

No. 24-6137,

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IN THE SUPREME COURT OF UNITED STATES

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Alicia A. Epps, Pro Se  
*Petitioner*

vs.

Poah Communities LLC,  
*Respondent*

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ON PETITION FOR A WRIT OF CERTIORARI TO  
THE OHIO SUPREME COURT

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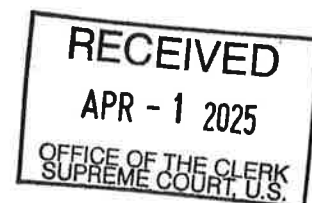
PETITION FOR REHEARING

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Respondent.



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## PETITION FOR REHEARING

In accordance with this court rule 44.2 petitioner respectfully seek rehearing of court's order denying certiorari based on the intervening decision in *Cincinnati metropolitan hsg.v. Browning* trial court entry of judgment in favor of the defendant Browning reverse judgement and remanding cause for further proceedings in *ability center of greater Toledo v. James E. Moline Builders et.al. n.d.ohio* court issue order granting partial summary judgment in favor of the plaintiff, the misuse of power, possessed by virtue of state is made possible because wrongdoer clothed with authority of state law, in *Monroe v. Pape*, 365 U.S. 167, the invasion of their home, subsequent search without a warrant and arrest detention of Mr. Monroe without a warrant without arraignment constitute deprivation of rights privileges, immunities secured by constitution as so this case when federal and state agencies conspire against petitioner retaliation for exercising the right's guaranteed by the *constitution* even question similar petitioner subject to unlawful behavior by federal and state endanger protected class, conspire to oppress or silence petitioner include mail tampering violating 18 U.S.C. § 1708, throwing family cat from window pursuant to O.R.C. 959.13, destroy or steal precious memories of a late mother left to a disabled daughter taking, pretend to care, or help only manipulating T.E. disabled pursuant O.R.C. 2111.01, Sup.R. 66, and O.R.C. 5213.13, hiding T.E. from grandma petitioner, then lie to the municipal court magistrate about T.E. seeing doctor, continuing same conduct just lied about forcing petitioner to seek injunctive relief, lawyer intentionally violating rules of professional conduct and judicial code of conduct,

This case asks whether are not Political Sub-Division for the City of Cincinnati can make it's own Laws evicting and victimize citizens or tenants ignore the Federal Law put in place to protect citizens or tenants resort to retaliation destruction personal property, violence, against its tenant's for exercising rights guaranteed by *constitution* constitute deprivation of rights and privileges, or immunities secured by *constitution* see in *Cincinnati metropolitan hsg. v. Browning* a civil appeal from Hamilton county municipal court the petitioner alleging violations under fourteenth amendment accusing Poah their lawyer Christopher Jones (92351) acting under color of statutes, ordinances, regulations, customs and usage of city Cincinnati without order of any

court, without notice to petitioner, nor permitting or requiring T.E. disabled under *o.r.c.*2111.01, *sup.r.*66 and *o.r.c.*5123.62 to see an doctor requirement for application for guardianship filed by petitioner in probate court case no. A2400144, case maybe affected by recent mail tampering, occurred in December when respondent on the advice of lawyer caused the petitioner mail to be returned to sender petitioner haven't heard about some cases other's dismissed, mail tampering intentional by poah/lawyer to distract or affect outcome of the petitioner other cases petitioner allege lawyer lie to municipal court magistrate about T.E. seeing a doctor for reason of the application file by petitioner in probate court after the petitioner made appointments on the behalf of T.E. interfering family member's refused without court order to allow petitioner to take hiding T.E. missing all appointment's, the same family member's responsible for taking T.E. to prevent petitioner from completing application

Poah/lawyer join in conspiracy to keep T.E. from seeing doctor effectively hiding T.E. and taking across state lines, with the help of ODJFS, the petitioner taken off case run by State agencies as authorized representative for T.E. stating T.E. never authorized petitioner this violate *o.r.c.*2111.01 require doctor a State agency required to protect rights of a person with development disability endangering this protected class under *o.r.c.*5123.62, after Poah a Federal Agent reported something about petitioner to ODJFS causing ODJFS to remove petitioner immediately from T.E. case did not inform petitioner, petitioner don't know anything about T.E., despite filing only application for guardianship in probate Court entries given to then ignored by both ODJFS a state agent and the respondent a federal agent conspiracy pursuant to *o.r.c.* 2923.01 to prevent petitioner from completing application filed in probate court for guardianship of petitioner's disabled grand-daughter T.E. intentional acts by housing authority

That knows T.E. is disabled reported years earlier by Tempest "rip" that T.E. disabled due to autism, brown knows this and the fact petitioner lived at freeman years before, still in violating *r.s.* 1979 42 *u.s.c.*§1983, tried unlawfully, without notice, that same day, out of retaliation attempt to evict the petitioner from 1921 freeman housing shared with T.E. and Tempest "rip" the deceased biological mother of T.E. and biological daughter to petitioner

refused to leave claim poah violate next of kin rights *o.r.c.*2105.06 conspiring with same family member's responsible for taking T.E. without court order, refuse to return T.E. and T.E. cannot return on own, especially since held somewhere in Kentucky petitioner have not been allowed to see granddaughter petitioner believe to instill fear in T.E. taking from only family T.E. knows, T.E. do not understand any of this and petitioner nor T.E. should been subject to this by state and federal agent hiding protected person without court order violating state and federal laws, conduct is intentional unprovoked and retaliatory poah/lawyer filed eviction against only petitioner not T.E. listed on lease as a household member, petitioner on lease as next of kin poah ignore application filed in probate court by petitioner, attempting to have T.E. returned gave probate court entries to all the defendant's, poah/lawyer intentionally lied to the magistrate about T.E. seeing a doctor, poah intentionally continue same conduct lied about, made T.E. head of own household without seeing a doctor, without knowledge of petitioner conspiring with the same family member's responsible for taking T.E., to hide T.E. from petitioner in federally funded public housing, possibly under poah control using authority provided by federal government to interfere with ODJFS case and have the petitioner removed as the authorize representative despite application filed by petitioner in probate court violating 42 u.s.c.8013 and enacting 1979,

Congress intended to give remedy to parties denied *constitutional* right's, privileges and immunities an official abuse, usage, of any state or territory can show no authority under state law custom or usage to violate the *constitution* the purposes of this legislation is to afford federal right in federal court because by reason of prejudice, passion, neglect, intolerance, or otherwise state law is not enforced and claims of citizens to enjoyment of rights, privileges immunities guaranteed by fourteenth amendment may be denied by any state agencies misuse of power possessed by virtue state law is made possible because of an wrongdoer clothed with authority of state law and *under color of* state law within meaning of 1979, *united states v. classic*, 313 u.s. 299, and *screws v. united states*, 325 u.s.91, petitioner claim respondent with

Help of lawyer both under authority of federal government display pattern or practice of violating 1979 or evicting citizens without reason resort to retaliation even violence, against citizens the petitioner tried to assume next of kin rights after sudden death to Tempest Epps "rip" to respect, honor Tempest "rip" wishes provide for T.E. only off spring

of Tempest “rip” both are on poah lease Tempest as Head of house, T.E. as a member, and only one on lease after passing of Tempest “rip” petitioner in agreement with poah at this time attempt to sign lease as next of kin, respondent agreed first to the petitioner signing lease even changing locks to door and mailbox giving petitioner new keys although petitioner hadn’t signed lease with poah yet, unaware of childlike plan or conspiracy between family member’s their friends to first take over apartment petitioner don’t believe these defendant’s planned to take T.E. at this time, improvised and taking T.E. after petitioner tricked krystal and Life out apartment, forcing petitioner to file application for guardianship in probate court seeking to have T.E. returned to petitioner, court entries ignored by all defendant’s now enjoined in conspiracy pursuant to civ.r.65, with the defendant in this case making *conspiracy* a criminal act under 18 *u.s.c.* §241 to injure, oppress, threaten or intimidate any citizen in free exercise of enjoyment, of right or privilege around september 2023

Nathasa Brown former poah property manager, no longer employed by poah first in conspiracy with family member’s attempting to evict petitioner in 5 minutes, accompanied T.E. saying T.E. need help to get item’s out apartment despite the petitioner objection’s brown allowed Shirley Colbert, krystal guley, Lashawnda willaims, and eric Colbert entry into apartment at 1921 freeman knowing the petitioner only one living at apartment, since family member’s responsible for taking T.E. without court order to do “cash app. or go fund me” and interfering with application filed by petitioner legal next of kin to T.E. and why taken in first place, petitioner believe brown’s firing reason for retaliation

After assaulting petitioner at 1921 freeman days after death of only daughter Tempest “rip” fighting, arguing followed ending with brown calling police to remove petitioner from home shared with Tempest “rip” and T.E. off/on since 2013, brown knows this fact but conspiring with family member’s allowing entry into apartment despite none on lease, instructing police to take back keys given to petitioner months earlier, before the realization family member’s had no plans to return T.E. poah never added petitioner to lease decided to side with family member’s despite petitioner filed only application in probate court to have T.E. evaluated by court for purpose of application entries given to all by the petitioner hoping to have T.E. returned quickly entries ignored first by family member’s conspiring with friends pursuant to *o.r.c.* 2923.01, threaten petitioner witnessed by anyone watching, at Tempest ‘rip’ services T.E. ripped from petitioner’s arm’s by family

member's wanting to take advantage of tragedy befallen Tempest "rip" scared T.E.

Defendant's attack grandmother petitioner no respect T.E. just lost Mom now family member's won't leave freeman police won't help will not allow T.E. peace only confusion T.E. not use to excitement usually enjoy quiet environment due to Autism defendant's don't even respect that, knows nothing about autism pressure T.E. to make decision's unable to make disability prevent it, family members now poah/lawyer defendant this case join conspiracy tell ODJFS whatever having petitioner removed as T.E. authorized representative without notice or warning leaving decision that should be made by petitioner, to be made by someone else not T.E. unable scared, of these desperate individuals take advantage of T.E. limited communication skills will not allow peace to petitioner nor T.E. petitioner haven't seen T.E. in months because poah/lawyer under authority of federal government and ODJFS state agent responsible for helping petitioner and T.E. instead of intentionally violating r.s.1979 42 u.s.c.§1983,

Poah communities llc. don't recognize r.s.1979 42u.s.c.§1983, public funded housing authority for hamilton county may 23 2024, evicted the petitioner from federally subsidized housing violating *o.r.c.*1923.01 without proper notification *o.r.c.*5321.01 retaliation resort to violence against petitioner, case only heard on merits in municipal court Poah lawyer lie to magistrate about T.E., petitioner disabled granddaughter seeing a doctor to satisfy requirement of application for guardianship filed by petitioner September 2023, after T.E. taken by family members without court order to interfere with application, interference causing Poah to file eviction against Tempest Epps and all other occupant's in which the petitioner is only one evicted, leaving T.E. disability prevent T.E. from living on own now with poah giving housing, ODJFS giving food and medical assistance possibly allowing helping family member's to file for T.E. Supplemental Security Income family member's unable to access this information usually but with the help of the respondent conspiracy with ODJFS is now possible accessing private information concerning T.E. possibly the petitioner without court order, one reason family member took T.E. attempting to take advantage recent tragedy, would've returned T.E. by now but since Poah/lawyer conspiracy family member's believe have legal right to T.E. despite ignoring the petitioner application for guardianship probate court endanger T.E. *o.r.c.*2903.341

## REASON TO GRANT WRIT OF CERTIORARI

Tragedy befallen Tempest Epps T.E. “rip” maternal mother of T.E. killed in drive-by shooting outside apartment at 1921 freeman family member’s wanting to do and did without consent from any Epps “cash app. or go fund me” took T.E. petitioner report this to every agencies seeking to have T.E. returned resulting in numerous civil suits against a number of defendant’s, filed counterclaim against Poah alleging the eviction was unlawful before this court on petition for rehearing, the petitioner also ask this court to grant temporary restraining order and preliminary injunction seeking emergency assistance to stop Poah and lawyer Christopher Jones to redress deprivation under color of State law, statute, ordinance, regulation, custom or usage, of right, privilege or immunity secured by *constitution* the conspiracy pursuant 2923.01 involves state agency ODJFS, and the family members responsible for taking and hiding T.E. without court order in attempt to prevent the petitioner from completing application for guardianship filed in Probate Court,

Poah and lawyer conduct so outrages petitioner filing a additional claim name the two as defendant’s and ODJFS co-defendant seeking emergency injunctive relief to stop state and federal agent’s act under color of state violating r.s.1979 42u.s.c.8013, conspiring with the same family members to hide T.E. from petitioner endanger T.E. violations include mail tampering 18 u.s.code§1708, cruelty to animals *o.r.c.*959.13, furniture destroyed or stolen a fact T.E. denied, Poah out of control Poah allowed to continue this behavior unchecked reason to grant writ of certiorari, Plaintiff eviction Case heard in the Municipal court and Common Pleas the petitioner filed a motion for summary judgment respondent eviction notice did not contain mandatory 3-day notice, r.c. 1923.01 court allowed eviction despite petitioner filed motion to stay eviction, the eviction granted without hearing held on motion for stay filed by the petitioner held,

First District Court of Appeals Dismissed Case without review filed as appeal as of right, Ohio Supreme Court declined Jurisdiction leaving only this Court to apply the only review, Poah displaying pattern or practice of abuse or evicting tenant without reason, and without fear of repercussion using retaliation to instill fear leaving citizens worst off living in public housing, hide behind federal laws put in place to protect from repercussion unfairly single’s out citizens of low-income, uneducated or unlikely to afford the cost of litigation,

these citizens can lose everything to unlawful eviction from public housing for protection department of housing and urban development issue regulations statute title 24 c.f.r. and the *affordable housing act* 42u.s.c.§8013, supportive housing for person with disability run by state through medicaid and chip program 42 u.s.c.§1396 secretary of housing and urban development under (b)(1) provide tenant based rental assistance to eligible person with disabilities in accordance with subsection (d)(4), Poah/lawyer incorporated it's own set Laws,

## PROTECTED CLASS

Petitioner believe this happened in this case, a pro se litigant fit in category of low-income, self-educated, to take advantage of this fact, poah/lawyer lied to municipal court magistrate about T.E. seen doctor this followed by objection from petitioner pointing out this was not true, the petitioner filed only application for guardianship pursuant sup.r.66, o.r.c.2111.01 and o.r.c.5123.62 on behalf of T.E. as next of kin, the interference of family member's now conspiring with the respondent in this case hiding disabled granddaughter of petitioner to prevent completion of application filed in the probate court by petitioner poah/lawyer violating r.s.1979 42 u.s.code§1983 evidence the unlawful eviction filed against petitioner without fear, proof of retaliation is the petitioner reported to ODJFS that family member's taken T.E. seeking help in having T.E. autism prevents T.E. from returning on own depended on help, ODJFS never offered petitioner any help in having T.E. returned, conspired for whatever reason with family member's and poah/lawyer without court order

If the petitioner did something wrong never told why, by State agency just taken off T.E. case as the authorized representative by ODJFS stating T.E. never authorized, petitioner to be authorized representative ignoring probate court entries at the suggestion of Poah/lawyer, both these State and federal agencies ignore probate court entries intentionally, endangering T.E. under o.r.c.2903.341, ignore federal statute's leaving citizens without housing in the Epps case evict for no reason and out of retaliation itself a violation and destroying or stealing furniture, manipulating, taking across State lines, misrepresenting a protected Class 42 u.s.c.1396(b)(1) provide tenant based rental assistance to eligible persons with disability in accordance with subsection (d)(4) endangering mentally challenged

also accuse lawyer Jones of violating rules of professional conduct and the judicial code of conduct about unfair treatment of petitioner granddaughter disabled due to Autism pursuant *o.r.c.*2111.01, and *sup.r.*66, *o.r.c.*5123.62, rights of person with developmental disability

Poah under advice from lawyer Jones has interfered in petitioner other cases by tampering with mail having petitioner mail returned to sender, helping now family member's effectively hide T.E., without court order, none of the defendant's have court order these family member's taking T.E. can't afford to keep T.E. needing help from the defendant's this case Poah/lawyer and ODJFS or T.E. would've been returned to petitioner by now, with help from Poah been given keys to T.E. federally funded housing without court order violating 42 *u.s.c.* 1437(f)(4)(c), eligible families meets eligibility criteria, Poah using a guise made T.E. head of household, not requiring T.E. to see doctor, to avoid input of petitioner legal next of kin, filed only application for guardianship is endangering T.E. violating 42 *u.s.c.* §8013 and ignore petitioner application filed in probate court entries to have T.E. seen by doctor in doing so denying petitioner responsibility of application opportunity to care for T.E. without court order if not for conspiracy existing between defendant, lawyer and ODJFS, T.E. would've been returned to petitioner by now

Poah lawyer intentionally influenced Ohio Department of Job and Family Services ODJFS petitioner not told information about case or T.E. by Poah, ODJFS despite filing the only application in probate court cause state run agency to stop petitioner from being authorized representative on behalf of T.E. after making petitioner authorized representative removed suddenly without explanation petitioner denied access to disabled granddaughter pursuant *o.r.c.* 2111.01 given to same family member's responsible for taking T.E. without court order by Poah/lawyer conspiring with a state agency ODJFS, petitioner have not seen T.E. in months, scared and hidden across state lines with psychopaths that refuse to return T.E. and to interfere in petitioner other cases causing cases to be dismissed, the mail tampering involve federal agency as such any theft or tampering with mail violate federal statues, and example of Poah/Jones conduct disrespect for all things including federal laws, Entries provided by Probate Court ignored by Poah/lawyer federal laws involving T.E. a disabled adult protected by federal laws, again ignored by Poah insist T.E. be made head of household never requiring T.E. to see a doctor endangering T.E. even lied to magistrate saying T.E. seen a doctor


petitioner objected pointed out to court that petitioner responsible to take T.E. to doctor, not allowed by family members with no court order responsible for taking T.E. same family member's Poah/lawyer in conspiracy with in hiding T.E. in federally subsidized housing will not tell petitioner where, having to seek information through injunction filed against Poah/Jones, also ODJFS for giving same family members responsible for taking T.E. without court order access to private information and making T.E. head of household giving control of EBT card to T.E. don't know nothing about EBT card or how to fill out application for housing or the application regarding EBT card not requiring T.E. to see doctor

New rulings justifying a petition for rehearing in determining what intervening or new circumstances would justify a petition for rehearing other new circumstances would justify petition for rehearing from a denial of certiorari, most common type is a new and conflicting decision by another court of appeals *stephen m. shapiro et al. supreme court practice* 15.6(b) (11<sup>th</sup> ed. 2019), for example court grant rehearing and certiorari on this ground in *sanitary refrigerator co. v. winters*, 280 u.s.30, 34n.1(1929), and in *kent recycling services,llc v. u.s.army corps of engineers* 136 s. ct.2427 (2016), court granted petition for rehearing based on new lower court conflict see *mcgrath v. mfrs. Trust co.* 338, u.s. 241, 245-246 (1949); *united states v. ohio power co.* 353 u.s. 98,(1957) court should grant rehearing for similar reason here would be arbitrary to deny review

## CONCLUSION

The court should grant petition for rehearing and grant petition for a writ of certiorari

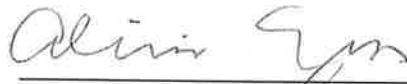
respectfully submitted,



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CERTIFICATE OF SERVICE

I certify a copy of this petition for rehearing was sent by ordinary u.s. mail to the Counsel for Appellee Poah Communities, and Christopher Jones (92351), 2623 Erie Avenue, Cincinnati Ohio 45208, Stagnaro, Saba & Patterson Co. LPA, on March 17, 2025,

A handwritten signature in cursive script, appearing to read "Alicia Epp", written in dark ink.

Plaintiff Alicia A. Epp Pro Se

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No. 24-6137,

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PETITIONER CERTIFICATION OF COUNSEL

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Respondent.

Pursuant to Supreme court rule 11,1. Alicia A. Epps, no counsel proceeding

Pro Se for Alicia A. Epps, Pro Se, and Certify the following

1. My name is Alicia A. Epps, and my address is 1845 Larchwood place,  
Cincinnati Ohio 45237,
2. I am not a member in good standing of the bar of the u.s. supreme court I  
filed this petition Pro Se and proceeded *in for pauperis*
3. I am the counsel of record for Alicia A. Epps, Pro Se, in this case
4. My telephone number is (513) 930-8441, and my email address is  
lisaann86770@gmail.com
5. Disclosure: I have no known conflict of interest in representing Alicia A.  
Epps, self, in this matter

6.   
Alicia Ann Epps, Pro se

March 27, 2025