity and did not use her information or property for the intended purpose. However, funds were fraudulently embezzled to extort the petitioner so the respondents could achieve diversity, exclude the petitioner from better employment opportunities, exclude her from any advancement, or proper job training and benefits.

The respondents made inappropriate changes in the law which occurred after the petitioner's cases were submitted, which was overlooked by the panel. First, the respondents allowed 2 or more representatives for the defending party at the United States Postal Service to testify or write oppositional briefs against the petitioner, which is not consistent with court rules or rule of law. The respondents neglected to eliminate one or more of the defending respondents when the petitioner requested to only have one respondent. Second, the respondents violated the petitioner's privacy rights by posting her civil action law suits on-line at a Villanova Law School without her consent, which violates The Office of Privacy and Civil Liberties of the Privacy Act of 1974. Third, the respondents made up a rule that 4 civil action complaints form the basis of "judicial misconduct," which was not found. Fourth, new laws have been passed since the petitioner's cases have been filed in 2006 and have been in litigation. For example, tax laws, gas laws, immigration laws, voting laws, and traffic stop laws have been passed or amended. Fifth, the police used the new laws against the petitioner as retaliation to discriminate against her when she cooperated with them. The respondents used unnecessary and excessive force to brutally harm her. Furthermore, the respondents discriminated against the

petitioner during court procedures by calling her claims “allegations,” implying that she was lying and by treating her as if she did not exist or was not in existence.

The opinion is in conflict with a decision of the U.S. Court of Appeals for the Third Circuit of Pennsylvania and The U.S. Federal Court of Appeals.

* * *

CONCLUSION

For the foregoing reasons, and those stated in the petition for a writ of certiorari, the Court should grant a rehearing, grant the petition for a writ of certiorari, and review the judgement of the court. Alternatively, The Supreme Court has jurisdiction over the case and the petition for a rehearing should be granted.

Respectfully submitted,



Renee A. Chrstowski, BS, Pro Se

Counsel of Record

November 15, 2024

CERTIFICATE OF COMPLIANCE

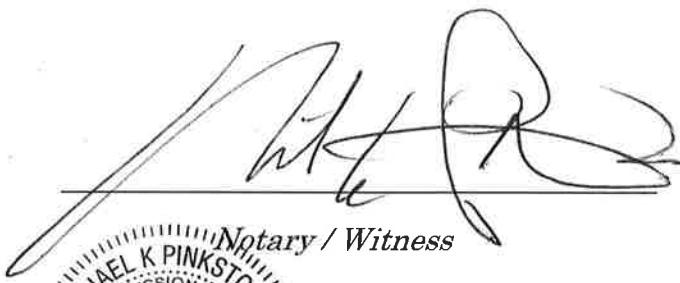
I Renee A. Chrustowski, BS, Pro Se certify that the petition for a rehearing complies with Fed. R. App. P. 32 Pursuant to Rule 44.2 of the Supreme Court and is presented in good faith and is on time containing 1,411 words, typed using Century 12-point font on a computer using Microsoft Word, excluding the parts of the petition that are exempt by the Supreme Court Rule 33.1 (d). I declare under penalty of perjury that the foregoing is true and correct:

Executed on: November 15, 2024

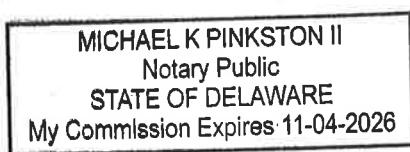


Renee A. Chrustowski, BS, Pro Se

Counsel of Record



11-15-24



CERTIFICATE OF SERVICE

I certify that on November 15, 2024, I Renee A. Chrustowski, petition for a rehearing as required by Rule 44.2, certificate of compliance, and certificate of service was served to the following respondents via First Class Certified United States Postal Service:

Supreme Court of the United States

1 First Street NE
Washington, DC 20543 – 0001
(202) 479 – 3011

NAACP

4805 Mt. Hope Dr.
Baltimore, MD 21215
(410) 580 – 5777

USPS

475 L'Enfant Plaza SW
Washington, DC 20260
(800) 275 – 8777

Archer & Greiner

1025 Laurel Oak Rd
Voorhees Twp, NJ 08043
(856) 795 – 2121

Cumberland County Guidance Center

2038 Carmel Road
Millville, NJ 08332
(856) 825 – 6810

Christian Life Center

670 S. Broadway
Pennsville, NJ 08070
(856) 935 – 6011

Life House Church

101 Karins Blvd.

Townsend, DE 19734

(302) 464 - 1035

Best Buy Headquarters

7601 Penn Ave. S

Minneapolis, MN 55423

(612) 291 - 1000

Paul Scull, Law Offices

151 N. Broadway STE 2

Pennsville, NJ 08070

(856) 678 - 0700

By: USPS CERTIFIED MAIL

Date: November 15, 2024

Signature: Renee A. Chrstowski

Renee A. Chrstowski, BS, Pro Se

Counsel of Record

Tel: (302) 373 - 8003

Date: November 15, 2024

APPENDICES

Page No:

APPENDIX A – Court of appeals P.A. opinion.....Pet. App. 1 - 4

Petitioner's motions to file exhibits and for rehearing, *Renee Chrustowski v. Cumberland County Guidance Center, et al.*, No. D.N.J. 1-23-cv-03112, 3d Cir. L.A.R. 106.1(a), motion to seal all documents, records, and exhibits denied without prejudice (December 20, 2024), petition for a rehearing granted (App. March 4, 2024)

APPENDIX B – Court of appeals P.A. opinion.....Pet. App. 1 - 4

Petitioner's remanded evidentiary hearing brief, *Renee A. Chrustowski v. NAACP, et al.*, No. E.D. P.A. 1:23-cv-03692, petition for a rehearing in the 3rd circuit en banc was denied, (App. February 23, 2024). Petitioners motion to seal denied, D.I. 1 and complaint dismissed 28 U.S.C. 1915(e)(2)(B)(i)(ii), (3rd circuit P.A., March 12, 2024). Petitioners' forma paupris granted 28 U.S.C. sec 1915(e)(2), (3rd circuit, P.A. October 26, 2023)

APPENDIX C - Court of appeals P.A. opinion.....Pet. App. 1 - 4

Petitioners motion to proceed in forma paupris granted, motions to consolidate cases denied and 3 cases dismissed without prejudice, *Renee A. Chrustowski v. USPS, Louis DeJoy, Postmaster General, et al.*, No. 23-2926, 23-2927, 23-2928 (App. October 17, 2023)

APPENDIX D - Office of the Circuit Executive P.A. opinion.....Pet. App. 1 - 4

Petitioners' complaint of Judicial Misconduct (28 U.S.C. 351et seq) against a federal judge was docketed, No. 03-23-90068 and 03-23-90069, (App. August 24, 2023), (App. December 27, 2023)

APPENDICES CONTINUED

Page No:

APPENDIX E – Court of appeals Camden N.J opinion.....Pet. App. 1 - 4

Petitioners' application to proceed in forma paupris denied, *Renee A. Chrustowski v. Archer & Greiner*, No. 1:23-cv-22010 (RMB-EAP), (App. November 9, 2023)

APPENDIX F – Court of appeals D.E. opinion.....Pet. App. 1 - 4

Motions to consolidate cases denied, three cases dismissed without prejudice, pending motions denied as moot, *Renee Chrustowski v. USPS, Louis DeJoy Postmaster General, et al*, No. 1:23-cv-00745-CFC, (App. October 17, 2023)

APPENDIX G - District Court of N.J. opinion.....Pet. App. 1 - 4

Letter requesting the court reassign petitioners' case to a new judge, *Chrustowski v. Cumberland County Guidance Center, et al.*, No. 1:23-cv-03112 (RMB/SAK), (App. July 7, 2023)

APPENDIX H – District Court of D.E. opinion.....Pet. App. 1 - 4

Petitioners case docketed, *Renee A. Chrustowski v. Best Buy*, No. 1:23-cv-00036-CFC, (February 13, 2023)

APPENDIX I – U.S. Equal Employment Opportunity Commission.... Pet. App. 1 - 4

Petitioners case filed, *Renee A. Chrustowski v. NAACP, Derrick Johnson, et al*, 29 C.F.R. 1614.110, No. 530-2024-00378, (October 17, 2023)

APPENDIX J – U.S. Equal Employment Opportunity Commission....Pet. App. 1 - 4

Petitioners case filed *Renee A. Chrustowski v. USPS, Louis DeJoy, (Postmaster General), et al*, 29 C.F.R. 1614.110, No. 530-2024-00102X, (January 14, 2023)

APPENDICES CONTINUED

Page No:

APPENDIX K – National Labor Relations Board (NLRB).....Pet. App. 1 - 4

Petitioners case filed, *Renee A. Chrustowski v. USPS, Louis DeJoy (Postmaster General), et al*, 29 U.S.C. 151-169, No. 04-CA-327904(8)(a)(1)(5), (October 13, 2023), 04-CA-326726(8)(a)(1)(3), (October 6, 2023)

APPENDIX L – National Labor Relations Board (NLRB).....Pet. App. 1 - 4

Petitioners case filed, *Renee A. Chrustowski v. USPS, National Rural Letter Carrier Association (DERLCA 78 – RCA)*, No. 04-CB-333801 (January 18, 2024)

APPENDIX M – U.S. Federal Labor Relations Authority (FLRA).....Pet. App. 1 - 4

Petitioners case filed, *Renee A. Chrustowski v. USPS, Louis DeJoy (Postmaster General), et al*, 5 U.S.C. 7116(a)(2)(4)(5), No. eOGC015532, (August 9, 2023)

APPENDIX N – Better Business Bureau (BBB).....Pet. App. 1 - 4

Petitioner files an on-line complaint with the BBB, *Renee A. Chrustowski v. Best Buy*, No. 175290-19909114, April 4, 2023

APPENDIX O – Better Business Bureau (BBB).....Pet. App. 1 - 4

Petitioner files an on-line complaint with the BBB against the Apple Store, No. 21630686, April 27, 2024

APPENDIX P – Better Business Bureau (BBB).....Pet. App. 1- 4

Petitioner files an on-line compliant with the BBB against Ranchero Vibes on-line store, No. 21551592, April 20, 2024