

Supreme Court, U.S.
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Docket No: 24-263

In The
Supreme Court of the United States

In Re Main Pro se Joyce Beggs,
Pro se James Beggs, et al.,

Petitioners,

v.

Geico Insurance Agency et al.,

Respondents.

On Petition for Extraordinary Writ to the
United States Court of Appeals for the
Fourth Circuit

PETITION FOR EXTRAORDINARY WRIT

Writ of Mandamus

Main: Pro se Joyce Beggs
Petitioners James Beggs,
312 South Willard Ave
Hampton, Virginia 23663
757 265 7784
jjbaby38s@aol.com

A Congress Authorized Writ of Mandamus

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SUPREME COURT, U.S.

Questions Presented

Whether Third Party insurance Agents and Adjustors from three different Court Systems Conspired against Petitioners under Title 18, U.S.C., Sect 241 and The National Flood Insurance Act by Grossly Misunderstanding Pro'se Joyce Beggs Family History Research on Contraband Slaves Farming History, suffer Conspiracy under U. S. Code 42 1985 for over 28 years.

Do Americans who are different like Petitioners, suffering plots under Title 18, U.S.C., Section 241, & 242; & Civil Rights and Due Process Violations, need protections under the U. S. Supreme Court Extraordinary Writ to protect "We the People", in their Jurisdiction.

Whether Third Parties, Insurance Agents & Court Staff Block Petitioners Full Evidence from Court Judges to destroy the Due Process Rights of a Military Family; violating the Civil Rights Act, the National Defense Authorization Act of intelligence Matters by conspiracy under U. S. Code 42 1983 for 29 years voiding their Civil Liberties. under **43 ALL-HAZARD AUTHORITIES** of the Federal Emergency Management Agency Section 1333 [42 U.S.C. § 4053]

Parties to the Preceding

Petitioners:

The Main Pro' se Joyce Patterson Beggs, Pro'se
James Beggs, "Said Child": Lauryn Beggs, "Said
Veteran" Cornelius Beggs

Respondents:

2016-2024

Geico Insurance Agency, Lindsey Inc., Cunningham
Lindsey U. S. Inc., and American Banker Insurance
Company of Florida a/b/a Assurant, et al Case No.
21-174 from the Fourth Circuit record from no: 4:17-
cv-00110-AWA-DEM,

2016-2023

**If Granted under Petitioners Extraordinary
Writ**

Respondents: Third Party Attorney Cynthia King &
Attorney Paulette D. Franklin-Jenkins et al from
Virginia Beach Juvenile and Domestic Court Case
No: CJ17-63, Virginia Beach Circuit Court Case No:
CCR17001285-00, to Virginia Supreme Court 19-
1095 under U.S.C.28 § 2254 - State custody;
remedies in Federal Courts.

1995-2006

**If Granted under Petitioners Extraordinary
Writ**

Respondents: Allied Brokers Inc., John Pane of Panco Serves Inc. Construction Company, Home Paramount Pest Control Company, State Farm Insurance. From Hampton Circuit Court Civil Judgment Records, CL 97-36817-000 7/28/1997, Cl 97-9338-01 07/28/1997, CL 01-000305-00, Cl 97-37341

Related Proceedings

Geico Insurance Agency etc. al, Respondents Last Case No. 21-174 from Virginia Court of Appeals from the Fourth Circuit Respondents: Newport News Federal Court. 4:17-cv-00110-AWA-DEM. Virginia Supreme Court Record 19-1095, Virginia Supreme Court Case 181525, Virginia Supreme Court case 052475, Virginia Supreme Court case 181048, Court of Appeals of Virginia Case No 1224-17-1, Virginia Beach Juvenile and Domestic Court Case No: CJ17-63, Virginia Beach Circuit Court Case No: CCR17001285-00., Virginia Beach Circuit Court Case Cl 16-4672, U. S. Supreme Court Civil Case No: 02-6207 09/06/2002, U.S. Supreme Court Civil Case No: 02-5307 07/18/2002, U.S. Supreme Court Case Civil No: 06-319 01/08/2007, Records from Virginia Beach Court Systems Hampton Circuit Court Civil Judgment CL 97036817-00, 07/28/1997 Records, CL 01-000305-00, Hampton Circuit Court Civil Judgment Cl 979338-01 07/28/1997

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Petitioner's Jurisdictional Statement

The U. S. Supreme Court has Full Jurisdiction under § 28 U. S. C. § 1651 (a), to authorize Petitioners Extraordinary Writ to be an aid to Petitioner's Jurisdiction to stop all Human Rights Violations against a Military Family. Restoring Petitioners Civil Liberties & Civil Rights. Ending all U. S. Constitutional Rights Violations, they suffered for 29 years by misunderstanding Pro'se Joyce Beggs Research on Domestic Violence and the Contraband Slave Camp and City in front of Fort Monroe during the Civil War since November 1995 and Hated by Pictures of the Senators of Mixed Backgrounds on her Walls Taken Down to Protec Petitioners family. Willfully Violating the America Civil Rights Act of 1964; Under the Color of Law; by Third Parties Insurance Agencies, Powerful Third Parties and Powerful Respondents. Having the Power to destroying Due Process to cause server Financial Suffering as a tool to Destroy the Petitioners; Under 28, U. S. C. 1254(1), 28 U.S. Code § 1257, and along with Section 5(a) of the Federal Trade Commission Act. (FTC Act) (15 USC Code 45) prohibits "unfair or deceptive acts or practices in or affecting. Giving this Court Jurisdiction under U. S. CODE TITLE 42--The Public Health and Welfare Charter 50—National Flood Insurance; Subchapter II- Organization and Administration of Flood Insurance Program under § 4053. Adjustment and payment of claims; judicial review; limitations; jurisdiction 15 USC 657, Coordination of Disaster Assistance Programs with FEMA.

Giving this Court direct contact with FEMA; meeting the requirements allowing after 1 year of Petitioners Flooding June 23, 2023, to Settle years of "Said Disallowances Claims", to assume a reasonable proportion of responsibility for the adjustment and payment of claims for losses under the flood insurance program. suffering bad-faith conspiracy actions.

Wherein the matter in controversy exceeds \$230,000.00 Petitioners' true Extraordinary Flood Recovery Badfaith Claims from August 27, 2011, to June 20, 2023. With Complex Cases From The Hampton Circuit Court Respondent State Farm Insurance Company Local Agent Mr. James Fullen, Mr. Richard Randazzo & Tom Reynolds Claim No: 34-49636 From 1995-2007 \$165,000.00. Along with \$60,000.00 from the GOFUNDME to Financially Take Care of "Said Child" from Virginia Beach Complex Cases Cited by Respondents Cynthia King. Said Judge did not learn the Petitioners were already Granted Guardian of Said Child by Said Veteran; being Financially Punished by Judge in Virginia Beach Case Circuit Court Case NO; CL 16-4672 Unable to Travel and Conduct Pro 'se Research with Native American.

Therefore, Having Jurisdiction to Return a total of \$455,000.00 Petitioners had Paid from their Savings for 29 years. N this Court to Stop the Financial Terror from a Misunderstanding of Pro'se Joyce Beggs Research.

With Petitioners Moving this Court to Give Punitive Damages of \$500,000.00 – 1 Million Dollars to Newport News Domestic Violence Programs and Transition Programs as the Insurance Industry Violated the Petitioners' Civil Rights under the Color of Race; as they Helped the Pro'se Joyce Beggs and her Late Mayor of Hampton Mr. Eason.

Petitioners are Unable to Appeal to the Virginia Highest Court in under the "Virginia Court of Appeals" as Petitioners did with Virginia Court of Appeal Case No:1224--1.

Hoping Hon Judge Richard Atlee will work with the U. S. Supreme Court in Addressing Petitioners' Jurisdiction Problems and remember "Said Veteran" as a Little Boy in Complex Cases in 1996 with the Hampton Circuit Court 97-36817 with Federal Protection by U. S. Supreme Court Protecting him under the Virginia Code 8.01-680 when Judgment of Trial Court not to be set aside unless plainly wrong, etc. As his client John Pane of Panco Service Inc. and Home Paramount Pest Control Company; never passed Virginia Code Violations to the Petitioners' home that hurt "Said Veteran", a Child. "Said Judge Needs Federal Protection to Stop Civil Rights Violations under the Color of Law for all people to have Rights Guaranteed under the U. S. Constitution as he Motion for Leaves of Cases while working with Petitioners First Attorney of Record. Said Judge could Explain to Petitioners' Jurisdiction with this Supreme Court "Pro'se Joyce Beggs's grounds for working on the Domestic Violence Bill supporting Senator Biden's Bill in Congress and

helping the Research of Duke University Students, to stop all misunderstanding of her Research in the Phoebus section of her Neighborhood on the Contraband Slaves Family Members and his Family deep History as well. To Save our Historical Town of Hampton and Fort Monroe's true History. Protecting Family members of the Contraband Slaves who wants to Research their Relatives without being secretly Destroyed. As Pro'se Joyce Beggs just wants to be free to Farm like her "Grand Grandfather who happily farmed these Historical Land with Sheppard Mallory and maybe be welcome at Fort Monroe without Physical Harassment. As they are a Loving Family, still Loving all people, and Continuing as "Tomatoville as Misjustice" Trying to save her farm Angel Field Heirloom Tomatoes with Farmers all over the World, Lovingly Representing Virginia as they painfully Fight for Justice.

Therefore, given this Court Jurisdiction under 15 U.S. Code § 1267-(a) As some Third Respondent Cynthia King et al misusing new staff of Petitioners Jurisdiction Virginia Beach Court System to mark Pro'se Joyce Beggs Motions as Late to Block Judges from seeking Petitioners Evidence as "Bulling Conspiracy in Bad Faith" Starting in 2016 continuing from 1996. Having Jurisdictional exceptional powers to bring Federal Constitutional Relief and Financial Relief to all Petitioners and Protecting other Middle-Income Families Civil Liberties under U. S. Civil Law Systems & Court Systems under the All-Writ Act; to end Secret Conspiracy under 42 U.S. Code § 1983 & 1985. Voiding Petitioners' family's "Civil Liberties" with hateful actions using Courts System of their

Jurisdiction as a weapon against people who are different like Petitioners.

Whereas Denying Petitioners Financial Settlement by Third Parties started with Agents Mr. Fuller of State Farm Insurance Company allegedly, with other Respondents. Using Blackballing Conspiracy by Third Parties for over 28 years, under a gross misunderstanding of the Main Pro'se Petitioner Joyce Beggs research on her family Contraband Slaves History Research to obtain her "Farming Goals" made with the "American Women's Underground Network for Battered Women" while working to help Pass this Legislation in Congress with the help of Senator Joe Biden, Senator Jesse Helms, signed into Law by President Bill Clinton.

Blocked from Appealing to the Virginia Court of Appeals, While Protecting Judge Richard Atlee from the United States Court of Appeals connections with Cases 97-36817 from the Hampton Circuit Court in 1997 at the beginning of Petitioners' Civil Rights and Due Process Violation.

Wherefore, taken certain actions under the All-Writ Act under Certiorari, Habeas Corpus, Mandamus, Prohibition to Education Virginia Court Systems that the Violence Against Women Act of 1993 includes Men too, who have been hurt by Females Research of Duke University. Needing all Evidence before Judges of this U S Supreme Court to Open the Doors of the FEMA involving Petitioners Flooding after one year of their last Flooding Events Starting Junes 23, 2024 to start negotiations to Void and Block

Respondents Civil Rights Conspiracy of Petitioners and the Virginia Court System by Third Parties and their Insurance Agency. Geico Insurance Agency

Opinions Below

Geico Insurance Agency etc. al, Respondents Last Case No. 21-174 from Virginia Court of Appeals from the Fourth Circuit Respondents: Newport News Federal Court. 4;17-cv-00110-AWA-DEM.

Virginia Supreme Court Record 19-1095, Virginia Supreme Court Case 181525, Virginia Supreme Court case 052475, Virginia Supreme Court case 181048, Court of Appeals of Virginia Case No 1224-17-1, Virginia Beach Juvenile and Domestic Court Case No: CJ17-63, Virginia Beach Circuit Court Case No: CCR17001285-00., Virginia Beach Circuit Court Case Cl 16-4672, U. S. Supreme Court Civil Case No: 02-6207 09/06/2002, U.S. Supreme Court Civil Case No: 02-5307 07/18/2002, U.S. Supreme Court Case Civil No: 06-319 01/08/2007, Records from Virginia Beach Court Systems

Hampton Circuit Court Civil Judgment CL 97036817-00, 07/28/1997 Records, CL 01-000305-00, Hampton Circuit Court Civil Judgment Cl 979338-01 07/28/1997

Constitutional and Statutory Provisions Involved

Rule of Appellate Procedure; rule 2(a)(5)(c),
U. S. C. 42 Section 1983
U. S. C. 42 Section 1985 (3)
38.2-510. Unfair claim settlement practices.
American With Disability Act. Pro'se Joyce Beggs
Dyslexia
Fifth Amendment
Fourteen Amendment
28 U.S.C. Section 1651,
U S Congress Codifier Honorable Mr. Tomas Durant
Original Historical Interpretation of Title18 Section
242 after the Civil War
U.S.C. Title 18 Section 242
U. S. C. Title 18 Section 241
U. S. C. Title 18 Section 254
Presidential Executive Proclamation Order 13625
The All-Writs ACT codified under Title 28
Equal Justice for Women in the Courts Act
Article III section 2 of the United States Constitution
Americans with Disability Act: for Petitioner Joyce
Beggs Dyslexia.
Civil Right Act
Executive Order of President Obama 13625 2012
Federal Rule of Evidence Rule 60. (1)(2)(3)(d)1.3.
Mental Health Care for Veterans.
Senator John McCain Veterans Community Care and
Access Act.
Senator Mark Warner, Veteran Caregiver Act of
Congress & President Bush Patriot Act
United States Constitution-Fifth Amendment, Sixth
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Eighth Amendment, Ninth Amendment,
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Uniform Transfers to Minors Act
Uniform Gifts to Minors Act
U. S. C. 10 1044b Military Powers of Attorney.
U.S.C. 18 § 241. Conspiracy & Section 242
USC 18 371 U. S. C. 2101 (E), U.S.C. 28 §
2254(b)(1)(B)
U.S.C.28 § 2254 - State custody; remedies in Federal
Courts,
U.S.C. 42 1983
U.S.C. 42 1984 Federal Conspiracy
USSC Record N0: 06-931 In Re Patterson-Beggs
USSC Record No.02-5307 In Re Patterson-Beggs
Violence Against Women Act of 1993

Statement of the Case

Comes Now the Main Petitioner Pro'se Joyce Beggs and Pro'se Petitioner James Beggs et al. Needing an Extraordinary Writ under New Evidence share with the Fourth Circuit Court Citing Bulloch v. the United States, 763 F.2d 1115, 8th to whole Third Parties and Third Parties Insurance Agencies Responsible for violating the Eight Amendment, and U. S. C. 42 Section 1985 (3) as they had the power to interfere with Petitioners' First Attorneys of Records and Destroy American Court Systems in Petitioners' Jurisdiction for 29 years. As showed by Last Respondent Geico Insurance Agency; Great Disrespect while in the Jurisdiction of the Fourth Circuit Court; Willfully Discriminating against the Petitioners causing continued Financial Suffering from Strange Flooding June 23, 2023. With no Fear of

Violating Federal Laws Congress laid out for FEMA Or Petitioners Constitutional Protections since August 27, 2011. Willfully Denying Recoverable Flood Damages as Petitioners were denied fair settlement August 27, 2011, October 28, 2012, October 4, 2015, February 8, 2016, September 9, 2018 and June 23, 2023 needing this Extraordinary Writ to explain Civil Rights Violations. By Thirty Parties Misusing America Large Insurance Industry to destroy Local people and Citizens they Hate. Showing continuation of retaliation.

Conspiracy by Bad Faith Calculations.

Contiguously suffering from Financially Plots to Destroy Petitioners and their Historical Farm and Home by Respondent Geico Insurance Agency and other Insurance Pools under the FEMA Programs, NFIP, SFIP during Case No. 21-174. Writing a letter to Federal Senator Tim Cain in Congress, to investigate Strange Early Flooding: Trying to get financial help to stop said Civil Terrorism that grew out of Cases filed in the Hampton Circuit Court in 1996 of the following: Hampton Circuit Court Civil Judgment CL 97-36817-01, CL 97-36817-00, Cl 97-9338-01 Record, Cl 97-37341, Cl 01-000305-00 that Blackball and Voided the Individual Rights of personal liberty guaranteed by the Bill of Rights and by the 13th, and 14th, with NO Financial Settlement that Voided a timely appeal process in the Virginia Supreme Court because of Covid -19. Around the same time, having their Flood Case cited by the Fourth Circuit Court because the Petitioners refused to sign Incorrect Fraudulent Statement & Fraudulent

Settlement from Respondents, as said Court did not understand the Petitioners' Evidence. Hamer v. Neighborhood Housing Services of Chicago, 138 S. Ct. 13 (2017). The Same type of Thirty Parties Insurance Conspiracy started with the Hampton Circuit Court as some Respondents worked together with Third Parties to change Petitioner's Mayorship and Court Staff as Petitioners paid their First Attorneys of Record in the Hampton Circuit Court. While they paid rent and mortgage payments and healing "Said Veteran" broken bones as a Child. Destroying Petitioners' Mayors to hide Code Violations from the State of Virginia; Respondents were never Prosecuted. Just from a misunderstanding of Pro'se Joyce Beggs Research. Needing the Same help from this Court decision in Marbury v. Madison in 1801, as the Late Chief Justice John Marshall established the principle of judicial review, an important addition to the system of "checks and balances" created to prevent any one branch of the Federal Government from becoming too powerful. Petitioners Jurisdiction need the Same Checks and Balances from to save our Civil Law Systems. Large Insurance Companies want to Pay Attorneys overwhelming our Legal Systems; forcing Middle-Income Families like Petitioners to pay out of Pocket for their Damages and Attorney's fees. As Respondent's Attorney having the Ability to tie up Civil Cases, causing Severe Financial Suffering to Petitioners is discrimination against, Military Families, Middle-Income families, and Poor Black Families. Needing The U S Supreme Court to Protect Petitioners and Large Insurance Companies, against Agents and Third Parties

Needing The U. S. Supreme Court to add all Petitioners Complex Cases together, suffering willful plots of all Respondents to this Special Extraordinary Writ. Safeguarding our State and Federal Civil Law System to allow Judges to see all pieces of evidence as Federal Judge Arenda L. Wright Allen; but did not understand the Petitioner Joyce Beggs Pleading as she suffered from dyslexia.

Whereas the U. S. Supreme Court can address the Petitioners' Jurisdiction of Serious Civil Rights Violations and Serious Violations under FEMA and of the SFIP Programs to waive the express written consent of the Federal Insurance Administrator." 44 C.F.R. pl 61, App. A(l), Art. VII (D) to bring Justice to all the Petitioners' Flooding Events. As True-Face Receipts" and Written reports were given to all Respondents not understood by Federal Judges in said Complex Cases needing the full 29-year history of pure Violation under the Civil Rights Act to see Petitioners painful history voiding their Constitutional Rights by Conspiracy of their Jurisdictional Civil Court Systems the Petitioners needing an Extraordinary Writ to Address. Especially with all the years Petitioners gave Respondent Geico Insurance Agency Pure Receipts of their Damages along with Paperwork requested from Petitioners, "Was their Flood Reporting" not added to the Petitioners' Proof of Losses as Cruel and Unusual Punishment because she suffers from Dyslexia.

Wherefore, Given U. S. Supreme Court Jurisdiction with direct contact with SFIP & FEMA

Federal Programs under a preemption clause, "after one year of Petitioners' of Last Flooding Event from June 23, 2023 - June 23, 2024". While in the Jurisdiction of this Extraordinary Writ to Bring Financial Relief to Petitioners to Stop Third Parties' Federal Abuses by Respondent Geico Insurance Agency et al for the last 10 years, that Created, **Unusual Timing** for Petitioners to file a Regular Writ of Certiorari while forced to Physically Help Recovery from Strange Flooding to save their Historical Home; working with Contractors to lower the Price to 64,000.00 in 2023. 8.01-680 when Judgment of Trial Court not to be set aside unless plainly wrong.

Extraordinary Conflicted of Interest with the Virginia Court of Appeals

Petitioners need to file this Extraordinary Writ; under an **Unusually Important** of their legal principle in voiding any Appeals to the Virginia Court of Appeals in Protecting the Honorable Judge Richard Atlee of the Virginia Court of Appeal. "See Appendix 5" Who was a part of Petitioners' First Cases 97-36817 from the Hampton Circuit Court in 1996. Who worked with Petitioner's First Attorney of Record Mr. James M. Gallagher; while they paid Rent and Mortgage Payments as Petitioners suffered Civil Rights Violations by Third Party Insurance Agencies from Large Insurance Companies for over 29 years. Said, Judge Atlee would be secretly destroyed if he ruled to bring Fairness, or any Justice to Petitioners and children. As Petitioners Closely watching in the Daily Press New Papers "Public Forum" her Mayor and City

of Hampton, Court Systems under the Hon. Judge Ford Destroy. Who all believed in the United States Court of Appeal Mission: 1. To avoid the expense and delay of having a trial, judges encourage the litigants to try to reach an agreement to resolve their dispute. The courts encourage the use of mediation, arbitration, and other forms of alternative dispute resolution, designed to produce a resolution of a dispute without the need for trial or other court proceedings. The Hon. Judge Richard Atlee may have known or seen "Said Veteran" Medical Records of his Broken Bones as a Child of these complex cases that violated the Petitioners Federal Rights under the America Civil Rights Act of 1964. With some Respondents Blackballing the Petitioners with Insurance Companies front 97-that is ongoing; they call "Civil Terrorism" from the Pro'se Joyce Beggs Research, Voiding their Civil Liberties.

Therefore, Given the U. S. Supreme Court, exclusive Jurisdiction over All Respondents from the Fourth Circuit Court and all third-party Insurance Agency 29 to end these Bad Faith actions that purely Violate the Civil Rights Act, against the Petitioners to save their Historical Home Built by the Hands of an Ex Slaves Called James Kirkpatrick on Sheppard Mallory Farmland in the last 1865-1870 on the Historical Farmland of Sheppard Mallory after the Civil War. Documented in the Records of the United States By Hon Henry Phoebus 1900.

Therefore, Appealing Court Case 21-1748 Rehearing En Banc" from Virginia Fourth Circuit Court of Appeal under 28 U.S.C. § 1253. and 28 U.S.C.

§§ 1254, 1257, and 2101(c) used by all Respondents in all Petitioners Complex cases under USC 1895 by Respondents and their Third Parties for over 28 years to void all Petitioners and "Said Child" and "Said Veteran"; "their son Cornelius Beggs": U. S. Constitutional Rights, and Civil Liberties. Even the Fifth Amendment protects against Due Process Violations. Which continued June 28, 2023, being denied Judgment from the Fourth Circuit after waiting 2 years for Justice during the COVID-19 pandemic affecting American societies, Businesses, and Court Systems. At the same time, Petitioners suffered a strange mysterious Flooding of their Historical Home and Farm on June 23, 2028.

Receiving Notice from the Fourth Circuit Court and Flood Waters simultaneously with Major Construction in their neighborhood. Blocking Petitioners from filing a Timely Notice of Appeal, saving their home and farm, and being forced to pay again for their own Flood Damages, under Petitioners New Flood Insurance Company. Mysteriously using same third-party Respondents Geico Insurance Agency who continued plots of Due Process Violation & Civil Rights violations toward Petitioner for fair settlement voiding Petitioner's Federal Constitutional Rights adding cruel and Unusual Treatment, just to continue their suffering from unfair settlement practices under a Federal Program under FEMA, because they are different. While dominating Petitioner's Jurisdictions with a New Flood Insurance Company. As Petitioners Suffer more Damages over 64,966.58 while doing some of the Manuel Flood clean-up themselves to save money

while investigating Strange Flooding with Neighborhood Development Construction Company.

Therefore, moving this Court to add Petitioners' Last Flooding on June 23, 2023.

Moving this Court to Add Punitive Damages to the Battered Woman Organizational Programs in Newport, News Virginia. Will act as some needed Relief of Justice to the Petitioners as Respondents Realized their Federal Violations against the Petitioners were based on false information and true Misunderstanding that took away their Civil Rights and Due Process. As the Petitioners have the heart to forgive. Only wanting compensation for their True Damages suffered.

Therefore, only this U. S. Supreme Court can restore The Petitioner's Rights. Ending all Actions of Civil Terrorism, giving all Petitioners back their Federal Constitution Rights suffering from Misunderstandings. Under Article III section 2 of the United States Constitution

Petitioners Moves U. S. Supreme Court to Add all Complex Cases of "Said Third Parties and Third Parties Insurance Agents".

Wherein the matter in controversy exceeds \$162,358.62 of damages from Hampton Circuit Court Cases 1996 from 97036817-00 State Farm Insurance & Home Paramount Pest Control Insurance Company: Giving Punitive Damages to Newport News Domestic Violence Programs.

Petitioners Moves U. S. Supreme Court to Add Said Complex Cases from Virginia Beach; Having Jurisdiction over "Said Third Parties". Wherein the Matter is Controversial \$60,000.00 From a GoFundMe by Third Parties in Virginia Beach to cover Petitioners; Traveling Expenses & Child Related Expenses Since 2016 as Petitioners were Void of any Financial Help from Said GoFundMe of "said child". Giving this Court Jurisdiction to Unite "Said Child" with her father "Said Veteran" as a family Unite; under; 28 U.S. Code § 2253 – Appeal, 28 U.S. Code § 2253 – Appeal, 28 U.S. Code § 2255 - Federal custody; remedies on Motion attacking sentence or 28 U.S. Code 2254 State Custody; Remedies in Federal Court. Suffering many Flooding Events in 2016 at the same time Respondents in Virginia Beach blocked Pure Evidence under the Violence Against Women Act of 1993 on behalf of, "Said Veteran". As Third Parties from Virginia Beach Blocked all Judges from seeing Petitioners Evidence of Late Lysa Story from Virginia Beach showing pure Evidence of their son "Said Veteran" Head Cut Off while on Assignment at a Military Base in the State of Hawaii as they tried to get Home to understand said Violence Pictures because of her Background. As Petitioners worked on their Flooding Events saving their Home. Third Parties work on making money from a GOFUNDME that were not needed from the Public; as Petitioner were given said Child to Protect: needing to be fined as Virginia Beach Police Officers saw Petitioners Evidence and their Security Cameras and left "Said Child" with Petitioners July 20, 2016. As said Flooding in 2023 took away Petitioners saving.

Ending Pro Joyce Beggs and "Said Child" Ballet classes in the Beautiful City of Newport News for Petitioner Joyce Beggs and her infants, Lauryn Beggs, receiving no funding from Virginia Beach Court Record no: to care for said child.

Whereof considering New Evidence that Respondent Cunningham Lindsey, U. S. INC., created a Conflict of Interest by using the Petitioner's Church, who is almost the only Black Americans attending the Phoebus Methodist Church, that sits on the grounds her Great Grandfather Received his Freedom. While the Church Johnson Family continues to give Petitioners Family Love and Support to continue attending Church on the Grounds walked on by her Great Grandfather and Other Contraband Slaves. Happily attending said Church in the Footsteps of her Great Grandfather who prayed on this Historical Church Property. As Said Churchland was given to the Contraband Slaves during the Civil War by Major Benjamin Robert Butler; to feed and take care of Wounded and Sick Union Soldier at the Mouth of Fort Monroe as their Praying Grounds. Built with the wood from the ruin of the Former, Chesapeake City burndown to keep from the Union.

Therefore, all Descendants Like the Petitioners Need Constitutional Protection from the U. S. Supreme Court to safely research their families' members of Contraband Slaves under the Thirteen Amendment. Showing Respondents allegedly conspired with other Respondents from Virginia Beach in United States Supreme Court No. 19-1095 that continued many Conflicts of Interest in

Petitioners Small Phoebus Town Communities. While plotting to destroy the Petitioners' Home, which is protected under the Fifth Amendment of the United States Constitution. U.S.C.28 § 2254 - State custody; remedies in Federal Courts. along with the Eighth Amendment, Ninth Amendment, Fourteen Amendments

Showing all Respondents Grossly misunderstood the Petitioners. Especially the Main Pro'se Petitioner Joyce Beggs Studying with the Students at William and Mary Law School, were like the studies with Students at Duke University. Working hard to understand their Research on protecting the 10% Percentage of Men to be placed in Senator Biden's Bill before Congress. Meeting the Late Senator Jesse Helms Staff and Supporters who were also a part of the Underground Battered Women Network; working on Senator Biden's Bill as a part of the Battered Women Underground Network to Pass our Bill in Congress, signed into Law by President Bill Clinton.

Federal Prosecution for Violations of Certain Laws Under 42 U.S. Code § 1987

The continuous conspiracy by Some Respondents and their Third Parties shows severe federal violations under the "Equal Justice for Women in the Courts Act. Destroying Due Process and violating FEMA Programs; needing the All-Writ Act to be an Aid for Petitioners' Jurisdiction; as Respondents did not have the power to Block Fair Settlement to Petitioners Historical Property to

deprive them of funds to recover under U. S. Code 42 1985, of conspiracy to destroy the Last Home built by Ex-Slaves in the Phoebus section of Hampton, Virginia from the Contraband Slaves Communities after the Civil War. Properly recorded on the Records by the Late Mr. Phoebus New Township from 1900. Rebuilt by the son of an -Ex-Slave and family members, by Mr. James Kirkpatrick Jr. 1958.

Background of Civil Right Violation in 1997

The City of Hampton Code Compliance Department educated the Pro'se Petitioner Joyce Beggs to learn basic constructional skills for her Historical Home with Classes to becoming certified, suffering from Dyslexia after losing their cases. Shows forth Respondents in these cases could have approached Petitioners' City of Hampton Code Compliance Department to safeguard her children's safety by pulling a Permits as required by Law in 1995, and Their Historical City of Hampton City Code Officer would have helped them accomplish their Goals on Passing Inspection before Petitioners children were hurt in their New Home. Said City of Hampton Laws are there to help protect society. Knowing Children were moving in, and made to survive willfully Plots of Conspiracy, pure discrimination under 42 U S C 1985. Voided their Constitutional Rights for over 29 years. Showing said Respondents' Actions Misunderstood the Petitioners' Hearts and took away their Due Process under Federal Civil Laws by the Virginia General Assembly and the U. S. Congress.

As Respondents from the Hampton Circuit Court would have received the same Support as the Main Pro 'se Joyce Beggs in learning Construction Skills needed to pass inspection with needed repairs of the Petitioners House with the City of Hampton they paid for at the Closing. Petitioners Appendixes needs to be studied closely by Federal Judges. Showing s Respondents allegedly, willfully interfered with their first Attorneys of Records and used conspiracy by Third Parties in Petitioners Historical Jurisdictions under 42 U.S. Code § 1985 voiding Petitioner's Human Rights and Federal Constitutional Rights continuing for over 28 years involved in these Complex Cases by replacing their Hampton Mayor and Court System Leadership just to destroy the Petitioners from a misunderstanding of Pro'se Joyce Beggs;

- a. Research in helping to Pass Senator Biden's Domestic Violence Act of 1994 into law" with the help of the Late Senator Jesse Helms working together to Protect the 10% of Battered Men" under that Bill from Duke University Research.
- b. learned research that the Honorable General Benjamin Butler, who gave her Great Grandfather his freedom; was also "Destroyed by Secret Conspiracy" after the Civil War. Given this Court Jurisdiction of the First Respondents under 42 U.S. Code § 1985 – "Conspiracy to interfere with Petitioner Civil Rights" misunderstood the Petitioner's Research because they were different which has continued for over 29 years.

It's clear to the Petitioners as Pro'se that "Third Parties Respondents" in Civil Litigation feel they can conspire to continually deprive Middle-Income American Families, and Low-Income individuals or Black Families of America. Easily destroying families because they cannot afford Attorneys for Complex litigation under Civil Laws. Making said Respondents feel they can use conspiracy easily to disrespect Americans' Civil Rights and State Rights, and Void Federal Constitutional Right's; using plots to Terrorizing anyone supporting the Petitioners, under 42 U. S. Code 1985. As Petitioners and American needs Community Love without hate because they are different. Third Parties plotting by Respondents and Insurance Adjustors under a Federal Program in Petitioners region; can only be Classified by the Petitioners a Civil Terrorism. As Said Civil Terrorism under a Federal Program under FEMA needs to be investigated by the U S Supreme Court; as Respondent Geico Insurance Company used another Third Party under them; to handle another small portion of Petitioner flooding called From Florida. Especially with the Fourth Circuit Court wanting the Petitioners to Sign their Rights away. Being Forced to sign financially damaging Insurance Settlements in June 2023 as Ruled by 3 Judge panel from the Fourth Circuit Court as their true Damages were 177,000.00 in 2016 throw 2018 could not sign a very low Settlement Statement with their only Option was to pray. But force to sign Respondent Geico from June 2023 flooding with no Legal Protections against Third Parties Conspiracy with Petitioners Flooding cost of 64,966.58 in 2023. Hurting the Petitioners financially;

ending Petitioner Joyce Beggs and her Grandkids Ballet Lessons in Newport News in 2023. With Great Losses to their Farming Income. Hurting their savings accounts, paying Company Servpro \$17,628.31, and paying for plumbing repairs. Paying to rebuild their Heating Duct Systems under their Home for \$10,823.12 and Foundation Repairs for JES of 36,515.15. Forcing Petitioners to help repair Flood Damages to save money, while caring for their Grandchild with no financial income from Virginia Beach Complex Cases from 2016 in Supreme Court Case No: 19-1095; shows said conspiracy will continue to take away Petitioners' Due Process. Forcing Petitioners to do the work from JES themselves. Only Received \$3,482.90 from Respondent Geico Insurance Agency byway of Conspiracy again in 2023, while being deprived of filing Petitioners Notice of Appeal on Time. A situation worse than the Cases Petitioners cited in their Last Notice of Appeal to the Fourth Circuit Court while fighting said Third Party Respondents in 2016. Needing Respondent Geico Insurance Agency to cover all Petitioners damages Flooding again in 2023. Writing Virginia U.S. Senator Tim Kaine Senator to investigate Strang Flooding before Petitioners Hurricane Season starts affecting their Home and Farm "after their farming season". Just continued "said civil terrorism of voiding petitioners' federal constitutional rights, as their Flood Damages suffering were 64,966.58. As Petitioners Changed their Flood Insurance Company in 2022, receiving the Same Third Party Respondent Geico Insurance. As the Three Judge Panel from the Fourth Circuit Court agreed with Judge Arenda L. Wright Allen's Ruling from the U. S. District Court of

Eastern District of Newport News as the Petitioners explained that third-party adjustors defrauded them by falsely lowering their home value to defraud them of any changes of a Fair Settlement that continues on going breach of contract, negligence, due process violations, pure discrimination, that Started with as new staff of the Hampton Circuit Court with Respondents and their Third Parties Insurance Adjustors; cases 97-3741, 97-36817. With Petitioner's Evidence showing Campaign Contributions to Petitioner's witnesses for trial to Del Tom Gear; as his Sister Kathy Gear Owens was a Substitute Judge with the Hampton Circuit Court and Attorney for Respondent John Pane Attorney of Record. Showing Third-Party Respondents allegedly have the Power and Friends in our Court System to allegedly; use "Jurisdictional Conspiracy for over 28 years" by misusing FEMA, NIFA, and Large Insurance Companies without the help of the United States Supreme Court in these Complex Cases. With the power to "Block True Evidence" from our American Judges by secret contacts in our Court System to cause unnecessary financial suffering to destroy American Lives by Voiding out Black Ball citizens' Federal and State Constitutional Rights. Destroying anyone different like the Petitioners, who are good citizens of the United States because of a misunderstanding, who are not welcome at Fort Monroe's ongoing Activities, with their farming Business of Angel Field Heirloom Tomatoes. Being destroyed by her online search engines to block customers from Petitioner Business's Site on the web. As Joyce Beggs's research shows forth; Third Parties are responsible under Civil Law if they Use

Conspiracy under 42 U.S. Code § 1985 against people who are different.

All Respondents and their Third Parties allegedly used Conspiracy to Void Laws from the U. S. Constitution, the State of Virginia Constitution, and the Hampton Code Compliance Department. Willfully Blocking Petitioners from Federal Programs under FEMA because Petitioners' is a Hated Mix-Race Couple. With no end in Respondent plotting Systems to Stop destroying the Petitioners and their Historical Home. As Pro'se Joyce Beggs continues researching their family Contraband Slave History in the Phoebus section of Hampton in a friendly Loving Way. Positively Representing her state of Virginia, Her City of Hampton, and Fort Monroe with their Farming Business on Tomatoville.com. Receiving help from Native Americans and the Late Dr. Carolyn Male of Historical Vegetables and Heirloom Tomatoes grown here by Contraband Slaves as they build the First Black City in America. Given this Court, the need information to let America learn of the Great Late Senator Jesse Helms and his Staff with their Churches as large parts of the Underground Battered Network like Newport News working before President Clinton Signed our Bill into law. Whereas Petitioner's Appendixes will show forth the facts they suffered from a "Gross Misunderstanding of her Family Mission in the Phoebus Section of Hampton Virginia, with Respondents' willfully intended recklessness disregard to Petitioners' Constitutional Rights, Human Rights, and Civil Rights. Willfully voiding their Civil Liberties to seek Justice. under 42 U.S. Code § 1985 - Conspiracy to interfere with Civil Rights

since 1995 as Pro'se Joyce Beggs continues to Represent her great State of Virginia in her Research at Tomatoville.com with Farmers from all over the World.

Therefore, only this U. S. Supreme Court can End the Petitioner's Financial Suffering and Unify "Said Veteran" and "Said Child" back together From Virginia Beach Circuit Court Case No: CCR17001285-00 Jurisdiction. As "Said Veteran" fought for Our Country after 911 in Afghanistan and suffered in bad faith under Civil Laws Jurisdiction and Criminal Laws as Virginia Beach Judges and the Public were "Blocked from reviewing Petitioners' evidence sent to the Courts. Shows he had to protect his Self & Child on July 20, 2016, under the Violence Against Women Act of 1993 which protects men too. Voiding his Constitutional Rights over all complex cases suffering Hate and Misunderstood from said Respondents and third-party-players in Virginia Beach, who overlooked "The Late Lysa Story Pictures sent to Petitioners with their son "Said Veteran Cornelius Beggs" and "Said Child" Head-Cut-Off. Allegedly Violating section subtitle E: New Evidentiary Rules – that caused the danger of unfair prejudice under President Biden Bill S.11 - Violence Against Women Act of 1993, "As Pure Evidence of Domestic Violence toward a Male Victim as researched by Duke University; supported by the Late Senator Jesse Helms. While Petitioners were Living away from home on assignment at a Military Base in Hawaii, trying to get home to investigate said Treating Pictures. Allegedly showing discrimination and conspiracy against Petitioner's Family because of her family research and great respect for the Late

Senator Jesse Helms as his Picture hung in their home; with new Staff and Circuit Court Judge from a Misunderstanding from Hampton Circuit Court 97-36817-97-37341 as said Respondents Failed Inspection from the City of Hampton Code Department on October 30, 1996, & November 15, 1996

Only this Supreme Court can address the Gross Misunderstanding and Restore all Petitioners' Rights under the U.S. Constitution; showing "The Late Senator Helms ties with Pro' se Joyce Beggs is because she witnessed his ~~Heart~~ protecting mankind as Republicans and Democrats worked on Senator Biden's Domestic Violence Bill; to stop the hatred suffered by the Petitioners.

Appointing Petitioners an Attorney

Moving the U. S. Supreme Court to Appoint Petitioners with an Attorney to Investigate Conspiracy that is used in all of these Complex Cases. Suffering plots to Block Petitioners from filing; Timely Notice of Appeal in the Fourth Circuit Court, with new neighborhood Construction around, said Conspirators. Showing Middle-Income American Families, nor 70% of Black American Families will-not or can-not survive this type of Civil Conspiracy that feels like Civil Terrorism from Insurance Companies and their Third Parties. Especially representing a Federal agency under FEMA to destroy People and Families that are different or Minority. Citing Bulloch v. the United States, 763 F.2d 1115. Needing this Court Appoint to an Attorney

to Petitioners To help Handle this Extra Ordinary Writ and investigate Petitioners' Strange Flooding suffered June 23, 2024. That were allegedly used to Block Petitioners of a Fair Appeal Process and Continue any Fair Settlements Used by Third Parties for 29 years with the Power to interfere with Petitioner Pass Attorneys. While Petitioners paid attorney Fees, Rent, and Mortgage suffering ongoing Civil Conspiracy by Powerful People, that voided their Constitutional Rights. As Petitioners clearly stated in Extraordinary Writ their Research shows "Said Respondents have nothing to Fear of Petitioners Research on the Big Lost City of Contraband Slaves in front of Fort Monroe". "Learning that Mr. Henry Phoebus was a good man of his word; trusted by the Contraband Slave Community and her Great Grandfather. Employing the First Mr. James Kirkpatrick to help build his town of Phoebus by using his Construction Skills learned from Slavery as he continued to build onto his own Historical Home on this land, he brought from Shepard Mallory for the Price of Muscadine Grapevine; still growing on Petitioners' farming property on Downes Street in the back of Petitioners House. With Petitioner's research showing Native Americans she interviewed; believes segregation caused many of the losses of her great-grandfather's history after the Civil War. Citing *Collins v. Hardyman*, 341 U.S. 651 (1951). Learning that Segregation Laws destroyed the Historical Records of this Town while being transferred to the City of Hampton Virginia in 1958. The Petitioner Joyce Beggs loves her historical City of Hampton and the City of Newport News. Especially, with Petitioners' Town of Hampton Virginia Reported in

2023 that their Battered Women Agency helped their First Male Client. It may be possible for the World to learn about the Late Senator Jesse Helm's Actions; helping to add Male Clients using Duke University research under the Biden Bill S.11 - Violence Against Women Act of 1993, along with the help of Petitioner Joyce Beggs and many States helping as stated. Making it possible for Petitioner Joyce Beggs to clear up the gross misunderstanding to end all Conspiracy against her family. Clearing -up all Misunderstandings of why Senator Jesse Helm's picture hangs on her Walls and explaining her Background to be "Understood by her Community and her Jurisdiction" to end Petitioner's Suffering by way of Conspiracy under U. S. C. 42 Section 1985 (3) for over 29 years. Ending all misunderstandings; to protect their Historical Home and Family facing Continued Federal Conspiracy as Respondents and their Third Parties Started in 1995. Completely Disrespected the Petitioners' Late Mayor Eason and his Staff, and employees at the Hampton Circuit Court under Judge Ford, along with their Historical Government of Hampton & Virginia Code Compliance Department. With no concerns about placing Petitioners and children in an unsafe House. No concern about her kids suffering broken bones or falling through Floors "to run them out of town". With no concerns for their Medical Bills. A practice allegedly used by some Professionals to keep the Large City of Contraband Slaves erased from History.

Therefore, Destroying the Community Love Invested in Petitioners and her Children from Newport News Battered Woman Organization as

Petitioner Joyce Beggs worked 2 Jobs to buy a house on Contraband Slave Land as President Clinton signed their Battered Women Bill into law. As Respondent Conspiracy in earlier cases cited "Destroyed and Voided the Federal Due Process by Secret Hate & Conspiracy of anyone pulling up the hidden history of the Contraband Slaves. all Professional Respondents Received Petitioner Joyce Beggs Money to make Constructional Repairs of said Historical Home and Floors, along with other repairs in 1995. Leaving their Home unsafe; that hurt Petitioners Children. With "no" calls to the Hampton Code Compliance to start any work nor Constructional Repairs to their Home in 1995 by Respondents. Placing Petitioners family in danger; with no concerns for the safety of her little children. As Petitioners Home was Completely untouched by any construction nor repairs by all Respondents after giving them Financial Funds shown in Supreme Court Case No: 06-931.

Newport New Supporters and Church Leaderships Prayed for Petitioners' Child Cornelius Beggs after falling and breaking his leg in many places; falling through the Floor was the Responsibility of all Respondents in case No: 06-931. Destroying "Said Veteran" Football Career and who was called to Preach as a kid from all the Love and Community Leaders from Newport News, Virginia. Serving our Country in Afghanistan after 911. Denied Due Process under the Executive Order of President Obama 13625 2012. As said Virginia Beach Judges were blocked from seeing Petitioner's Evidence of Pictures with his Head-Cut-Off by the late Lysa Story

who attacked him and his child in Virginia Beach on July 20, 2016.

The Protections the Late Senator Jesse Helms gave to Male Victims of Domestic Violence in the United States must be protected by all Court Systems as he did not work of these Commits in Congress, just with Senator Biden and President Bill Clinton. As Respondents from Virginia Beach Circuit Court Case No: CCR17001285-00 in said Complex Cases continue to Block Judges from seeing true Evidence of Domestic Violence suffered by Petitioners' son "Said, Veteran". Said Federal Conspiracy has the Power to Block Judges from seeing Petitioner's Motion to Protect Military Health Records and Medical Records from the VA. and Mental Health Care Facilities for Veterans. "Voiding Senator John McCain Veterans Community Care and Access Act". Violating Senator Mark Warner's "Veteran Caregiver Act of Congress & President Bush Patriot Act. Knowing Said Veteran was forced to save his child's life on July 20, 2016. After suffering as a child from "Hampton Circuit Court Complex Cases.

Showing their motivation was allegedly pure discrimination. "Showing Descendants of Contraband Slaves are not Free under the Thirteen Amendment as Planned by President Lincoln citing Visikides V, Derr. 3 Va App 69 (1986)

Mayor Eason of Hampton

Said Conspiracy used by Respondents had the power to Destroy the Late Great Mayor of Hampton,

give detailed written notice identifying the property damaged, how and when the damage occurred, and the property's value." *Id.* The SFIP states:

J. Requirements in Case of Loss

In case of a flood loss to insured property, you must:

* * *

4. Within 60 days after the loss, send us a proof of loss, which is your statement of the amount you are claiming under the policy signed and sworn to by you, and which furnishes us with the following information:
 - a. The date and time of loss;
 - b. A brief explanation of how the loss happened;
 - c. Your interest (for example, "owner") and the interest, if any, of others in the damaged property;
 - d. Details of any other insurance that may cover the loss;
 - e. Changes in title or occupancy of the covered property during the term of the policy;

- f. Specifications of damaged buildings and detailed repair estimates;
- g. Names of mortgagees or anyone else having a lien, charge, or claim against the insured property;
- h. Details about who occupied any insured building at the time of loss and for what purpose; and
- i. The inventory of damaged personal property described in J.3. above.

5. In completing the proof of loss, you must use your own judgment concerning the amount of loss and justify that amount.

44 C.F.R. pt. 61, App. A(1), Art. VII(J).

The SFIP makes it clear that the responsibility of completing the proof of loss form lies with the insured. *Moffett*, 451 F. Supp. 2d at 574 (citing 44 C.F.R. pt. 61, App. A(1), Art. VII(J)(5), (7), (8)). The SFIP states:

The insurance adjuster whom we hire to investigate your claim may furnish you with a proof of loss form, and she or he may help you complete it. **However, this is a matter of courtesy only, and you must still send us a proof of loss within 60 days after the loss even if**

the adjuster does not furnish the form or help you complete it.

44 C.F.R. pt. 61, App. A(1), Art. VII(J)(7) (emphasis added).

Notably, the SFIP provides that the policy "cannot be changed nor can any of its provisions be waived without the express written consent of the Federal Insurance Administrator." 44 C.F.R. pt. 61, App. A(1), Art. VII(D).

The SFIP also includes a preemption clause, which states: "This policy and all disputes arising from the handling of any claim under the policy are governed exclusively by the flood insurance regulations issued by FEMA, the National Flood Insurance Act of 1968, as amended (42 U.S.C. § 4001, *et seq.*), and Federal common law." 44 C.F.R. pt. 61, App. A(1), Art. IX; *see also* *Woodson*, 855 F.3d at 631.

C. American Bankers' Motion to Dismiss

In its Motion to Dismiss, American Bankers explains that it is a WYO Company that issued a SFIP to Plaintiffs. *See* Mem. Supp. American Bankers' Mot. Dismiss at 4-7, ECF No. 57. American Bankers further explains, as noted above, that:

All SFIPs, including the [Plaintiffs'] SFIP, include the requirement that, in the event of a loss, the insured must submit to the WYO Company a timely,

signed and sworn Proof of Loss stating the total amount being claimed, along with an inventory of damaged property showing the quantity, description, actual cash value, and amount of loss, accompanied by all bills, receipts, and related documents.

Id. at 8 (emphasis in original) (citing 44 C.F.R. pt. 61, App. A(1), Art. VII(J)).¹⁰

American Bankers argues, among other things, that dismissal of this action is warranted because Plaintiffs "readily admit in the Second Amended Complaint that they did not comply with the statutory Proof of Loss requirement of their SFIP," which is a "statutory condition precedent to any lawsuit under the NFIP" that American Bankers cannot waive without the written consent of the Federal Insurance Administrator. *Id.* at 3, 10-14. American Bankers argues:

The [Plaintiffs] make many excuses about why they did not complete any

¹⁰ In its Motion to Dismiss, American Bankers notes that the Federal Insurance Administrator "issued two Proof of Loss extensions" with respect to "claims for flood damage caused by Hurricane Matthew." Mem. Supp. American Bankers' Mot. Dismiss at 9, ECF No. 57 (citing FEMA Bulletin W-16088 (Nov. 22, 2016); FEMA Bulletin W-17001 (Feb. 2, 2017)). As a result of these extensions, Plaintiffs had 180 days, rather than the standard 60 days, to submit a signed and sworn Proof of Loss form. *Id.*

Proof of Loss in the Second Amended Complaint, and none of them succeed as a matter of law. The [Plaintiffs] allege generally that they trusted Defendants to complete one for them. They also admit that they refused to sign the Proof of Loss provided to them because they believed their house was valued too low. None of these "reasons" survive the governing law and precedent requiring them to submit timely Proofs of Loss on their own if they had disagreed with what their WYO provided to them as a matter of "courtesy only."

Id. at 12-13 (citing *Dawkins v. Witt*, 318 F.3d 606, 612 (4th Cir. 2003)).

Although American Bankers recognizes that "the result of the [Plaintiffs'] failure to file a timely Proof of Loss may seem to lead to a harsh result" American Bankers argues that "this Proof of Loss requirement is strictly construed and an insured must fully comply." *Id.* at 14 (citing *Harris v. State Farm Fire & Cas. Co.*, No. 4:05cv5, 2006 WL 73602, at *9 (E.D. Va. Jan. 11, 2006)).

In their response to the pending dismissal motions, Plaintiffs admit that they did not file timely Proof of Loss forms, as required by the SFIP. *See Mot. Quash* at 9-10, 13-18, ECF No. 62. However, Plaintiffs appear to argue that: (i) Defendants intentionally provided Plaintiffs with "courtesy" Proof of Loss forms that contained inaccurate information, and (ii)

Plaintiffs had "no time to make corrections" prior to the expiration of the Proof of Loss submission deadline. *Id.*

As noted, the SFIP specifically provides that although an insurance adjuster "may furnish [an insured] with a proof of loss form," or "help [an insured] complete" a proof of loss form, "this is a matter of courtesy only," and the insured must personally ensure that a proof of loss form is timely submitted. 44 C.F.R. pt. 61, App. A(1), Art VII(J)(7); *see also Gunter v. Farmers Ins. Co.*, 736 F.3d 768, 775 (8th Cir. 2013) (finding that insureds were "not bound by the estimate in the adjuster's report, but rather were obligated to claim the amount of loss they believed they should recover"). Here, Plaintiffs did not timely submit Proof of Loss forms with respect to their flood-related expenses.¹¹ Because Plaintiffs did not

¹¹ The Court notes that Plaintiffs allege that Defendants acted in bad faith when they provided Plaintiffs with "courtesy" Proof of Loss forms that, according to Plaintiffs, undervalued Plaintiffs' damaged property. *See* Second Am. Compl. at 10-11, 26, ECF No. 46. To the extent Plaintiffs intended to argue that, due to this alleged bad faith conduct, Defendants should be equitably estopped from raising the defense of failure to submit timely Proof of Loss forms, the Court finds that such argument fails. To establish the applicability of equitable estoppel under these circumstances, Plaintiffs "must not only satisfy the traditional requirements for equitable estoppel, but also they must show affirmative misconduct" on the part of Defendants. *Dawkins v. Witt*, 318 F.3d 606, 611-12 (4th Cir. 2003). The traditional requirements of equitable estoppel involve a showing that:

(1) the party to be estopped knew the true facts; (2) the party to be

comply with this precondition to recovery, Plaintiffs cannot collect on their policy-based claims.¹²

estopped intended for his conduct to be acted upon or acted in such a way that the party asserting estoppel had a right to believe that it was intended; (3) the party claiming estoppel was ignorant of the true facts; and (4) the misconduct was relied upon to the detriment of the parties seeking estoppel.

Id. at 611 n.6 (citing *McCravy v. FEMA*, 642 F. Supp. 544, 547 (E.D.N.C. 1986); *United States v. 18.16 Acres of Land*, 598 F. Supp. 282, 286 (E.D.N.C. 1984)).

The Court finds that Plaintiffs have not established the applicability of the above elements, or that Defendants engaged in affirmative misconduct. Even assuming that Defendants intentionally undervalued Plaintiffs' property in the courtesy Proof of Loss forms, Plaintiffs "were obligated to exercise their own judgment in completing their proofs of loss, and they were free at all times to reject the adjusters' assistance." *Howell v. State Farm Ins. Co.*, 540 F. Supp. 2d 621, 631-32 (D. Md. Mar. 26, 2008). Under these circumstances, the Court finds that the application of equitable estoppel is unwarranted.

¹² American Bankers also argues that even if Plaintiffs had timely filed Proof of Loss forms, portions of Plaintiffs' request for damages - namely their request for \$10,000.00 for the denial of "emergency assistance" and \$200,000.00 for "elevation costs" - would nevertheless fail. Mem. Supp. American Bankers' Mot. Dismiss at 15-17, ECF No. 57; *see also* Second Am. Compl. at 30-31, ECF No. 46. American Bankers first argues that "[t]he SFIP only covers direct physical loss by or from flood," and does not provide for "emergency assistance." Mem. Supp. American Bankers' Mot. Dismiss at 15-16. Additionally, American Bankers argues that "the SFIP provides limited coverage for elevation" in "strictly limited circumstances." *Id.* at 16. For example, the SFIP requires that an insured seeking elevation coverage show that the

Plaintiffs' Second Amended Complaint contains references to due process violations, discrimination, and 42 U.S.C. § 1983, suggesting an intent to raise constitutional-based claims. *See* Second Am. Compl. at 8-9, 17-20. American Bankers argues that any intended constitutional claims fail to meet the requisite pleading standards. *See* Mem. Supp. American Bankers' Mot. Dismiss at 17-19. American Bankers states: "[Plaintiffs] baldly assert that American Bankers sent a discriminatory adjuster to their home, who undervalued their home because they had pictures of politicians from both major political parties on their wall and they are a mixed-race couple." *Id.* at 17. However, American Bankers argues that: (i) "[t]here are no facts to substantiate [Plaintiffs'] claims;" (ii) "[Plaintiffs'] claims are limited to their discontent with the valuation of their home and their lack of compensation for their alleged losses;" (iii) Plaintiffs' belief regarding the discriminatory intent behind the alleged undervaluation is mere speculation; and (iv) Plaintiffs' speculative and conclusory allegations of discrimination, without factual support, "are insufficient to withstand *Twombly/Iqbal* pleading standards." *Id.* at 17-19.

home is a "repetitive loss structure," and that the community has a "substantial damage provision or repetitive loss provision in its floodplain management law or ordinance being enforced against" the home. *Id.* (emphasis in original) (citing 44 C.F.R. pt. 61, App. A(1), Art. (III)(D)(3)). American Bankers argues that Plaintiffs have not established such circumstances. The Court agrees. The Court finds that Plaintiffs request for "emergency assistance" and "elevation costs" would fail regardless of the Proof of Loss issues addressed above.

Upon review of Plaintiffs' Second Amended Complaint, American Bankers' arguments for dismissal, and Plaintiffs' responses thereto, the Court finds that Plaintiffs: (i) fail to adequately specify the constitutional claims that they seek to assert against Defendants; and (ii) do not allege sufficient facts to state any constitutional claim against Defendants. *See* Second Am. Compl. at 8-9, 17-20.

With respect to Plaintiffs' remaining claims, American Bankers argues:

Lastly, [Plaintiffs] assert a series of additional extra-contractual and/or state law claims, all of which are preempted by federal law and should be dismissed as a matter of law. The SFIP was written by the United States Government, pursuant to 42 U.S.C. § 4013, and may be found in its entirety at 44 C.F.R. Pt. 61, App. A(1). The SFIP contains a choice of law provision that expressly states that SFIP disputes are governed exclusively by federal regulation, the NFIA, [and] Federal common law, and courts have repeatedly held that state law claims are completely preempted.

* * *

Additionally, neither the NFIA nor the SFIP authorize policyholders such as [Plaintiffs] to bring extra-contractual claims against a WYO company, such as

American Bankers. Absent such authorization by the NFIA or the SFIP, extra-contractual claims cannot succeed against a WYO company. Congress has legislated that the remedy for an insured under the NFIP to contest flood loss determinations is limited to a breach of contract cause of action for breach of the SFIP. Since neither the NFIA nor the SFIP authorize policyholders, such as [Plaintiffs], to bring extra-contractual claims, [Plaintiffs'] extra-contractual claims fail as a matter of law and should be dismissed.

Mem. Supp. American Bankers' Mot. Dismiss at 19-20 (citing *Wright v. Allstate Ins. Co.*, 500 F.3d 390, 398 (5th Cir. 2007); 44 C.R.R. pt. 61, App. A(1), Art. VII(R)).

Although Plaintiffs' Second Amended Complaint is difficult to decipher, Plaintiffs' claims are clearly based on Defendants' handling of Plaintiffs' flood damage claims. As noted, the SFIP includes a preemption clause, which expressly states: "This policy and **all disputes arising from the handling of any claim under the policy** are governed exclusively by the flood insurance regulations issued by FEMA, the National Flood Insurance Act of 1968, as amended (42 U.S.C. § 4001, *et seq.*), and Federal common law." 44 C.F.R. pt. 61, App. A(1), Art. IX (emphasis added); *see also Woodson*, 855 F.3d at 631, 637 (stating that "[i]t is not surprising, therefore, that every other circuit to have considered this issue has concluded that

state-law claims against write-your-own insurance providers are preempted by federal law"); *Davis v. Nationwide Mut. Fire Ins. Co.*, 783 F. Supp. 2d 825, 832 (E.D. Va. 2011) (stating that "it is clear that federal law expressly preempts state law with respect to policy interpretation and claims handling in the flood insurance context"). Additionally, courts have explained that "nowhere in the NFIA or the SFIP does Congress explicitly reference any right of a policyholder to bring extra-contractual claims against a WYO insurer." *Slay's Restoration, LLC v. Wright Nat'l Flood Ins. Co.*, 226 F. Supp. 3d 589, 598 (E.D. Va. 2017) (citation omitted).

Accordingly, the Court finds that Plaintiffs' remaining claims fail as a matter of law. For the reasons set forth above, American Bankers' Motion to Dismiss, ECF No. 56, is GRANTED.

D. Cunningham Lindsey's Motion to Dismiss

In its Motion to Dismiss, Cunningham Lindsey argues in part that: (i) Plaintiffs' NFIA claim against Cunningham Lindsey fails because Plaintiffs failed to file Proof of Loss forms, as required by the insurance policy; (ii) Plaintiffs' non-NFIA claims are preempted under the NFIA; and (iii) Plaintiffs' non-NFIA claims fail to state a claim upon which relief may be granted. *See* Mem. Supp. Cunningham Lindsey's Mot. Dismiss at 9-17, ECF No. 59.

In granting American Bankers' Motion to Dismiss above, the Court determined that: (i) Plaintiffs

cannot collect on their policy-based claims because they did not submit Proof of Loss forms for their flood-related expenses; and (ii) Plaintiffs' state law claims and extra-contractual claims are preempted and/or otherwise fail as a matter of law. *See supra* Part III.C. Based on these determinations, Cunningham Lindsey's motion, which asserts similar arguments for dismissal, is well-taken. Accordingly, Cunningham Lindsey's Motion to Dismiss, ECF No. 58, is GRANTED.¹³

E. GEICO's Motion to Dismiss

Plaintiffs' Second Amended Complaint fails to clearly identify the role played by GEICO in connection with Plaintiffs' flood damage claims. However, the September 2016 Proof of Loss Form and the October 2016 Proof of Loss Form, which are attached as exhibits to the Second Amended Complaint, identify GEICO as the "agent." *See* Sept. 2016 Proof Loss at 1, ECF No. 46-2; Oct. 2016 Proof Loss at 1, ECF No. 46-1. Additionally, GEICO acknowledges for purposes of its Motion to Dismiss "that it was the insurance agency through which Plaintiffs purchased the American Bankers flood insurance policy." Mem. Supp. GEICO's Mot. Dismiss at 2 n.l, ECF No. 55.

¹³ Because the Court determines that dismissal of this action against Cunningham Lindsey is warranted for the reasons set forth above, the Court need not address other arguments raised by Cunningham Lindsey in its Motion to Dismiss. *See* Mem. Supp. Cunningham Lindsey's Mot. Dismiss at 12-17, ECF No. 59.

who Graduated from North Carolina University. Noting that this University worked under President Biden Domestic Violence Bill at the same time Duke University was studying the "10 % of men abused by women" with North Caroline Chapel Hill, North Carolina Black Colleges & Universities, and Students from the Christopher University of Newport News, with the Main Pro'se Petitioner Joyce Beggs; helping to pass the Domestic Violence Bill that also protect men who are injured and attacked by females like Petitioners' son Cornelius Beggs. Written into Law by "Del. Jack Brooks from Taxes and Senator Joe Biden with underground supporters from the State of Texas to The State of Delaware. Watching a great man and Major of Hampton destroyed that allowed Newport News Volunteers to meet with Petitioners in his town just to be close to Fort Monroe fighting for Battered Woman Rights. Caused Petitioner Joyce Beggs to cut connections with the Underground Network for Battered Woman to protect the City of Newport News, Duke University, and all College Students who worked with Senator Biden in N C., and Del. Jack Brook from Texas and 101st Congress (1989-1990). Who Designating October 1989, as "National Domestic Violence Awareness Month".

Being an Aid to Petitioners Jurisdiction

Petitioners Jurisdiction Civil Law Systems need to Protect injured Children and Middle income Families Having no respect for Petitioner's small "Black Children"; Or Federal Government Program like FEMA. With Third Parties Disrespecting HUD Federal Housing Programs like moving them into a

Rotten Home, without the needed construction work before moving Petitioner Children in ~~the Home of~~ work she paid for in 1995. Destroying Petitioner Attorney/Client relationship by Respondents and their Third-Party Insurance Agents in their Jurisdiction using Conspiracy under U S C 42 1985 used to destroy the Lives of Petitioners.

Petitioners and Pro'se Joyce Beggs wants to be free to continue her Studies on the Contraband Slaves with the Queen Street Baptist Church without suffering from said Plotted Conspiracy. "Fighting for Justice for her Family for 29 years as her Husband takes Assignments at all Military Bases across the U.S.

Granting Assigned Attorneys for Petitioners

Needing the U S Supreme Court to assign an Attorney to the Petitioners; as this Case is important to improving our society, and the Petitioners' Jurisdiction. Citing the research by the Student of William and Mary "all People in our society need to be respected". As Said Students and Staff Members at William and Mary Law School are; Focusing of Belonging, Equity, and Inclusion, under Federal Rule of Evidence Rule 60. (1)(2)(3)(d)1.3. Bringing forth a New Agenda for Equity, with planned Actions; plan for real and fundamental change to protect equity in Petitioners' Legal System Jurisdictions. Building on the recommendations of the Law School's 2019 Inclusion Task Force Reports and on conversations with faculty, staff, students, and alumni, asking themselves "Why We Can't Wait" by outlining

necessary actions to further equity and justice for all. Citing William vs. Williams, 24, Va. App.778 783,435, S.E. 2nd 651, 654, 413, (1997).

Moving said U S Supreme Court to invite students at Williams and Mary or an Attorneys to help. As Students and Staff at William and Mary research is showing the important milestone in what Dr. Martin Luther King, Jr., referred to as the "long stride toward freedom." Showing Dr. King wrote, "The mere fact that we live in the United States means that we are caught in a network of inescapable mutuality. Therefore, no American can afford to be apathetic about the problem of racial justice, by Benjamin Spencer. Who is leading this Movement with the Students. Who welcomes ideas and feedback that can come from the United States Supreme Court. With the help of William & Mary Law School faculty, staff, students, alumni, and Community Leaders in the continued quest for social justice and inclusion as the Petitioners continue to suffer as they are being forced to pay for their flood damages and suffer financially for over 29 years. That caused Continued Financial hardship by an organized conspiracy of pure Hatred towards the Petitioners. Voiding out their Family U. S. Constitutional Rights of being "Misunderstood for the wrong reasons. Citing U.S.C. § 1254, 1257, 1985 and 2101(c) using Virginia Third Parties for over 29 years Starting with the Financial Suffering citing Collins v. Hardyman,341 U.S. 651 (1951)

In Petitioner's original Complaint was filed in the U. S. Supreme Court Case No: 06-931, which

shows how Virginia third-party conspirators destroy people they Hate or Misunderstand because they are different by conspiracy to Void their Constitutional Protections under the Thirteenth Amendment and Fourteen Amendment to the United States Constitution that abolished slavery and involuntary servitude. By taking away their Due Process Rights by Civil Conspiracy that works like pure Civil Terrorism under "18 U.S.C. § 241 Section & 243. That makes it unlawful for two or more Respondents and their Powerful Friends and Relatives to agree to injure, threaten, or intimidate a person in the United States in the free exercise or enjoyment of any right or privilege secured by the Constitution or laws of the United States because Petitioners exercising their Federal Rights and researching the Native Americans who helped Great Grandfather get to Fort Monroe Contraband-Slave Camp from North Carolina and Township by Major Benjamin Butler before the Civil War Ended. Just to Find a Home to Farm. Suffering the same Secret Conspiracy used to Run the Contraband Slaves away from areas surrounding Fort Monroe who were not chosen by said Plotters of Conspiracy.

With Pro'se Joyce Beggs citing "Good Cause" for the late filing as Petitioners, Hamer V Neighborhood Housing Services of Chicago, 583 U.S. (2017). A decision by the United States Supreme Court; Stating the failure to comply with the deadline for filing a Notice of Appeal, established by the Federal Rule of Appellate Procedure; rule 2(a)(5)(c), does not necessitate dismissal of a case. As Pro'se

Joyce Beggs showed forth “genuine issue of material facts”.

Showing Fourth New Evidence ‘not produced in Jaburek V. Foxx’ by denying Petitioners continuously Fair Settlement for years; “not in the interests of judicial economy by said Professional Conspiracy Plots to destroy Petitioners”. Showing Forth “good cause found to Reopen all Petitioners Complex citing Georges v. OB-GYN Services, P.C., 335 Conn. 669, 706 (2020). An appellate court “will customarily allow a late filing if ‘unusual circumstances’ or ‘exceptional cases’ justify granting permission. Leaving the Petitioners with the Last option to File an Extraordinary Writ.

Showing Fourth continued planned plots of the American Legal System with the feeling of Domestic Terrorism, with plots to destroy a great Military Family like the Petitioners as shown in all Petitioners Appendix 1, 2, 3, Citing Hamer v. Neighborhood Housing Services of Chicago, 138 S. Ct. 13 (2017).

Waiting for Judgment around 2 years from July 6, 2021; that affected Virginia Beach Circuit Court case CL16004672-00 that affected the Maturity of Virginia Supreme Court No: 20-629 closed during COVID-19 unable to combine all cases of Civil Terrorism under the Patriot Act, in Petitioners Writs in the U. S. Supreme Court Case No: 19-1095, U. S Supreme Court No: 06-931 and Case No: 20-629 of Petitioners Writ for Habeas Corpus. Suffering extraordinary circumstances beyond the control of Petitioners. As Pro’se Joyce Beggs became Sick with

the Flu for over 2 months. As the Virginia Supreme Court wanted to hear from Petitioners after the COVID-19 crisis sending said cases back to the Virginia Beach Court System. While caring for their sickly grandchild, as they showed Fourth “good cause found to reopen all Petitioners Cases Cited”. Suffered a Strange Flooding of their Home in the Middle of their Farming Season on June 23, 2023. Then June 28, 2023, Petitioners received Judgement from case No. 19-1748, as the Petitioners Home was under Flood Waters while trying to save their Historical Heirloom Farming Home and Crops. With a Great loss of their Farming Income, as said plots voided the Constitutional Rights of this Military Family with no fair settlement starting from U. S. Supreme Case No. 06-931 to prolong their financial suffering on a massive scale in these complex cases, that remains a threat to our democracy and the economy guarantees under all Civil Laws because of a “Gross Misunderstood” of the Patterson-Beggs family Structure of a Missed Raced Couple. Strong enough to void out Petitioners’ Civil Rights, and the 13 Amendment. Voiding Petitioners of Fair Appeal Processes in Virginia, Voiding Due Process. Voiding Equal Rights Protection while living under a Virginia Beach Court Order with Mandatory Visitation of a Military Family with Long Distant Traveling 4 times a month with no financial assistance to Petitioners to continue the financially Suffering. While Petitioners are being forced to sign, incorrect FEMA Flood Documents as Stated in the ruling of the Fourth Circuit Court under U.S.C. 1254. Being sighted by the Fourth Circuit because Petitioners refuse to sign Incorrect Fraudulent Statement & Fraudulent

Settlement. Strong enough to void out Petitioners; Civil Rights, the 13 Amendment, Voiding Equal rights protection, While Living: under a Virginia Beach Court Order with Mandatory Visitation with no financial help from Virginia Beach Court Order for a Military Family. Blocking said Husband & Wife from Traveling on Assignments at Military Bases together. Showing forth plots suffered by Respondents and their Third Party under Civil Law void protections under Act Passed by Congress Passed by Civil & Domestic Terrorism under 18 U.S.C. § 2331(5) under U.S.C.28 § 2254 - State custody; remedies in Federal Courts, of the U. S. Code;

Petitioners call "Civil Terrorism" over 29 years of Civil litigation up to the U. S. Supreme Court. With Proof "said child Lauryn Beggs" was Clearly Kidnapped from the Petitioners on July 20, 2011, after Business Hours by Professional Conspiracy Respondent Cynthia King from Virginia Beach to collect money from the Public for a "GoFundMe" Page. With said fund not used properly used from "Said Child" nor Petitioners. While Petitioner use their Own Saving to Care for her Financially well-being. Dovel v. Bertram,184 Va 19, 22, 34 S.F.2d

Negatively affecting this Great Historical State of Virginia. Forcing the Pro'se Petitioner Joyce Beggs to explain to this Court her Background History to stop this misunderstanding of her Research on Domestic Violence helping support Senator Violence Bill in Congress. Showing forth Third Parties belonging to Defendants/Respondents; Involved Acts that are dangerous to life and that violate the

Criminal Laws & Civil Laws Systems of the United States in any state, under Domestic Terrorisms & Civil Laws with intentional Plots to intimidate and coerce a civilian population suffered by Petitioners in her Jurisdiction, willfully destroying 70% of Middle Income Black Families who are not connected to Plot Systems for Survival to avoid Retaliation. Giving Respondents and their Third Parties every Flood Supported Receipts from Flooding Contractors to Repair Petitioners Home. Even Showing Violation of the Civil Right Act as Petitioners change their Flood Insurance Companies getting the Same Third-Party Respondents in the Petitioners' Jurisdiction, under the Federal FEMA Program will destroy 70% of American Black Families & Military Families financially in losing their Homes, Income, and their Saving, after Flooding. When Flooding is not considered a National disaster like Hurricane Isabell. Should not be used as a tool by Third Parties in any Legal Actions to destroy people who are hatred for being different or a mixed-race couple like the Petitioners. Citing Dovel v. Bertram, 184 Va 19, 22, 34 S.F.2d. Page10. Also Citing Jaburek v. Foxx, 813 F.3d 626, 630 (7th Cir. 2016), Good cause found when the litigant's attorney had been diagnosed with gout when the appeal was due".

Conclusion

Wherefore the United States Supreme Court has Jurisdiction to Hear Petitioners Extraordinary Writ should be Granted. Needing this Court to assign Special Council/Attorney to the Petitioners: As they are a Military Family of the United States being

Forced to pay "most to all" of their own Flood Mitigation as Planed out Financial Suffering they Call Civil Terrorism.

We ask for this:

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Pro'se James Beggs
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