

No. 24-6475

**IN THE SUPREME COURT OF THE
UNITED STATES**

CHARLENE A. GREENE-RODRIGUEZ,
PETITIONER(S)

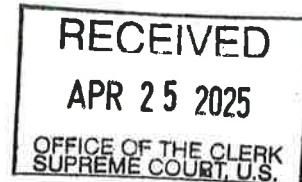
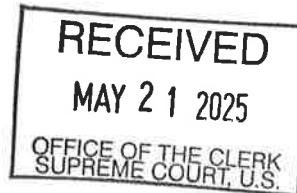
v.

DEPARTMENT OF EDUCATION FROM PUERTO RICO
RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI
TO THE SUPREME COURT OF PUERTO RICO

PETITION FOR REHEARING

Charlene A. Greene-Rodríguez
Pro SE
PO BOX 446
San Antonio, PR 00690
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443-346-3994



CERTIFICATE OF COMPLIANCE

No. 24-6475

Charlene A. Greene-Rodríguez,
Petitioner(s)

v.

Department of Education from Puerto Rico
Respondent(s)

As required by Supreme Court Rule 33.2(b), I certify that the petition for a rehearing contains 7 pages, excluding the parts of the petition that are exempted by Supreme Court Rule

33.1(d).

I declare under the penalty of perjury that the foregoing is true and correct. Executed on April 19, 2024

All parties appear in the caption of the case on the cover page.

All parties do not appear in the caption of the case on the cover page. A list of all parties to proceedings in the court whose judgment in the subject of this petition is as follows:

Solicitor General of the United States
Room 5616, Department of Justice
950 Pennsylvania Ave., N. W.
Washington, DC 20530-0001

Secretary of Justice of the Commonwealth of Puerto Rico
Gobierno de Puerto Rico
Departamento de Justicia
Apartado 9020192
San Juan, PR 00902-0192
787-721-2900
787-724-3380

Secretary of the Department of Education of the Commonwealth of Puerto Rico
Departamento de Educación/ División Legal
Lcdo. Nolan Portalatín Cepeda
/Lcda. Abigail León Cruz
PO BOX 190759
Hato Rey, PR 00919-0759
787-773-4021 / 773-4028

TABLE OF CONTENTS

PETITION FOR REHEARING.....	1
REASONS FOR GRANTING REHEARING.....	1-7
CONCLUSION.....	7
CERTIFICATE OF COUNSEL.....	8

INDEX TO APPENDIX

APPENDIX A—Writ of Certiorari No. 24-6475.....	See Writ of Certiorari
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TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBER
Brown v. Bd. Of Education of Topeka	
<i>Brown v. Bd. of Education of Topeka</i> , 347 U.S. 483 (1954).....	See Writ of Certiorari 24-6475
Vergara v. State of California	
<i>Vergara v. State of California</i> , 246 Cal. App. 4th 619 -	
Cal: Court of Appeal, 2nd Appellate Dist., 2nd Div.	
2016.....	See Writ of Certiori 24-6475

Constitutional ProvisionsSee Writ of Certiorari 24-6475:

CONST. EE. UU. amend. IX, X, XIV

CONST. EE. UU. art. II

CONST. PR art. II, § 7.

CONST. PR art. II, § 16.

CONST. PR art II, § 1.

CONST. PR art II, § 8.

CONST. PR art II, § 4.

Lower Court.....See Writ of Certiorari 24-6475 Cover Page and opinions:

THE SUPREME COURT OF PUERTO RICO/ AC-2024-0032/
October 4, 2024

SUPREME COURT OF THE UNITED STATES

PETITION OF REHEARING

Charlene A. Greene-Rodríguez firmly and respectfully petitions for a rehearing. The petitioner pleads on behalf of her substantive and procedural due process rights for her tenure job as a school principal, which was arbitrarily separated from 2014 to the present, without the corresponding procedural steps. This termination of her career or employment as an employee of the Department of Education in Puerto Rico, without violating laws in her position as a school principal, is a clear case of abuse of authority and a lack of fairness that needs to be addressed.

For more than a decade, since 2014, the petitioner has made her claims in Puerto Rico district court or trial courts known as "Tribunal de Primera Instancia en Aguadilla, Puerto Rico"; circuit courts or appellate courts known as "Tribunal Apelativo de Puerto Rico," and at the Supreme Court level known as "The Supreme Court of Puerto Rico/ El Tribunal Supremo de Puerto Rico." However, the

decisions rendered in all these instances have consistently failed to apply the United States Constitution, the Commonwealth of Puerto Rico Constitution, and their corresponding statutory laws. This failure has resulted in a serious violation of the due process of law and equal protection of the laws. The petitioner begs under US Constitution amendment XIV § 1 for a dignified life that she deserves and needs as all US citizens and all human beings around the globe.

REASONS FOR GRANTING REHEARING

This Court's Rule 44.2 authorizes a petition for rehearing. The petitioner alleges that she has been deprived since 2014 of her dignified life, liberty, and property, as guaranteed by the U.S. Constitution amendment XIV § 1, and lacked equal protection of the laws. Deprivation includes her right to decide her working location and to retire upon her decision, as well as her property, which consists of a tenured job as a school principal at Salvador Fuentes Valentin High School in Aguadilla, Puerto Rico. The Constitution states, "...nor shall any State deprive

any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws." (U.S. CONST. amend. XIV, § 1)

- I. The Puerto Rico Department of Education, the Department of Justice, and the three branches of the judiciary have removed the petitioner's constitutional, statutory, civil, and human rights. Their refusal to resolve the petitioner's dispute, which has persisted for over a decade, is a severe violation of the Constitution of the United States of America and the Constitution of the Commonwealth of Puerto Rico. This is a serious issue that cannot be overlooked.
- II. It has taken more than 10 years to reach the US Supreme Court, the only and last court that can restore the petitioner's rights about her property and her permanent job, which guarantees due protection. However, in the petitioner's case, due protection and equal rights were transgressed to the point that the

abuse of power inherent in the Department of Education of Puerto Rico kept her out of her job without her salary and corresponding benefits.

Suppose the US Supreme Court does not solve the petitioner's conflict on the transgression of her rights. In that case, there is no other place she will find to restore her to her tenure job, and the guarantee of due protection and equal rights will permanently vanish, leading her to an indigent old age.

1. The petitioner was unfairly instructed to resign from her permanent job and give up her tenure as principal at Salvador Fuentes Valentin High School. The verbal order was not only made without due process but also discriminatory and arbitrary, denying her the opportunity to challenge its legality. This case's lack of equal rights is evident, and there was no legal justification for such an order.

2. By not signing her resignation from her permanent position as a school principal consecutively, she was subjected to retaliation. She received a letter summoning her immediately from her employment, a clear violation of due process. This immediate termination disregarded the equal and property rights established in the Constitutions of both the United States of America and the Commonwealth of Puerto Rico and statutory laws.
3. While the Department of Education administrators continued to spend months and years of run-over and not obtain the signature of the petitioner's resignation, she received another letter removing her sharply from her permanent position without providing any hearing to provide her argument or any corresponding legal procedure to remove an employee from her permanent position and without the person

having committed any offense were not performed. All the petitioner's constitutional, statutory, civil, and human rights were violated by abuse of authority, and there is nowhere to turn in Puerto Rico because they have closed access to justice in the places created to resolve conflicts and provide justice. This unjust removal has affected not only the petitioner but also the students and the quality of education in the school, as shown in the Department of Education data. Equality protection of the law is null for the petitioner.

III. As with all citizens, the petitioner is entitled to the fundamental right of due process of law and should not be denied equal protection of the laws. For over a decade, the petitioner has endured discrimination, a clear violation of these rights. This violation underscores the pressing need for justice and is a compelling reason for her rehearing request.

CONCLUSION

The justices should grant the petition for rehearing and the writ of certiorari for the reasons appearing in the petition for rehearing and the writ of certiorari. Charlene A. Greene-Rodríguez respectfully petitions for a rehearing, asserting that she was a victim of an abuse of authority. Therefore, the petitioner plea for the reinstatement of her tenured job as a school principal in Salvador Fuentes Valentin High School in Aguadilla, Puerto Rico, from which, without committing any fault in her functions, was separated from her job arbitrarily and without the corresponding procedural steps. She emphasizes that her career was terminated without due process, violating her constitutional, statutory, civil and human rights as an employee of the Department of Education in Puerto Rico, and she lacked equal protection from the laws.



Charlene A. Greene-Rodríguez,
April 19, 2025
No.24-6475

CERTIFICATE OF COUNSEL (PRO-SE)

As Pro-Se for the petitioner, I hereby certify that this petition for rehearing is presented in good faith and not for delay and is restricted to the grounds specified in Rule 44 (2); the grounds are limited to intervening circumstances of substantial or controlling effect or to other substantial grounds not previously presented.



Charlene A. Greene-Rodríguez
Date: April 19, 2025
No.24-6475

APPENDIX

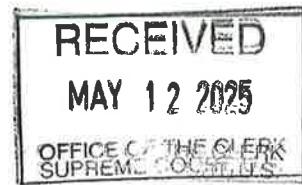
See Writ of Certiorari 24-6475

CERTIFICATE OF COUNSEL (PRO-SE)

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Charlene A. Greene-Rodriguez
Date: April 19, 2025
No.24-6475



**SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001**

April 25, 2025

Charlene A. Greene-Rodriguez
PO Box 446
San Antonio, PR 00690

RE: Greene-Rodriguez v. PR Dept of Edu
PRSC No. AC-2024-0032
No: 24-6475

COPY

Dear Mrs. Greene-Rodriguez:

The petition for rehearing in the above-entitled case was postmarked April 24, 2025 and received April 25, 2025 and is herewith returned for failure to comply with Rule 44 of the Rules of this Court. The petition must briefly and distinctly state its grounds and must be accompanied by a certificate stating that the grounds are limited to intervening circumstances of substantial or controlling effect or to other substantial grounds not previously presented.

Please correct and resubmit as soon as possible. Unless the petition is submitted to this Office in corrected form within 15 days of the date of this letter, the petition will not be filed. Rule 44.6.

Sincerely,
Scott S. Harris, Clerk
By:


Angela Jimenez
(202) 479-3392

COPY

Enclosures

IN THE SUPREME COURT OF THE UNITED STATES

No. 24-6475

Charlene A. Greene-Rodríguez – *Petitioner (s)*

VS.

Department of Education from Puerto Rico – *Responder (s)*

PROOF OF SERVICE

I, Charlene A. Greene-Rodríguez, do swear or declare that on the April 23, 2025, as required by U.S. Supreme Court Rule 44.2, I have the enclosed PETITION OF REHEARING on each party to the above proceeding or the party's counsel, every other person required to be served, by depositing an envelope containing the documents in the United States mail properly addressed to each of them and with first-class prepaid, within 3 days calendar.

The names and addresses of those served are as follows:

Solicitor General of the United States
Room 5616, Department of Justice
950 Pennsylvania Ave., N. W.



Washington, DC 20530-0001

Secretary of Justice
Gobierno de Puerto Rico
Departamento de Justicia
Apartado 9020192
San Juan, PR 00902-0192
787-721-2900 / 787-724-3380

Department of Education/ Legal Division
Departamento de Educación/ División Legal
Lcdo. Nolan Portalatín Cepeda /Lcda. Abigail León Cruz
PO BOX 190759
Hato Rey, PR 00919-0759
787-773-4021 / 773-4028

I declare under the penalty of perjury that the foregoing is true
and correct.

Executed on April 23, 2025