

No. _____

IN THE

SUPREME COURT OF THE UNITED STATES

Luis Angel Perez

Luis Angel Perez

— PETITIONER

(Your Name)

vs. /

New York City Dept. of Education

RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

United States Court of Appeals
For the Second Circuit

(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

District Court
of the
Southern
Dist. of
New York.

PETITION FOR WRIT OF CERTIORARI

Luis Ange/Perez

(Your Name)

130 West 228th Street Apt. 1G

(Address)

Bronx, New York 10463

(City, State, Zip Code)

(347) 771-2839

(Phone Number)

_____ x

Re: COURT OF APPEALS DOCKET # 17-3111 (RAK) (COW);
District Court Case # 15-CV-7156 (PAE), (KNF), & (LAP).

Luis Angel Perez, Educator, :
Plaintiff, :
-against- :
New York City Department of Education :
Defendant. :

Also Related To
Court of Appeals docket #17-55 (RAK) (COW) Perez v NYSUT/UFT Union;
District Court Case # 15-CV-8023 (LAP),

& the now well over eight-hundred (800) pages of critical evidence mostly in the
form of contemporaneous emails, notes, & official reports, already in the courts.

QUESTIONS PRESENTED

_____ x

Wednesday, March 07, 2018

Should Public Officials of the New York City Department of Education (DOE) & the New York State United Teachers/United Federation of Teachers (NYSUT/UFT) Union be held accountable & liable for damages caused by their incessant immoral, unethical, unconstitutional gross harassment, intentional infliction of emotional & physical distress, rampant multi-level discriminatory infractions, & their repeated nefarious efforts to obstruct due process of law & fair investigations by intentionally lying under oath, suppressing critical evidence, using misinformation, engaging in the subornation of perjury & other abuse of power tactics used to purposely & dangerously cover-up their malicious actions & derail, & oppresses justice especially for, but not limited to, those who are unconstitutionally & disproportionately segregated & repeatedly denied equal services & equal protection of the law?

Should Officials of the United States District Court of the Southern District of New York & United States Appeals Court For The Second Circuit of New York be held accountable & liable for helping to weaken "*the firmest pillar of good government*" by allowing DOE & Union & allowing their own personal illicit biases to cloud fair & impartial judgment, for making it impossible to litigate such public interest infractions & grievances before an open Court & Jury by outright lying on the record, misrepresenting facts, misrepresenting Magistrate Judge's ruling, repeatedly denying requests for medical injunction & requests for help of counsel then lying about it & attempted to cover-up, & for oppressing indigent litigation, due diligence, & denying Educator Mr. Perez the right to his day in Court?

LIST OF PARTIES

- ☒ 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 the proceeding in the court whose judgment is the subject of this petition is as follows:

_____ x

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Wednesday, March 07, 2018

APPENDIX A: Evidentiary Report – Perez, Luis A. Devil Is In The Details: Subornation of Perjury Part 2, March 2017: 20 pages
(back to back). Copies of said documents were also mailed via USPS Priority Mail Express to Defendant.

APPENDIX B: Decision of United States Court of Appeals.

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SUPREME COURT OF THE UNITED STATES WASHINGTON, D.C. SUPREME COURT DOCKET # _____

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New York City Department of Education :

Defendant. :

**STATEMENT OF THE CASE &
CONSTITUTIONAL/STATUTORY VIOLATIONS**

_____ x

Wednesday, March 07, 2018

Dear Honorable United States Supreme Court Justices & Clerks of Court,

This here Petition for a Writ of Certiorari pertains to a very important Public Interest Matter. Complaints can be easily proven with the now well over eight-hundred (800) pages of critical evidence mostly in the form of contemporaneous emails, notes, & official reports already submitted to the Courts.

Constitutional & Statutory Violations Involved

DOE & NYSUT/UFT Union discriminated against Educator Mr. Perez because of his age, race, gender, national origin, religious affiliation, perceived disability, & intentionally inflicted disability; in violation of the Age Discrimination in Employment Act (ADEA), Title VII of the Civil Rights Act, & Americans with Disabilities Act (ADA). As a result, he was discriminated against with respect to compensation of employment, terms of employment & privileges, & conditions of employment.

Statement of the Case

Violations of The Age Discrimination in Employment Act (ADEA)

It was only after Educator Mr. Perez reached the age of 40 (during school year 2010-2011) that DOE Officers & Business Manager began to look for things to use against him (as mere pretext to their discrimination & goal to slander, harass, & get rid of him) & to discipline him for bogus reasons.

School Year 2009-2010 Email Infiltration:

When discussing budgetary constraints during management meetings DOE Officers openly & adamantly warned educators of the possibility of having to excess/dismiss Senior Educators in order to afford to hire two

(2) inexperienced Educators that cost less & in such way free-up money in the school budget. January 2010 DOE Officer/Assistant Principal/Business Manager Joel Heckethorn of The Amistad Dual Language School underhandedly infiltrated Educator Perez's DOE email account from a computer in main office. The administrator's intrusive infraction was revealed after he accidentally forgot to close Educator Perez's email account & mistakenly sent Educators in the school an email from Perez's email account. When Perez questioned the DOE Business Manager he behaved nervously; stuttered & said he will call Perez back but actually never did. Educator Perez attempted to reach out several more times but was told he was either not in the office or in a meeting. Later, DOE Business Manager emailed all teachers directing them to *"Please delete the email that got sent to you from Luis Perez"*, [email: Heckethorn, Joel. Middle School Report Cards, Thursday, January 07, 2010, 11:55 AM]. Educator Perez reported email intrusion & lack of communication to DOE Officer/Principal Miriam Pedraja. Initially she informed Perez she will look into it & get back to him but never did. Educator Perez attempted to reach out several more times concerning this matter but efforts were met with avoidance, resistance, aggression, & intimidation. Later Perez sent an email to the Amistad community concerning the lack of security in DOE email accounts, [email: Perez, Luis A. RE: Middle School Report Cards, January 10, 2010, 9:55 AM]. When DOE found nothing to hold against him they nefariously began to fabricate complaints. Evidence shows persecution against him intensified as he became older. Educator Perez was discriminated against & treated disparately due to his age also by Officials not paying him the much higher salary he deserved & other were getting in respect to the number of years of experience & amount of education earned, because DOE violated his Employment Seniority Rights, because he is older & thus may pose higher costs to provide health insurance & in order to deny him the security of his retirement pension only weeks prior to his ten (10) year anniversary after which his pension would have been secured for his family.

School Year	Rating	Educator Perez' Age
2006-2007	Satisfactory	36
2007-2008	Satisfactory	37
2008-2009	Satisfactory	38
2009-2010	Satisfactory	39
2010-2011	Satisfactory	40
2011-2012	Satisfactory (but accompanied with threats)	41

2012-2013	Unsatisfactory	42
2013-2014	Unsatisfactory/Ineffective	43
2014-2015	Removed Pending 3020a NYS Charges Filed	44
2015-2016	Nefariously Forged Ratings Sustained	45

The above chart depicts a positive correlation between age & employment ratings; As Educator Mr. Perez became older the adverse conditions to his workplace significantly intensified.

Because of Mr. Perez's age he was threatened & nefariously placed to teach 1st grade; extremely different from grades 7th/8th & from subjects he had taught with favorable performance reviews for over six (6) years. Prior to the inception of 2012-2013 school year Educator Perez was threatened & informed the DOE will do such grade change nefariously & deliberately so he can make mistakes & create cause for DOE to take his teaching license & "blacklist" him from ever teaching. Perez was removed from teaching Middle School & "replaced" with a younger employee whom was kept in said position for several years until she approached tenure year when DOE abruptly dismissed her from working in the school & denied her tenure & due process of law. This same year DOE abruptly did the same to another neighboring tenure-approaching Educator. As publicly reported, teacher tenure has been under attack by DOE Officials in Public Schools. What happened to Educator Perez, these two (2) tenure approaching Educators & many other Educators in this system is clear evidence of such nefarious attacks to aging humans & DOE's complete disregard toward the unconstitutionality of Age Discrimination. Educator Mr. Perez was frequently met with discriminatory slurs; he was told that he looked like he belong teaching in a university as a college professor instead of first grade. Such comments were charged with implications that Educator Mr. Perez was too old to teach at the Amistad Dual Language K-8 Public School. Educator Perez was repeatedly denied his formal requests of "grade level preference" which contractually is based on seniority & was granted to other Educators, (discussed further below).

Violation of the Title VII of the Civil Rights Act

Gross Segregation In The Amistad School:

"Latino/a students are the most isolated of any ethnic group in the United States; Latino/a students attend schools that, on average, are 55 percent Latino/a" – according to several Authors & Professors of Law, [book: Bender, Steven, et al. Paradigm Publishers, Everyday Law for Latinos/as, 2008.] The Supreme Court of the

United States of America unanimously decided that segregation in public schools is unconstitutional, [case: *Brown v. Board of Education*, 1954]. Motivated by racial discrimination through their strict vetting admissions process the DOE effectively engineered & maintained a staggering record of racial disparity in student enrollment in the Amistad Dual Language School in the Inwood section of NYC where Educator Mr. Perez was employed for close to ten (10) years. According to the *University of the State of New York Amistad Dual Language School Comprehensive Educational Plan (CEP) of 2009-2010* figures show between 2006 (school year Perez was officially hired to teach Middle School Eighth Grade Science & Mathematics) & 2009 (school year prior to the inception of the persecutory campaign against Mr. Perez) this school reportedly maintained an average student enrolment rate of three percent (3%) Asian Students, three percent (3%) African American Students, nine percent (9%) White Students & an astounding eighty-five percent (85%) Latino/a Students. Additionally, this NYSCEP report shows that segregation became worse throughout time. On average, the Amistad Dual Language School student enrollment numbers were shockingly thirty percent (30%) more segregated than the fifty-five percent (55%) which Authors & Professors used to describe – “...*the most isolated ...*”, [book: Bender, et al. Paradigm Publishers, *Everyday Law for Latinos/as*, 2008]. Such school enrollment demographics were not even representative of the community which surrounds the school. Judging from DOE's & Union's reactions to legitimate concerns raised about disparate treatment & discrimination you would think you are attempting to perform an exorcism as evil & hate precipitate, progressively intensify, & sheer terror is used to intimidate, repel, & silence complainants. Racially disparate treatment is also evident in DOE's resistance to address, particularly in such immensely segregated school, problems concerning reckless classroom interruptions, the segregation of language by color at the complete disadvantage of Middle School Students, & resistance to address gross lack of basic learning materials such as Spanish Literacy Curriculums, Language Translation Materials, & Textbook Supplies especially for Title I English Language Learners.

Advocating Against Lack of Basic Instructional Materials:

Educator Mr. Perez sent email to DOE Officer/Principal Miriam Pedraja regarding missing of basic instructional materials in both languages for Science which were greatly needed for instruction & according to

DOE were actually ordered the previous school year 2009-2010. Perez was continuously redirected from inquiring about this problem. Principal nefariously directing him to check in a very filthy rodent & roach infested basement stock room. Unfortunately, the much needed Science materials for both languages were not in the basement, [email: Perez, Luis A. Did not find the Science Texts books, September 12, 2010, 10:35 PM]. Prior to this particular school year Perez was reassured by DOE that it is clear to them his class needed the instructional materials & that there was enough money in the budget to order them. In the same email referenced above Mr. Perez reminded the DOE that the computers & printer in his classroom were non-operational. This is an important detail as it connects to a later retaliatory false allegation made against him concerning classroom environment, [email: Perez, Luis A. Did not find the Science Texts books, September 12, 2010, 10:35 PM & Pedraja, Miriam. Untitled Note, Monday, January 31, 2011, 8:46 AM]. It is prudent to mention here that for three (3) consecutive school years, (2010-2011, 2011-2012, & 2012-2013), DOE Officers neglected to provide students with these necessary basic instructional materials they claimed they already ordered despite numerous reminders & attempts to ameliorate the problem from Educator Perez, [email: Perez, Luis A. Did not find the Science Texts books, Sunday, September 12, 2010, 10:35 PM; email: Perez, Luis A. Earth Science Books Never CAME : (, Monday, September 12, 2011, 8:01 AM; email: Perez, Luis A. Science Textbooks, Thursday, June 07, 2012, 9:30 PM]. The following school year 2011-2012 DOE did not just neglect to provide such basic instructional materials but this time they maliciously left many boxes of the wrong books & materials inside of his classroom obstructing student space for several months. Finally, when boxes were removed Perez was informed by DOE Officer/Ass. Principal Olga Ramos & DOE Officer/Principal Zoraida Hernandez they will contact the company, have them pick-up the boxes, & trade them for the right ones. He was told that this should take no more than a week, [email: Perez, Luis A. Science Textbooks, Thursday, June 07, 2012, 9:30 PM]. Mr. Perez's concerns were met with great belittlement, resistance, & aggression.

Advocating Against Gross Interruptions Of Learning

Educator Mr. Perez sent an email to DOE attempting to persuade them to seriously reconsider addressing the large inconsiderable amount of lesson interruptions & distractions, [email: Perez, Luis A. The Attention Span of

a Squirrel, Sunday, January 30, 2011, 1:00 pm]. DOE Officer/Principal Pedraja sent an email from her Verizon Wireless Phone in response to this particular note. Her email reads, *"I will arrange meeting where we can discuss this in person"*, [email: Pedraja, Miriam. RE: From Mr. Perez & Classroom Observations, Monday, January 31, 2011, 8:45 AM]. Exactly one (1) minute later, 8:46 am, Principal Pedraja already replied via DOE email with date of the *"arrange meeting"* along with, **for the very first time ever**, a list of complaints about his classroom environment, [email: Pedraja, Miriam. Untitled Note, Monday, January 31, 2011, 8:46 AM]. Later that evening, (8:54 pm), Educator Mr. Perez replied with an email responding to every single one of the complaints Principal Pedraja listed, [email: Perez, Luis A. RE: Monday, January 31, 2011, 8:54 PM]. Instead of helping to ameliorate the legitimate concerns raised DOE & Union Officials opted to cover-up the infractions, pretend to ignore fact findings, & engaged in a full throttle persecutory campaign against Educator Mr. Perez which included a complete disregard toward the safety & wellbeing of many students & families.

Tenure, Due Process & Statue of Limitation Attacks

2011-2012 Final School Year Teaching Middle School:

The persecution during school year 2011-2012 became so perverse that toward the end of this school year DOE Officer/Principal Pedraja threatened, intimidated, & informed Educator Perez in a shouting & scolding fashion, *"You do not fit here, I do not trust you, I do not want you here anymore."* Principal Pedraja followed by threatening Educator Mr. Perez saying, *"if you return to Amistad, I will put you to teach a very low grade that you know nothing about, you will make mistakes, I will give you an unsatisfactory rating, and I will take your license away"*. Officer/Principal Pedraja said, *"However, I don't want to hurt you so I am willing to recommend you highly to any other school that you apply to, in order to facilitate a smooth transition."* Due to the intensity of the persecution Educator Mr. Perez was forced to surrender to Officer/Principal Pedraja's unreasonable threats & unfair demand for him to leave the school; a place where he dedicated so much time & energy in working with families, students, & colleagues. Out of desperation Perez sent email surrendering to her abuse of power & pleading for an end to the abusive meetings. The email reads, *"Okay, you win. I will look into the market. Just no more meetings."*, [email: Perez, Luis A. Untitled Note, Tuesday, June 12, 2012, 7:41 PM].

Union District Representative Mayra Cruz informed Educator Perez she will talk to Principal & assured him not to worry because she cannot take him out, *“just like that.”* Even though for this school year Educator Mr. Perez had to endure great adversity including but not limited to suffering from immense defamation to his character, he still received a favorable end-of-the-year rating from the Principal. DOE & Union Officers were well aware Educator Mr. Perez intended to return to work in the same school the following school year of 2012-2013 because he was directed to fill out the following official forms: (1) a Declaration of Intent Form on Tuesday, March 27, 2012, (2) a Preference Sheet 2012 on Friday, March 30, 2012, & (3) an End of Year Goal Setting 2011-2012 on Monday, April 30, 2012. Keep in mind that this persecution & intentional infliction of emotional & physical distress was imposed upon Educator Mr. Perez while he was responsible to inspire & facilitate learning for many students. The incessant intentional sabotage of an Educator’s work, students’ learning, & DOE’s refusal to effectively address such problems constitutes Educational Neglect.

2012-2013 School Year Nefariously Reassigned To Teach 1st Grade:

Educator Mr. Perez informed Principal Pedraja that he does not think it was in the cards, meaning that he was not able to find work at a different school & that he will see her in the fall, meaning he will be returning to Amistad, [email: Perez, Luis A. Re: Status, Sunday, August 05, 2012, 8:18 PM]. Later, Mr. Perez sent an email with specifics about why he was unable to find work elsewhere, (he was caring for his sick mother whom was awaiting surgery), [email: Perez, Luis A. Re: Status, Friday, August 31, 2012, 7:26 AM]. At the inception of this school year Educator Mr. Perez reported to the school to work. Principal Pedraja became quite belligerent. Initially she told Educator Perez, *“I don’t know what you are going to do but you have to get out.”* Educator Perez asked for directions but none were provided. Educator Perez asked if he should go to DOE’s Headquarters 65 Court street in Brooklyn to find out what he should do in this situation. She told him, *“Go ahead, I don’t care but you cannot stay.”* Before Educator Perez left the school building DOE Officer/Principal Pedraja reminded him that if she is forced to take him back she will place him in a low grade he knows nothing about, that she will give him an unsatisfactory rating at the end of the school year, & that she will take his license away. Instead of going to Brooklyn Educator Perez went to the Union building in Manhattan. He was

encouraged by Union District Representative to return to the school because he is tenure, he did nothing wrong, & because that is where he belongs. Union District Representative assured Educator Perez that she will talk to Principal Pedraja about this matter. When Educator Perez returned to the school the Principal assigned him to staple papers together & to clean & arrange shelves in the main office in the first floor in front of students, parents, colleagues, & visitors. Later she expressed to Perez, *"I am going to assign you to work in the 4th floor because there is a lot of confidential things that happen here and we cannot trust you."* In the 4th floor Perez was assigned to help put the library together which was still under construction. He was moving heavy, dusty, soiled boxes & had to shelve books. He was nefariously assigned jobs to do in front of everyone in order to humiliate him until Friday, October 19, 2012 when DOE Officer/Principal Pedraja made good on her threats. After teaching Middle School Science & Mathematics for over 6 years in the 4th floor Educator Perez was nefariously reassigned to a different floor to teach a grade (first grade) & content areas that he never taught before such as Social Studies, Reading, & Writing. Educator Perez was given such reassignments despite being tenure & having seniority over new teachers that were assigned to teach grade levels closer to the grades he is experienced teaching & which he had requested several times on formal *"Preference Forms"*. Additionally, a well seasoned first grade Educator, Karin Nieves, who happened to be the first grade student's kindergarten Educator the previous school year & shared mutual familiarity & rapport with students, families, & colleagues, was abruptly displaced at the end of October 2012. Specifically, on Friday, October 19, 2012, (well into the start of the school year) Educator Perez was nefariously directed by DOE to observe Educator Karin Nieves teach her first grade class for the last time & on Monday October 22, 2012 Educator Perez was directed to take over her class by himself for the rest of the school year. At the end of this school year Mr. Perez was provided the unsatisfactory rating DOE had promised him prior to the start of the school year.

A year later, October 21, 2013, a hearing concerning this rating was finally held but nefariously mishandled by Chancellor's Office & Union. The verdict to this investigation & hearing was nefariously suppressed in order to exceed Perez's statute of limitation to appeal their verdict.

Educator Perez was treated disparately & with Judicial Misconduct & Union Representation Misconduct, (material exclusion & misrepresentation, subornation of perjury, obstruction of justice), by DOE/Hearing Officer/Arbitrator/Chancellor Committee Chairperson Ms. Toby Ratz & by Union Official Mr. Albert Sarasohn DOE Chancellor Dennis Walcott, DOE Senior Deputy Chancellor, Chief Academic Officer, & President of Bank Street College of Education Shael Polakow-Suransky, & Chancellor Carmen Farina during this unfair & nefarious “*unsatisfactory rating*” forged & riddled with allegations easily proven to be false. They blatantly ignored critical fact findings, deliberately obstructed justice, & engaged in other abuses, [*Perez, Luis A. Transcript & Annotations of The New York City Department of Education School Chancellor’s Office of Appeals & Review In the Matter of Immoral & Unethical Life Changing Unfavorable Ratings, November 2013: thirty-eight (38) pages*]. As referenced in Perez’s complaint & proven by all the evidence he submitted to the Courts DOE & Union Officers – nefariously refused to provide Educator Mr. Perez (and instead kept secret) the verdict to the investigation & hearing of the infamous fabricated “unsatisfactory” rating for school year 2012-2013 which they supported with reports obviously riddled with falsehoods, flaws, & discrepancies while nefariously electing to ignore opposing fact-findings including those provided by Perez. As a result, to this nefarious obstruction of justice & cover-up Educator Mr. Perez electronically mailed staff & administrators only a letter depicting such judicial derailment by DOE & Union “*leaders*” where he also announced that he will go on a hunger strike during the midwinter recess of 2014 in order to raise awareness to such rampant abuse of power. [*see electronic mail sent to staff & administrators only; Perez, Luis A. The Elephants In Our Rooms, February, 07, 2014: four (4) pages*]. In retaliation, DOE Officer/Principal Zoraida Hernandez, Officer/Superintendent Elsa Nunez, & Officer/Superintendent Manuel Ramirez, with the coordination of the Union, intentionally inflicted even more emotional & physical distress upon Educator Mr. Perez by nefariously drafting & disseminating to all Educators, Students, & Families defaming memos depicting Educator Perez as unstable & a dangerous threat to the school & soon pulled him out of the classroom.

Approximately four-hundred-and-one (401) days after the hearing was held Educator Mr. Perez finally was provided the verdict to this fraudulent & nefarious rating. Turns out that DOE/Hearing Officer Chancellor

Chairperson Ms. Toby Ratz & Senior Deputy Chancellor, Chief Academic Officer & President of Bank Street College of Education Mr. Shael Polakkow-Suransky ruled against Educator Perez & in favor of themselves (the DOE). Evidence shows that on December 02, 2013 DOE Labor Support Unit Consultant & Team Leader Dr. Linda Carol Palumbo (of the Office of Labor Relations) emailed Principal the following message, “*See email below! Congrats!!! :)*”, with the accompanied happy face emoticon. By the time Perez received the verdict to such hearing he had exceeded his right to appeal the DOE’s irrational verdict. Evidence shows this was clearly DOE’s intended purpose. Similar suppression of critical evidence was demonstrated by DOE & Union Officials while handling the nefarious NYS 3020a investigation & hearing which will be discussed further below. Important Note: Bank Street College is known as the training hub for school administrators & is the college where Chancellor Carmen Farina reportedly taught as an adjunct professor & where Principal Miriam Pedraja attended her administration training,

[email sent to Union Attorney Michael Del Piano; Perez, Luis A. 401 Days Later I Learn About the Verdict of a “U” Rating Appeal Held on October 21, 2013 By the Department of Education Chancellor’s Chairperson, November 30, 2014: two (2) pages; email sent to DOE personnel; Perez Luis A. The Elephants In Our Rooms, February 07, 2014: three (3) pages. The numerous “verdict follow-up” emails sent to DOE & Union that were either ignored or responded to with “I don’t know[s]”; the packet sent to District Court: Perez Luis A. Transcript & Some Annotations of More Nefarious & Discriminatory Ratings & Procedures Perpetrated By DOE Officials In Charge of Our Public School Students & Educators, March 16, 2017].

Educator Mr. Perez was threatened, intimidated, & informed, (prior to the inception of school year 2012-2013 & after so many years of teaching Middle School Science & Mathematics), that he will be assigned to teach a low grade he knows nothing about – as an explicit & deliberate plan to force him to make mistakes to create reason to confiscate his teaching license & terminate his employment. DOE followed through with this threat & eventually Mr. Perez was forced out of the school system weeks prior to his employment anniversary which would have secured his pension benefits for his family.

2013-2014 School Year Nefariously Reassigned to Teach 4th Grade:

Union District Representative Mayra Cruz attempted to console Educator Perez arguing that DOE Officer/Principal Miriam Pedraja is now retired & because of that, “*all the persecution is now over*”. Educator Perez argued the persecution is not over because Principal Pedraja’s Former Assistant Principal Zoraida

Hernandez had been promoted to Principal & her former Technology Educator/Dean of School has been promoted to Assistant Principal of the same school; both of which played key roles in the persecutory campaign against him. Union Representative refused to talk about anything that happened in the past. Instead argued that Perez should just “*move forward*” & give them a chance because sometimes assistants act a certain way only because they are following orders from the principal but when they become principal themselves they run the school completely different. Union assured Educator Perez that she has witnessed this many times in the years she had worked as District Representative. Due to the fact that DOE Officer/Principal Zoraida Hernandez & DOE Officer/Assistant Principal Olga Ramos have demonstrated to be far too invested in destroying Educator Perez’s reputation & career he was certain that they were not going to end the persecutory campaign. Nevertheless, he agreed to give them both a chance. Unfortunately, it was evident from very early & throughout this school year that both DOE Officers were vehemently continuing to treat Educator Perez disparately, continued their persecutory campaign, & continued to sabotage his classroom instruction & student learning. It was also evident DOE had full support from Union, DOE Chancellors, Legal Counsels, Arbitrators, & others.

Despite electing on his formal grade “*Preference Form*” to teach either 1st grade again the following year (in order to attain greater experience teaching such grade) or 6th grade (which is closer to the 7th & 8th grades which he earned much experience working with) DOE nefariously assigned Perez to teach 4th grade because they were aware that Educator Perez had no experience teaching this particular grade & because this was a testing grade for many more New York State Examinations teachers will be rated against as opposed to other grades.

2014-2015 Reassignment to 5th Grade Abruptly Interrupted by Nefarious NYS 3020a Charges Filed:

Educator Perez was assigned to teach fifth (5th) grade this school year but after attending the first in-house “*Professional Development*”, after setting up heavy furniture & classroom for students (many of which he worked with in previous school year) & after meeting parents & students for several days, on September 08, 2014 Educator Perez was abruptly removed from the classroom & served New York State 3020a charges by DOE Officers Principal Hernandez & Ass. Principal Ramos after he dismissed his students for the day. Educator Perez’s students were stuck with Substitute Educator for the entire school year & Perez kept grossly

isolated in small windowless filthy storage “*rubber room*” in the same school building for the entire school year. Many families removed their children from the school & many students exhibited a spike in emotional & behavioral struggles.

The DOE & Union were so confident they can get away with discrimination, harassment, & corruption that even on the record & under oath their testimonies were riddled with nefarious lies to intentionally suppress critical fact findings, derail investigations, & obstruct justice. Officials were immensely confident that no one in authority will ever actually weigh in or question their nefarious, corrupt, & unconstitutional conduct or in any way hold them accountable & promote justice in our schools.

DOE Officials & Attorneys nefariously & blatantly lied under oath, resisted to testify about & resisted to provide into evidence the New York State & Local Measure scores & ratings (which were based on evidence of student growth) for Educator Mr. Perez’s performance for school year 2013-2014. Such important scores & measures which actually deemed Educator Mr. Perez as an EFFECTIVE Educator – completely contradicts the DOE Officers/Principals’ ratings of Educator Mr. Perez & completely contradicts the foundation of DOE’s nefarious NYS 3020a charges filed against him, (3020a Hearing Dates: Thursday, January 08, 2015, Tuesday, April 21, 2015, Tuesday, April 28, 2015, Wednesday, April 29, 2015, Thursday, May 07, 2015, Friday, May 15, 2015, Thursday, May 21, 2015). In order to appreciate the gravity of corruption, evil, & abuse of power in the filing of this NYS 3020a changes you must read the following jaw dropping *reports* already in Court evidence.

The first one on the list below is enclosed with this here writ as Appendix A,

[“APPENDIX A” ENCLOSED – Re: NYS 3020a; Perez, Luis A. Devil Is In The Details: Subornation of Perjury Part 2, March 2017: 39 pages.]

Equally important to Read:

[Re: NYS 3020a; Perez, Luis A. Love to Learn (Video), &/or Perez, Luis A. Subornation of Perjury, (Report), December 22, 2015: twelve (12) pages. Re: “U” Rating hearing; Perez, Luis A. Transcript & Annotations of The New York City Department of Education School Chancellor’s Office of Appeals & Review In the Matter of Immoral & Unethical Life Changing Unfavorable Ratings, November 2013: thirty-eight (38) pages. Re: “U” Rating hearing in packet sent to District Court; Perez Luis A. Transcript & Some Annotations of More Nefarious & Discriminatory Ratings & Procedures Perpetrated By DOE Officials In Charge of Our Public School Students & Educators, March 16, 2017. Re: Electronic mail sent to Union Attorney Michael Del Piano; Perez, Luis A. 401 Days Later I Learn About the Verdict of a “U” Rating Appeal Held on October 21, 2013 By the Department of Education Chancellor’s Chairperson, November 30, 2014: two (2) pages. Re: Electronic mail sent to DOE & Union

Personnel Only; Perez Luis A. The Elephants In Our Rooms, February 07, 2014: three (3) pages. Re: Electronic mail sent to Union Attorneys Jennifer Hogan, Michael Del Piano, & New York State Union General Counsel Richard E. Casagrande shortly after Perez's initial conference with Union Attorney Hogan shortly before the 3020a Hearing actually began; Perez, Luis A. The Handling of the 3020a Charges Filed for Alleged Incompetence, April 18, 2015: six (6) pages.] Re: Electronic mail & phone calls of the numerous "verdict follow-up" requests sent to DOE & Union Officials that were either ignored or responded to with "I don't know[s]". Re: Electronic mail to DOE & Union Officials; Perez, Luis A. Action Plan, February 10, 2013 & October 17, 2013: one (1) page. Perez, Luis A. Rebuttal to "Formal Observation" and "Plan of Action", February 28, 2013: six (6) pages.]

2015-2016 School Year New York State 3020a Verdict Delivered & Perez Unlawfully Forced Out:

For the first three (3) months of this particular school year Educator Mr. Perez was kept grossly isolated in the same small windowless filthy storage "rubber room" in the same school building until November 23, 2015 when DOE & Union once **again nefariously & unlawfully ruled in favor of themselves** & Educator Mr. Perez was forced out of the school system,

[Williams, Richard D. Esq. OPION AND ORDER UNIVERSITY OF THE STATE OF NEW YORK STATE EDUCATION DEPARTMENT IN THE MATTER OF THE CHARGES PREFERRED BY DEPARTMENT OF EDUCATION the City of New York v. Luis Angel Perez, FILE No. 25823, November 23, 2015: sixty-seven (67) pages; Hogan, Jennifer A. & Casagrande, Richard E. NEW YORK STATE UNITED TEACHERS UNION (Affiliated with AFT, NEA, AFL-CIO) DEPARTMENT OF EDUCATION the City of New York v. Luis Angel Perez, No. 258619-T248, November 24, 2015: two (2) pages.]

Although not mentioned in the NYS 3020a verdict report the DOE & Union nefariously abruptly canceled without proper notification Educator Mr. Perez's medical coverage at a very critical moment of medical treatment. He found out of the nefarious cancellation on January 09, 2016 as he attended a prescheduled medical appointment but was rejected on arrival in the midst of receiving critical medical treatment & with critical examinations pending. Educator Perez was informed that he cannot be seen because his employer had cancelled his insurance as of December 01, 2015 & had not covered the expenses for medical treatment received for the month of December. On several occasions during January 2016 Educator Perez pleaded for District Court Judge Loretta A. Preska to issue an injunction to order the DOE to reinstate his much needed medical coverage but unfortunately such requests were ignored & thus denied, (similar to how Perez's repeated requests to the Courts for legal representation were deliberately ignored, lied about, & covered-up; discussed bellow). Additionally, although not mentioned in the NYS 3020a verdict report, the DOE & Union nefariously denied Educator Perez the raises for the years which DOE Officers in bad faith rated him poorly & which they

ignored complaints of disparate treatment, harassment, & abuse of power. He was denied retroactive compensation for years that all teachers were working without a contract between the Union & the DOE. Other Educators received portions of this five (5) year “*lump-sum*” payment except Educator Perez. Educator Perez was denied appropriate salary adjustments (Salary-Step Placement & Salary Differentials) after successfully completing a Masters in Science Bilingual Education & all other relevant New York State Certifications. DOE nefariously argued that they could not find proof that he had graduate from the Masters Degree Program of the City University of New York (CUNY) or completed the NYS certifications even though evidence shows that CUNY did send the DOE my Official transcript after completion of program & even though the New York State also notified DOE of all Perez’s completed State Certifications. Additionally, Educator Perez was denied the raises for the school years which he was targeted, discriminated, harassed, & nefariously given poor ratings & evaluations that were baseless, unlawful, & contradictory to the scores & ratings provided by State & Local Measures both of which deemed Educator Mr. Perez an “*EFFECTIVE*” educator for the same school year.

[see the following already in Court evidence: correspondence sent to Judge Loretta A. Preska; Perez, Luis A. More Evidence & Request to Order DOE to Restore Medical Coverage, January 21, 2016 & electronic mail sent to DOE & Court; Perez, Luis A. Suspended Medical Coverage, January 20, 2016.]

Racially disparate treatment is also evident in DOE’s Disciplinary Actions Imposed Upon Both Students & Educators such as referring to students of color as “*repeated offenders*”, repeatedly shouting at them to “*get-up against the wall*”, threatening them with police for minor behavior infractions, disparate abusive punitive tribunal-like protocol imposed to meet with families to address student behavior, disparate protocol to address families of color that chose to “*opt-out*” of the testing frenzy, the DOE boasting over classroom management strategy which consisted of training students to immediately freeze in a standing position with legs spread open with hands interlaced & locked on top of head at the mere switching off the lights – all in one of the most segregated schools in New York City.

Motivated by discriminatory intent, his Latino background, & his persistent advocacy in favor of some of the most segregated Students & Educators in New York City, the DOE & Union had taken adverse action against Perez & treated him, & others, as if Latinos/as are inferior & not worthy of improvements, fairness, & equal

protection of the law. Educator Mr. Perez felt immensely segregated & discriminated in the DOE. Discriminatory responses from the DOE did not just alter the conditions of his employment but also adversely affected his salary, career, financial security, reputation, personal health, & that of his family.

It has been publicly reported that teacher tenure & due process of law are under unprecedented attack by DOE, special interest groups, the media, & even State Courts as a pretext to redirect from having to address the well founded connection between low academic achievement & poverty. Tenure laws were put in place in order to protect Educators from the kind of favoritism that leads to the hiring of mostly relatives & friends (nepotism) known to obstruct accountability & to make sure that the education that students receive is not asphyxiated by oppressive political agendas, illogical administrative decisions, corruption, & other abuses of power. Despite his tenure status for three (3) years in a row DOE failed to provide Perez with the positions he requested even though said positions existed & Perez qualified to teach in such positions.

Educator Mr. Perez was continuously treated disparately when formally & informally observed & rated by DOE Officers/Principals Miriam Pedraja, Zoraida Hernandez, & Olga Ramos, when provided with memos, when provided with summonses, when disciplined, when called on the loud-speaker excessively, when he raised safety, programming, & equality issue concerns.

[Electronic mail to DOE & Union officials; Perez, Luis A. Action Plan, February 10, 2013 & October 17, 2013: one (1) page. Perez, Luis A. Rebuttal to "Formal Observation" and "Plan of Action", February 28, 2013: six (6) pages. Perez, Luis A. Transcript & Annotations of The New York City Department of Education School Chancellor's Office of Appeals & Review In the Matter of Immoral & Unethical Life Changing Unfavorable Ratings, November 2013: thirty-eight (38) pages. Perez, Luis A. Devil Is In The Details: Subornation of Perjury Part 2, March 2017: 39 pages.]

Educator Mr. Perez was treated disparately & with Official misconduct & Union Representation Misconduct (material exclusion & misrepresentation, subornation of perjury, obstruction of justice), by District Representative Mayra Cruz, Borough Representative Evelyn De Jesus, President Michael Mulgrew, Political Action Representative Marquis A. Harrison, & Representative Winston Silvera, DOE Officers/Principals Miriam Pedraja, Zoraida Hernandez, Olga Ramos, & DOE Officer/Dean & Union Representative Victor Negrón, (*notice the conflict of interest in the underlined titles of the latter*). DOE's sabotage of Perez's due process & statute of limitations was also evident in their nefarious & incessant resistance to share with their own

colleagues & Union Attorneys (whom occupied offices in the same building just one floor away) important documents & information essential to a fair investigation & critical to Perez's defense, Union's incessant & nefarious resistance to file & fairly investigate Perez's legitimate complaints, & in the grossly ambiguous nonfriendly & disparate manner in which DOE & Union unrolled the New York State 3020a charges (& other nefarious hearings) against Educator Mr. Perez.

[Electronic mail sent to Union Attorneys Jennifer Hogan, Michael Del Piano, & New York State Union General Counsel Richard E. Casagrande shortly after Perez's initial conference with Union Attorney Hogan; Perez, Luis A. The Handling of the 3020a Charges Filed for Alleged Incompetence, April 18, 2015: six (6) pages.]

After the 3020a prehearing conference of January 08, 2015 the DOE legal team was abruptly changed from Hearing Officer James Conlon & Attorney Rishona Fleishman to Hearing Officer Richard D. Williams, Attorney Ms. Shareema Abel, Attorney Ms. Jade Fuller, & Attorney Mr. Mike Saint-Pre. During this time the Union's Legal Counsel was also changed from Attorney Michael Del Piano to Attorney Jennifer Hogan both from the Law Office of General Counsel Richard E. Casagrande. With only a week notice the entire hearing schedule was abruptly changed from announcing that Perez's 3020a hearing is unequivocally scheduled to start no earlier than a year from the prehearing conference to a last minute rush to start approximately three (3) months from the prehearing conference of January 08, 2015.

Educator Mr. Perez was treated disparately & with Attorney Misconduct (material exclusion & misrepresentation, subornation of perjury, obstruction of justice) by Union Attorney Jennifer Hogan & DOE Attorneys Ms. Shareema Abel & Ms. Jade Fuller & by NYSDOE 3020a Hearing Officer/Arbitrator Richard D. Williams; (3020a Hearing Dates: Tuesday, April 21, 2015, Tuesday, April 28, 2015, Wednesday, April 29, 2015, Thursday, May 07, 2015, Friday, May 15, 2015, Thursday, May 21, 2015).

Mr. Perez was denied access to his former students' 4th grader New York State Examination Scores which he was being judged against in this nefarious 3020a charges. He was denied access to his Amistad school email account which contained many lessons & important email communications which weakens the DOE's case against him. Officials would periodically ransack his classroom when he was not present; moving things

around, making a mess, & completely removing documents from the classroom. One time five (5) of his first grade student's report cards in DOE custody went mysteriously missing. During school year 2014-2015 Educator Perez purchased & wrapped holiday gifts for the fifth grade students & teachers but such gifts were nefariously confiscated from students by DOE Officer/Ass. Principal Ramos & never returned to students or to Educator Perez. He was treated disparately because of his Urbiculture, familiarity with youth slang & culture & because he is able to speak with an urban vernacular. Perez was unlawfully ordered to "*suffer*" a suspension without pay & removed from payroll which caused further damage to his credit & other living conditions.

Educator Mr. Perez was retaliated against for opposing practices & for reporting practices (whistle-blowing) that directly contribute to a hostile work/learning environment & which directly discriminate against elementary & middle school age, predominantly low income, Title I, Latino, Spanish speaking, Urbiculture, "*immigrant*" students whom because of their age, race, natural origin, social economic status, residency status, & urban culture, are continuously oppressed & intimidated into silence. Opposing practices such as, but not limited to, the segregation of language by color, excessive disruption of classroom lessons, depriving Students & Educator form basic instructional materials, & the like. Additionally, he was disciplined nefariously & falsely accused of sexual impropriety by DOE Officer/Principal Miriam Pedraja & DOE Officer/Ass. Principal Olga Ramos.

Attempts to sabotage Perez's due process & statute of limitations in favor of the DOE & Union was also evident in the handlings of his complaints by the "*Equal*" Employment Opportunity Commission (EEOC), the District Court, & the Court of Appeals which will be discussed further toward the end of this here writ.

He was forced to suffer the embarrassment & stress of having a DOE Representative scotch-tape to his apartment door entire packet of NYS 3020a charges against him despite there being sufficient room to slip packet under the door. The complaint was taped to his door & was not secured in an envelope. Instead, it was available for anyone that passed by his door to thumb through the documents. What is worse, the front page contained his Social Security Number, full name, name & address of the school, & more, (September 13, 2014).

April 2015 there was an abrupt, mysterious, & unprecedented influx of surveillance cameras installed, especially around Educator Perez's living quarters. Just walking from his first floor door to the front of the

building there are approximately eight (8) surveillance cameras. Educator Perez attempted to reach out to landlord Y. Moshe Singer, MCS Properties, on several occasions, concerning this strange & abrupt change but was repeatedly ignored. Long time resident Mr. Perez requested for the Courts to investigate if there is any relationship between his landlord, whom he was forced to sue in Housing Court in late 2011 (which was also around the inception of the Discrimination & Harassment campaign against him) & Associate Counsel of the DOE Office of Legal Services Robin Singer. Such request was also ignored. Educator Mr. Perez's window was vandalized on two separate occasions. Despite his complaint the window remained vandalized & landlord staff claimed they checked the surveillance footage but found nothing.

Educator Perez was the only one in the Amistad School that was nefariously denied a check on February 14, 2014 & was forced to wait to get his check after the mid-winter recess; Monday, February 24, 2014.

Summer of 2015 Educator Perez was informed by a financial “*payday lending*” institution in Florida named “*AMSCOT*” that a pay-check issued by the DOE which he cashed the previous summer of 2014 had bounced, that the DOE had not reimbursed them for the bounced check & that Mr. Perez is responsible for paying for the bounced check. Educator Mr. Perez felt embarrassed & was treated as if he was involved in check-fraud.

More Educational Oppression

DOE & CUNY Officials deprived Educator Mr. Perez from furthering his education. They nefariously sabotaged his efforts to return to graduate school to attain a PhD in Educational Psychology from the school where he had successfully earned a Bachelor Degree in Psychology & Human Behavior, a Masters Degree of Science Bilingual Education, & letters of endorsement for the PhD Program from reputable Professors.

[Electronic mail replies received by Educator Mr. Perez from reputable Graduate Professors of CCNY, Doctors, & Leaders indicating a zeal & willingness to endorse Educator Perez in applying for the CCNY Educational Psychology PhD program; Perez, Luis A. Luis Perez Graduate Student, September 25, 2011: two (2) pages, & Perez, Luis A. Luis Perez Your Grad Student, September 29, 2011: one (1) page. Electronic mail sent to CUNY Director of Graduate Admissions Les Gribben; Perez, Luis A. Graduate Application, January 28, 2012: two (2) pages. Electronic mail sent to CUNY Director of Graduate Admissions Les Gribben; Perez, Luis A. The Graduate Center / Office of Admissions, March 07, 2012: one (1) page. Electronic mail chain between Educator Perez, CUNY Director of Graduate Admissions Les Gribben, & CUNY Graduate Center Executive Officer Mario Antonio Kelly; Perez, Luis A. The Graduate Center / Office of Admissions, between March 06, 2012 & April 24, 2012: four (4) pages. Electronic mail sent & USPS Special Mailed to President of CUNY Graduate Center, William P. Kelly & CUNY Office of the Chancellor Mathew Goldstein; Perez, Luis A. PhD Applicant Complaint, August 20, 2012: four (4) pages. Electronic mail sent to President of CUNY Graduate Center William P. Kelly & CUNY Office of the Chancellor Mathew Goldstein; Perez, Luis A. PhD Applicant Complaint Important, August 27, 2017: three (3) pages. Report submitted to the Courts; Perez, Luis A. CCNY Block, 2012: two (2) pages.]

Mr. Perez was teased, made fun-of & openly embarrassed for always carrying with him a bag of personal items while female staff were never questioned & or bothered about carrying their bags of personal items & because of his weight.

Educator Mr. Perez's Tenure, Due Process, & Statue of Limitations were nefariously sabotaged in order to force his complaints outside of the statue of limitations & in such way allow Defendants to operate way above the law & way below human decency & in order to shield them from being held liable for engaging in immoral, unethical, & unconditional practices. Educator Mr. Perez was repeatedly led to believe that officials will eventually, in good faith, resolve or at least ameliorate the adverse working conditions imposed upon him by Defendants. Educator Perez did not imagine that he would be forced to petition his Government for a redress to such grievances.

Mr. Perez was repeatedly subjected to intentional infliction of emotional & physical distress by Defendants. As a result, in such extraordinary way, Perez was prevented from exercising his right to file his complaint in Court & EEOC earlier in time & explicitly *"which would trigger equitable tolling"* because *"despite reasonable care and diligent efforts"* Educator Mr. Perez *"did not discover the injury until after the limitation period expired"* & trigger the *"continuing violation doctrine"* because Educator Mr. Perez apparently suffered *"from recurring acts of abusive conduct"* & thus was *"unable to recognize the true character and enormity of the discriminatory harassment until after it has continued for ..."*, as evidence shows, a long period of time.

Violations of Americans with Disabilities Act (ADA)

In order to avoid even further discrimination Educator Mr. Perez intended to exercise the legal right to preserve his personal medical privacy by keeping such information off of the public record. However, it has become increasingly clear that in doing so – his claim of discrimination especially under the Americans with Disabilities Act may be dismissed by the Courts. Consequently, he will at least partially reveal the medical conditions which resulted from DOE's & Union's incessant abuse.

Educator Mr. Perez's workplace was saturated with hostility, discriminatory intimidation, ridicule, & insults to a level immensely severe & pervasive, as clearly referenced & proven by his complaints, correspondences, &

in the now well over eight-hundred (800) pages of evidence, mostly in the form of contemporaneous electronic mail, notes, official reports, affidavits, & the like. The never-ending gross intentional infliction of emotional & physical distress nefariously imposed upon him directly resulted in Educator Mr. Perez's health decline & Clinical Diagnosis of Worsening Major Depression & Post Traumatic Stress Disorder (PTSD). Such conditions required him to undergo chemical interventions which resulted in even further impairment to the functioning of his brain, mind, & health. Medical documentations are available upon request.

DOE & Union Officials were well aware that Educator Mr. Perez was having an adverse reaction as a result of their continued persecution & discrimination & that he was undergoing medical treatment for such adverse reaction. The DOE's & Union's knowledge of Perez's adverse reaction can be easily proven with the following: (1) copies of periodic medical itemized receipts mailed to Perez by the *Union/DOE's Employee Member Medical Benefit Fund* which contained medical information such as dates, names/positions of doctors & names of medications used in treatment, (2) telephone transcripts of times pharmacists had to contact such entity in order to address problems impeding needed medical coverage, (3) electronic mail, fax transmittal receipts & telephone transcripts showing that Educator Perez had forwarded his medical information specifically to the Amistad Dual Language School Administrators & to the DOE Headquarters during his filing of a *Request for Leave under the Family and Medical Leave Act (FMLA)* approved October 08, 2014, (4) the numerous medical documents Educator Perez provided to the *DOE Human Resource Medical Department* as well as notes which said Department generated after Perez was nefariously harassed with being forced to undergo unwanted, unwarranted, & excessive medical services from DOE, & (6) from the result/report of the nefarious investigations imposed upon him by *New York City Special Commission of Investigations (NYCSI)* whom bombarded him after he was discharged from the hospital for a school related illness, (mentioned above).

The reasonable accommodations that Educator Mr. Perez needed in order to perform his job optimally & in order to preserve his mental & physical health was for the DOE & Union to simply put an end to the incessant harassment, persecution, discrimination, & intentional infliction of emotional & physical distress imposed upon him. However, evidence shows that DOE & Union instead opted to refuse to make

such reasonable accommodations, even at the expense of Students' safety, well being, & education. To make matters worse – DOE & Union elected to nefariously abruptly cancel without proper notification Educator Perez's medical coverage at a very critical moment of treatment. Educator Perez found out of the cancellation on January 09, 2016 as he attended a prescheduled medical appointment but was rejected on arrival in the midst of receiving critical medical treatment & with critical clinical examinations pending. He was informed that he cannot be seen because his employer had cancelled his insurance as of December 01, 2015 & had not covered the expenses for medical treatment received for the month of December of 2015. On several occasions during January 2016 Educator Mr. Perez pleaded for the District Court to issue an injunction to order the DOE to reinstate his much needed medical coverage but unfortunately such requests were ignored & thus denied, (similar to how his repeated requests for legal representation were ignored by the Courts & later lied about with attempts to cover it up).

[see the following already in Court evidence: correspondence sent to Judge Loretta A. Preska; Perez, Luis A. More Evidence & Request to Order DOE to Restore Medical Coverage, January 21, 2016 & electronic mail sent to DOE & Court; Perez, Luis A. Suspended Medical Coverage, January 20, 2016.]

Educator Mr. Perez suffered an adverse employment action which directly led to physical & mental impairment which has substantially limited his ability to engage in major life activities. Perez's mind & body does not work the same as a result of the incessant abuse he was forced to endure. Educator Mr. Perez whom enjoyed spending time with family & friends, shopping, going to the movies, eating out, learning, nature, sports, the outdoors, driving a vehicle, cooking, interacting with people, & the like – has been impaired to the extent of not being able to do any of these & to the extent of not being able to exit his apartment for over two (2) years thus far; since he was forced outside of the DOE November 24, 2015 & his career & reputation completely tarnished. Educator Mr. Perez spends most of his time isolated from the world, even from his own family, in a locked room. **The DOE & Union must be held accountable in a way as to discourage them from causing similar harm onto others, especially Students, Families, & Educators under their authority.**

In direct retaliation for taking a *Leave under the Family & Medical Leave Act (FMLA)* Perez was discriminated against & treated disparately after his return to work for damages directly imposed by DOE's &

Union's intentional infliction of emotional & physical distress. He was denied the first & only emergency check he ever requested from DOE after he was nefariously lied to & denied his regular paycheck & after he was nefariously lied to by the Human Resource Director that he will receive two (2) checks the following pay period but then learned his second paycheck of the month also did not arrive. DOE retaliated against Educator Mr. Perez by nefariously botching his medical leave "time-keeping" & payroll status. Electronic mail chains between administrators prove that even though Mr. Perez returned to work on time & ample notifications were provided to Human Resource Directors Ms. Danette Gooden & Mr. Charles Peebles, about this & other salary discrepancies imposed & in order to prevent such problems – DOE still nefariously lied & removed Educator Perez from payroll. This caused him greater stress & damage to his credit score as he was unable to make car payments & pay for other important bills.

[see electronic mail chain between payroll secretary Maldonado & HR Director Gooden, PLEASE RESPOND WITH A SOLUTION, Importance: High, January 20, 2015: eight (8) pages. Electronic mail sent to Superintendant Manuel Ramirez, Chancellor Carmen Farina, & multiple other DOE & Union Officials – including HR Directors Danette Gooden & Charles Peebles; Perez, Luis A. Salary Step Scam?, February 01, 2015: four (4) pages]

DOE also discriminated against & treated him with disparity after Perez endured a hospitalization in January 2013 after weeks of suffering from a school related illness which DOE Officials knew several students in his classroom had previously contracted & which resulted in their absences as well. After Educator Mr. Perez was discharged from the hospital & cleared to return to work by several different Doctors DOE Officials retaliated against him by nefariously filing a false claim alleging Educator Mr. Perez – (1) falsified his medical records, (2) was never truly hospitalized but instead took a trip to Puerto Rico, & (3) by ordering New York City Special Commissioner of Investigation (NYCSCI) Detectives Joseph Piwowarski & his colleague to visit the Amistad Dual Language School & pull Educator Mr. Perez out from the middle of teaching a lesson to his students in order to interrogate him in the Principal's Office, (absent the Principal &/or Union Representation), concerning these DOE allegations. Eventually, NYCSCI Detectives claimed that they had already visited & communicated with Educator Mr. Perez's Doctors in order to confirm the authenticity of his medical documents & claimed that

they only needed to have a “*face to face*” meeting with him in order to confirm who he is & in order to close the case. Detectives asked Educator Perez why he thought the Principal would do that to him.

Educator Mr. Perez was repeatedly coerced by different DOE & Union Officials to believe that his complaints were being taken seriously, his complaints were being fairly addressed, that the hostile & adverse working conditions will improve, & that there is no reason to seek for justice outside of the DOE. As a result, Perez really had no choice but to trust that the adverse conditions in his workplace would be handled internally. Evidence shows such repeated nefariously deceptive false assurances were mere pretext to Defendant’s plot to stall & in such way disrupt Perez’s potential to redress such grievances before the Honor of a real Court by calculatingly & nefariously forcing said complaints outside the statute of limitation.

[see letter sent to Union which speaks of the pervasiveness & severity of harassment & the request made by him for Union to assist him in bringing suit against the DOE before an impartial judge in a real Court: Perez Luis A. Important From Luis Angel Perez From Amistad & Important Public Education Problem, September 13, 2014: four (4) pages. Perez Luis A. Reference List of Formal Complaints: Formal Complaints Made to Officers of the United Federation of Teachers (UFT) Union Concerning Abuse of Power, Legal Infractions, & Persecution Perpetrated by Department of Education / Board of Education Public School Officials, August 2013: three (3) pages]

As a result, in such extraordinary way Perez was prevented from exercising his right to file his complaint in Court & EEOC, earlier in time & explicitly, “*which would trigger equitable tolling*” because “*despite reasonable care and diligent efforts*” he “*did not discover the injury until after the limitation period expired*” which would also trigger the “*continuing violation doctrine*” because Educator Perez apparently suffered “*from recurring acts of abusive conduct*” & thus was “*unable to recognize the true character and enormity of the discriminatory harassment until after it has continued for ...*” a long period of time. Note: Educator Perez learned of the existence of these terms through the Courts.

Additionally, Educator Mr. Perez was discriminated against by DOE Officials as he was made fun-of, embarrassed & treated as if he suffers from a “*perceived disability*” for merely having an introverted/cerebral type personality. He was often met with slurs such as, “*you don’t belong*” because of DOE’s “*perceived disability*” & he was nefariously isolated from his colleagues (which consisted of mostly female Educators) through slander, direct intimidation, & threats to those who think about supporting him.

Relief Statement

Educator Mr. Perez Prays That The Honor Of The Courts Justly Grants Him Such Relief As May Be Appropriate Including But Not Limited To The Following:

(1) Reimbursement Of All Union Dues Ever Deducted From His Paycheck.

(2) All Monies Owed To Him Plus Interest & To Be Made Whole In All Ways. For example:

A. What They Owe Him From The Time He Earned A Masters Of Science In Education Degree To The Time They Nefariously Forced Him Out Of The School System, Out of Higher Education, Out of Society, & Out of Health. DOE Nefariously Lied That They Never Received Proof [From The Department of Education's Own City University of New York (CUNY)] That Educator Mr. Perez Completed His Masters Degree Despite CUNY Producing Official Transcript With Date Indicating The Contrary & Despite Educator Perez Repeatedly Providing DOE copies of his transcripts, Copies of His Degrees & Certifications, & Official letters from CUNY Professors.

B. What They Owe Him From The Time He Earned Each Of The Other Multiple New York Sate Teaching Certifications (Referenced @ The Opening Of This Complaint & Discussed On Report Forwarded To Chancellor Farina & Others) To The Time They Nefariously Forced Him Out Of The School System, Out of Higher Education, Out of Society, & Out of Health.

[see electronic mail chain between payroll secretary Maldonado & HR Director Gooden, PLEASE RESPOND WITH A SOLUTION. Importance: High, January 20, 2015: eight (8) pages. Electronic mail sent to Superintendant Manuel Ramirez, Chancellor Carmen Farina, & multiple other DOE & Union Officials – including HR Directors Danette Gooden & Charles Peeples; Perez, Luis A. Salary Step Scam?, February 01, 2015: four (4) pages]

C. What They Owe Him In Raises For Their Nefarious, Deceptive, & Damaging Persecution, Retroactive Pay For The Five (5) Years Of Raises Owed To All Educators For Years DOE Allegedly Failed To Secure Contract With Union Which Other Educators Received Except Educator Mr. Perez.

(3) Any Court, Legal Fees, & Related Costs (Such As U.S. Postal Service Priority Mail Expenses, Printer Ink Expenses, Xerox Copies, Faxes Sent, Paper Used, ...) Incurred By Being Forced To File Suit Against the DOE & Union & Having To Bring Suit Against Individual Persons (If Allowed By The Court) For The Public Good.

(4) Permission To Also File Suit Against Individual Persons Involved (Retired Or Not) For Their Individual Participation In The Damages Caused To Educator Mr. Perez's Career, Character, & Health.

(5) Complete Student Loan Forgiveness For Their Deceptive Predatory Lending Of Federal Student Loans & For Their Role In Obstructing Perez's Return To Higher Education.

(6) Free Tuition From Any CUNY College For Educator Mr. Perez & Any Of His Family Members Interested In Attending College & For All Of Educator Mr. Perez's Students & Their Family Members That Were Unfortunately Subjected To Such Abuses For So Long.

(7) To Be Made Whole In All Ways In Respect To His Career, Character, & Employment Record. For Example Expunge All False & Nefarious Allegations From His Record In The DOE & Union & Provide Favorable Formal Letters Of Recommendation On DOE & Union Department Letterhead With Official Seal.

(8) Compensatory Damages: Pain & Suffering Due To DOE's & Union's Intentional Infliction Of Physical & Emotional Distress.

(9) Punitive Damages: due to DOE's & Union's Intentional Infliction Of Physical & Emotional Distress & Complete Disregard For Student's Safety & Education So As To Clearly Send Firm Message That Such Abuse Of Power Cannot Go On Because All Students & Educators Deserve Equal Treatment.

(10) Repair Credit Score & Pay For Late Fees & Accumulated Bills.

(11) Public Apology Especially In The Amistad Community In Order To Repair The Fear & Trauma Which Officers Of The DOE & Union Deliberately Imposed Upon Educators, Families, & Students By Using Educator Perez As A Spectacle & Example Of What Will Happen To Others That Speak-up Against Abuse Of Power.

(12) Order DOE & Union To (a) Conduct More Fair & Sound Investigations For All, (b) Provide Unbiased & Independent Oversight Over Complaints Of Abuse & Investigations Especially Those Made Against More Powerful & More Protected Administrators & Lawyers, (c) Create Legislation/Policies That Truly Enforce Transparency, Accountability, Training That Is Meaningful & Ongoing Especially For Leaders That Engage In Abuse Of Power & Discrimination & For Those Who Fear Reporting Abuses, & Oversight That Is Truly Independent In Order To Enforce Checks & Balances Of Power.

(13) Assign An Independent Impartial Monitor To Handle Investigations & Allegations Made Especially Against Powerful Politically Protected Staff & Supporters.

Judicial Misconduct, Conflict, & Erroneousness

Attempts to sabotage Educator Mr. Perez's due process, statute of limitation, & obstruct justice in favor of the DOE & Union & to the detriment of Educator Perez was also evident in the handling of his complaint by The Director of the "Equal" Employment Opportunity Commission (EEOC), His Legal Counsel, *[see report & timeline; Perez, Luis A. Are The Services By The Equal Employment Opportunity Commission Actually Equal?, October 2015: three (3) pages.]*, the District Court, & the Court of Appeals.

Educator Mr. Perez disagrees with the OPINION & ORDER issued *[signed & Electronically Filed Friday, September 15, 2017]*, by District Court Judge Paul A. Engelmayer & JUDGEMENT issued by Clerk of Court Ruby J. Krajick *[signed & Electronically Filed Monday, September 18, 2017]* both of which concern the above captioned AMENDED COMPLAINT FOR EMPLOYMENT DISCRIMINATION case against DOE *[initially filed by Educator Mr. Perez in the District Court of New York Tuesday, September 08, 2015]*. Educator Mr. Perez received said OPINION & ORDER & said JUDGEMENT together via "snail mail" Thursday, September 21, 2017. Loretta A. Preska then Chief United States District Court Judge was initially assigned to

this complaint. Eventually, the complaint was reassigned to District Judge Paul A. Engelmayer & Magistrate Judge Kevin Nathaniel Fox – without any formal notice to the Plaintiff. Contrary to compelling evidence, in said OPINION & ORDER Judge Engelmayer knowingly, falsely, & unfairly reported – *“In January 2017, this Court denied without prejudice Perez’s application for appointment of counsel. Dkt. 29. Because DOE has not yet responded to the Amended Complaint, the Court could not reasonably assess the merits of Perez’s claims. See id. And because the merits are ‘[t]he factor which command[s] the most attention’ in a Court’s determination of whether to grant a plaintiff’s request for counsel ... the Court denied Perez’s request with leave to renew the request later in the case. Dkt. 29 Perez did not renew that request.”*

However, evidence shows that on & after January 2017 Educator Mr. Perez requested appointment of Counsel from the Courts.

(1)

Sunday, January 08, 2017 Educator Mr. Perez mailed to the Court letter titled, MOTION TO REQUEST ASSIGNEMENT OF COMPETENT COUNSEL(S) IN ORDER TO FAIRLY PRESENT THESE PUBLIC INTEREST COMPLAINTS BEFORE THE HONOR OF THIS COURT & IN ORDER TO SAFELY COMMUNICATE WITH OPPOSING COUNSEL(S). Such request was addressed to District Court Judge Paul A. Engelmayer & United States Magistrate Judge Kevin Nathaniel Fox. Educator Mr. Perez’s note was also mailed to DOE’s Counsel; Assistant Corporate Counsel of NYC Evan M. Piecey & Corporate Counsel of NYC Zachary W. Carter. In said letter, among other things, Educator Mr. Perez included,

“Please note that I consider it a mockery that after all of the intentional infliction of emotional distress which I have to endure and after so many Officials and Counsels of the NYC/DOE, (& other organizations), have been for so long consistently notified of my complaints, they are requesting more, ‘time to investigate the allegations contained in the Complaint’”

“I humbly request for the Honor of this Court to assign me competent Counsel(s) in order to fairly present these rampant abuse of power complaints & violations of Natural & Constitutional Law complaints, which are detrimental to human health, the public good, and the entire human race & in order for me to ‘safely’ communicate with opposing Counsel(s)”.

(2)

Wednesday, February 08, 2017 Educator Mr. Perez mailed report to District Court Judge Paul A. Engelmayer & United States Magistrate Judge Kevin Nathaniel Fox titled, PLEASE PROVIDE GUIDANCE REGARDING DEFENDAN'S RECENT MOTION TO DISMISS MY COMPLAINT, (also mailed to DOE Counsels).

Among other important information, Educator Perez included –

*"I humbly request for the Honor of this Court to assign me competent Counsel(s) in order to fairly present, before the Honor of this Court & the Honor of a Jury of my peers, these rampant abuse of power & violations of Natural & Constitutional Law complaints, **which are detrimental to human health, the public good, and the entire human race.**"*

(3)

Tuesday, March 08, 2017, Educator Mr. Perez mailed a packet of documents addressed to District Court Judge Paul A. Engelmayer & United States Magistrate Judge Kevin Nathaniel Fox titled, OPPOSITION TO DEFENDANT'S MOTION TO DISMISS MY COMPLAINT, (also mailed to DOE Counsels). In the cover letter to this packet, among other important information, Educator Perez once again requested from the District Court the assignment of legal Counsel. Educator Perez writes –

*"I humbly request for the Honor of this Court, in respect to the public's interest, to assign me competent Counsel(s) in order to fairly present, before the Honor of this Court & the Honor of a Jury of my peers, these rampant abuses of power & gross violations of Constitutional & Human Rights; **corrosive to human health, the public good, and the entire human race. Please Help. These Humans cannot get away with treating other Humans in such inhumane fashion.**"*

In said OPINION & ORDER, [as well as in said JUDGEMENT], in order to completely unfairly dismiss Educator Perez's complaint the Court repeatedly misrepresented the U.S. Magistrate Judge Kevin Nathaniel Fox's recommendation writing –

(1) "... that the Court grant ...", the DOE's "... motion to dismiss ..." the above captioned AMENDED COMPLAINT FOR EMPLOYMENT DISCRIMINATION.

(2) That, "... the Court adopts the recommendation of the Report and dismisses this action."

(3) That United States Magistrate Judge Kevin Nathaniel Fox wrote a report, "recommending that DOE's motion to dismiss be granted".

(4) That, "This Court reviews the remainder of Judge Fox's conclusions for clear error and finds none."

(5) That, "The Court therefore adopts Judge Fox's Report in its entirety ..."

(6) That, “*Before the Court is the August 2, 2017, Report and Recommendation (‘Report’) of the Honorable Kevin Nathaniel Fox. United States Magistrate Judge, recommending that the Court grant the motion to dismiss ...*”

(7) That, they are, “*... adopting Judge Fox’s Report in its entirety ... granting the DOE’s motion to dismiss the Amended Complaint ...*”

(8) That, “*... Judge Fox’s Report is adopted in its entirety ...*”

However, the Court disingenuously & meticulously strayed from the important fact that in the August 02, 2017 REPORT AND RECOMMENDATION the Honorable U.S. Magistrate Judge Kevin Nathaniel Fox wrote: “*I recommend that the defendant’s motion to dismiss ... be denied, in part, pursuant to Fed. R. Civ. P. 12(b)(1), and granted, in part, pursuant to Fed. R. Civ. P. 12(b6).*”

Additionally, It is immensely deceptive for the Court to claim that they are, “*... adopting Judge Fox’s Report in its entirety ...*”, when they are, in fact, only adopting the report *PARTIALLY*.

Suppression Of Civil Rights Litigation In Favor Of Force Arbitration:

The District Court attempted several times to push-out of the Courts this important AMENDED COMPLAINT FOR EMPLOYMENT DISCRIMINATION by claiming several times that they never received his correspondences (despite sent via USPS Priority Express Mail) & by underhandedly issuing a MEDIATION REFERRAL ORDER FOR PRO SE EMPLOYMENT DISCRIMINATION CASES where the District Court emphasized that any objections to said order, “*must be filed within 14 days of this order*”, but nefariously neglected several times to suppress the existence of such order in turn depriving Educator Mr. Perez from the opportunity to file any objections to the arbitration.

Medical Injunction Repeated Requests Ignored:

On several occasions Educator Perez submitted pleas for an injunction from the District Court – requesting the Judge to order DOE to restore his nefariously suspended medical benefits in order for him to continue critical pending medical treatments. Unfortunately, such pleas were ignored by the District Court,

[mail sent to Courts; Perez, Luis A. MORE EVIDENCE & REQUEST TO ORDER DOE TO RESTORE MEDICAL COVERAGE, January 21, 2016 & Perez, Luis A. LOST AMENDED COMPLAINT REQUEST TO RE-OPEN CASE, February 01, 2016].

Evidence also shows questionable & nefarious handling of the Educator Mr. Perez Employment Discrimination & Abuse of Power Complaints by the United States Court of Appeals.

When you superimpose the nefarious back & forth dynamics concerning the Employment Discrimination & Abuse of Power Complaints against the Union along with the back & forth dynamics concerning the same complaints against the DOE (*now before the Honor of The Supreme Court*) – all becomes even more difficult to follow. Perhaps such is the intended goal; to repeal indigent litigation & reserve Justice just for a selected few.

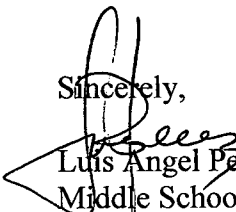
I want you all to know that all of this has taken a great toll on my family & me. Having to read & write about these experiences is like reliving the trauma. It hurts especially after knowing that justice has been denied for so long and by so many Public & Court Officials who have taken an oath of office, get paid from the Public's tax revenue, and call themselves "leaders". We can & must do better for humanity. Thank you.

Please help us REALLY fix Public Schools & Communities of ALL Humans, Learners, & Educators.

We thank you ALL for ALL that you do to make this world a better place for ALL.

Hope to hear from you soon.

Sincerely,


Luis Angel Perez,
Middle School, (7th & 8th), Science & Mathematics,
First Grade, Fourth Grade, Educator & Advocate
<https://writing4light.tumblr.com/>
<https://writing4light.blogspot.com/>

Date: 3/07/18

SUPREME COURT OF THE UNITED STATES WASHINGTON, D.C. SUPREME COURT DOCKET # _____

_____ x

Re: COURT OF APPEALS DOCKET # 17-3111 (RAK) (COW);
District Court Case # 15-CV-7156 (PAE), (KNF), & (LAP).

Luis Angel Perez, Educator, :
Plaintiff, :
-against- :
New York City Department of Education :
Defendant. :

Also Related To
Court of Appeals docket #17-55 (RAK) (COW) Perez v NYSUT/UFT Union;
District Court Case # 15-CV-8023 (LAP),

& the now well over eight-hundred (800) pages of critical evidence mostly in the
form of contemporaneous emails, notes, & official reports, already in the courts.

**REASONS FOR GRANTING INDIGENT PETITION
FOR WRIT OF CERTIORARI
& CONCLUSION**

_____ x

Wednesday, March 07, 2018

Supreme Court should grant this indigent petition of grievance or indigent writs of certiorari for the following reasons:

(1) The DOE & Union repeatedly lie to Educators, Families, Students, the Public & the DOJ about their efforts to fix their system specifically designed to obstruct the reporting of abuse, sound investigations, & equal justice corrosive to our democracy. Friday, August 28, 2015 *"The Chief"* which is *"The Civil Employees' Weekly"* newspaper reported that a Deputy Commissioner of the Special Commission of Investigations (SCI) found that DOE maintains a *"lax oversight"* of its investigations & were actually caught falsifying allegations against Educators, provided insufficient supervision of investigations, & that DOE legal staff were allegedly reviewing internal investigation reports not for truth, accuracy & fairness but only for grammar & spelling. Officials reportedly held a meeting that included City Investigation Commissioner Mark G. Peters, Special Commissioner of Investigation for the Public Schools Richard J. Condon & School Chancellor Carmen Farina resulting in the announcement that *"the DOE investigative process has been dramatically revised to ensure greater oversight ..."*. However, Perez v NYCDOE & Perez v NYSUT/UFT Union clearly reveals the complete opposite & proves yet another reason why the DOE would desperately want to deeply bury their corruption, their abuse of power, & their complete disregard for the rule of law along with Educator Mr. Perez.

This bares a striking resemblance to the infractions recently reported by *BuzzFeed News* where internal New York City Police Department files, *"show that hundreds of officers who committed the most serious offenses ... got to keep their jobs, their pensions, and their tremendous power over New Yorker's lives."* [Taggart, K. & Hayes, M. *"Secret NYPD Files: Officers Can Lie And Brutally Beat People – And Still Keep Their Jobs"*. *BuzzFeed News*, March 05, 2018.

"The Chief" also reported that in one case pertaining to the DOI's investigation – DOE Officials argued that they could not locate a corrupt investigator whom was coined *"the runaway investigator"*. Such claim bares a striking resemblance to the claims made during Educator Mr. Perez's NYS 3020a hearing where DOE Officials & Lawyers repeatedly argued that they cannot locate Principal Ms. Pedraja to testify but that her reports will still be allowed as evidence against him. Such striking resemblance between how investigations were obstructed within the NYPD & within the DOE may very well be related to the fact that longtime Top Brass Special Commissioner of Investigations for the NYC Public School System (Richard J. Condon) was the Former First Deputy Commissioner of the New York Police Department, the Former Police Commissioner, & the Former Commissioner of The Division of Criminal Justice Services under Governor Cuomo. A further disservice to the public good is the fact that the news reported by *"The Chief"* was suppressed into a remote weekly newspaper mostly used by humans to find the schedule to City, State, & Government Job Examinations & not widely covered by local education reporters.

(2) As evidence shows & as referenced in the *"Statement of the Case"* section of this here writ – the lower courts' decisions against Educator Mr. Perez were flawed, untrue, & in conflict with decision made by a Senior Magistrate Judge whom actually ruled that the DOE's *"... motion to dismiss, be denied, in part ..."*. Despite the fact that evidence shows several judges actually found significant merit in Educator Mr. Perez's complaint – after vigorous nefarious games played by other Judges, Court Clerks, & Court Staff in favor of the DOE & Union & to the complete detriment of Perez's rights & the Public Good – the Courts knowingly lied about Perez's repeated requests for legal help, underhandedly & nefariously attempted to push his complaint out of the Courts & into forced arbitration, & in many other ways derailed justice by mishandling Perez's complaint. The District Court & the Court of Appeals of the City of New York had the jurisdiction, the power, & the grand opportunity to allow for such serious grievance to be fairly litigated before a Judge & Jury &/or in some fashion help hold Public School Officials accountable for violating Perez's (& many others') Human & Constitutional Rights. Instead, they opted to reject such complaint & in such way managed to project the Courts' partiality in enforcing The Rule of Nature & The Rule of Law – for all humans.

(3) The questions involved in this here complaint are of national importance. The unchecked stronghold the DOE & Union has over fair investigations within the DOE & over officers of the Department of Justice, & over really improving our Public Schools is a matter of grave concern to other similarly situated humans across our city, across our nation, & to our humanity. The NYC Public School System is the biggest school system in the United States & thus should set the standard to the entire nation on how to truthfully treat all humans in our schools, families, & communities with utmost respect, dignity, & equality. This system should be the model to our nation & the world of the firmest pillar of good government instead of teaching our students, our future leaders, that it is the exact opposite of good deeds which is most valued & rewarded in our humanity & which ensures an individual's power & success. Evidence shows that discriminations & segregation in our schools is getting worse & that such segregation functions to make it easier for authorities to unconstitutionally deny equal & fair resources & quality education to brown, black, & indigent humans while depicting such humans as inferior to others. For years Educator Mr. Perez witnessed hardworking middle school student's souls crushed by the existing suppression to the access of Specialized High Schools accompanied every year with empty promises by Public Officials that such disparity in the system will be fixed. Politicians & Public School "*Leaders*" & lawyers come & go (with secured pensions & generous severance packages) to incite plausible deniability but what continues to remain for the public is this broken system that promotes broken promises & molds a broken future for the entire human race.

The rational argument, in law & in fact, set forth in Educator Mr. Perez's complaint is that the unchecked brazen complete disregard, by School, Union, Legal, & other New York Public Officials toward, (A) the rule of "*Natural & Constitutional Laws*", (B) the "*Oath of Public Office*" social contract, (C) the practice of "*Testifying Truthfully Under Oath*" – especially in the midst of life altering "*Investigations*" & "*Judicial Hearings*", (D) the dangerous "*Cover-ups*" & "*Authoritative Terror*" specifically designed & implemented to oppress & undermine fair investigations & honest testimonies & to derail any hope for crucial & meaningful Transparency, Accountability, Training, Oversight, & thus healthy growth, & other forms of Abuse of Power, directly & effectively, (1) obstructs the academic, intellectual, & humane development & quality of life of especially constitutionally-protected groups of students, families, ...

& communities; (2) hinders the career, character, & health of professionals operating in good faith; (3) nurtures a social construct that is bonded & mobilized by nefarious undercurrents of bias & discrimination; (4) via punishments & rewards (or “*Operant Conditioning*”) nurtures a sense that such group of humans are inferior; (5) forces even the most educated minds into the dangerous practice of shallow processing important reportable occurrences of abuse in the academic workplace; (6) nurtures the falsehood that humans occupying administrative roles are inherently infallible in motive & judgment & thus impervious to scrutiny or challenge; (7) & it casts a lot of smoke over the adverse impact which such immoral & unethical business practices have on all humans. It is unnatural for certain groups of humans to be oppressed from Education, Human Rights, Constitutional Rights, & Justice while such is reserved only for a selected few. We are all from the same Human Race. We are all the same color inside of our hearts. We are all capable of changing this systemic problem. We are all charged with the Natural Responsibility to Nurture, Facilitate, & Enhance the Human Race in this brief journey we call life.

CONCLUSION

For the foregoing reasons mentioned in this here writ, in complaints submitted, & proven by the now well over eight-hundred (800) pages of contemporaneous electronic mail, formal reports, notes & affidavits already submitted as evidence to the Courts Educator Mr. Perez Respectfully Petitions the The Supreme Court Of The United States for a Redress of these Important Public Interest Grievances & said **petition for writ of certiorari should be granted.**

Please help us REALLY fix Public Schools & Communities of ALL Humans, Learners, & Educators. We thank you ALL for ALL that you do to make this world a better place for ALL. Hope to hear from you soon.

Sincerely,



Luis Angel Perez,
Middle School, (7th & 8th), Science & Mathematics,
First Grade, Fourth Grade, Educator & Advocate

<https://writing4light.tumblr.com/>

<https://writing4light.blogspot.com/>

Date: 3/7/18

Also Mailed To: Max Oliver McCann New York City Law Department 100 Church Street New York, New York 10007 Tel. (212) 356-2345 & Fax (212) 356-2059 Listed As Substitute Counsel - Replacing Lead Counsel - Evan M. Piercey, Assistant Corporate Counsel & Zachary W. Carter, Corporate Counsel of New York City Attorney for Defendant 100 Church Street, Room 2-173 New York, New York 10007 (212) 356-2428.