

No. _____

IN THE
United States Supreme Court

DR. LILLIE M. COLEY, PHD
Petitioner,

v.

NEW JERSEY SUPREME COURT
Respondent(s).

*On Petition for a Writ of Certiorari to
United States Supreme Court*

PETITION FOR A WRIT OF CERTIORARI

Lillie M. Coley, PhD

QUESTIONS PRESENTED

1. Can the court deny Full, Faith and Credit to a valid sister state Order with a Certify DNA attached dated April 18, 2011 and not be in violation of 28 U.S.C. § 1738 since no due process occurred?
2. Can an Appeal Support a denial of valid sister state court order with no due process and not be violation of Civil Rights and The **14th Amendment** of the United States Constitution which gives everyone a right to due process of law.

List of Parties

All Parties appeal in the caption of the case on the cover page.

Lillie M. Coley, PhD

Vs.

NEW JERSEY Supreme Court

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STATEMENT OF THE BASIS FOR JURISDICTION

This court has jurisdiction pursuant to **28 U.S.C.1257(a)**. Petitioner seeks **review** of the New Jersey Supreme Court Petition for Review dated Sept. 25, 2020. There was no opinion provided by New Jersey Supreme Court. This court has jurisdiction on a full, faith and credit with constitutional issues. 28 U.S.C. §1254 (1). There is diversity of citizenship between the parties and the amount in

controversy exceeds the sum of \$100,000. The district court had jurisdiction in cases and controversy under 28 U.S.C. §1332(a).

RELEVANT CONSTITUTIONAL PROVISION

No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United 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. The **14th Amendment** of the United States Constitution gives everyone a right to due process of law, which includes judgments that comply with the rules and case law. Most due process exceptions deal with the issue of notification. If, for example, someone gets a judgment against you in another state without your having been notified, you can attack the judgment for lack of due process of law. In *Griffen v. Griffen*, 327 U.S. 220, 66 S. Ct. 556, 90 L. Ed. 635 pro se litigant won his case in the Supreme Court. Finally, “A writ of certiorari is a discretionary, extraordinary writ—and is therefore never granted as a matter of right.” *See, e.g., King v. Taylor*, 188 N.C. 450, 451, 124 S.E. 751, 751 (1924) (explaining that the writ “is allowed only on a reasonable show of merits and that the ends of justice will be thereby promoted”). Petitioner relies on the merits and duties of the father to provide for the family, barring that, for the Court to step in and provide a fair legal means to adjudicate his absence.

Full, Faith and Credit

Well settled case law declares that these materials should receive “the same full faith and credit” in each state that they have in the state “from which they are taken.” *Ex parte Seidel*, 39 S.W.3d 221, 225 (Tex. Crim. App. 2001). Noting the United States Supreme Court has ruled on this issue in 577 U. S. ____ (2016), (US Supreme Court granting), stated, “with respect to judgments, “the full faith and credit obligation is exacting.”” *Baker v. General Motors Corp.*, 522 U. S. 222, 233 (1998). “A final judgment in one State, if rendered by a court with adjudicatory authority over the subject matter and persons governed by the judgment, qualifies for recognition throughout the land.” *Ibid.* “Consequently, before a court is bound by [a] judgment rendered in another State, it may inquire into the jurisdictional basis of the foreign court’s decree.” *Ibid.* That jurisdictional inquiry, however, is a limited one. “[I]f the judgment on its face appears to be a ‘record of a court of general jurisdiction, such jurisdiction over the cause and the parties is to be presumed unless disproved by extrinsic evidence, or by the record itself.’” *Milliken*, *supra*, at 462 (quoting *Adam v. Saenger*, 303 U. S. 59, 62 (1938)). Here in this case, the Court rendered no hearing and placed no weight on the Judgment, instead focusing on other matters that in hindsight should not have been heard in light of the sister states prior Judgment or until such time as the question of law is settled. Justice Holmes lamented in his decision, “The Georgia judgment appears on its face to have been issued by a court with jurisdiction, and there is no established Georgia law to the contrary.” *Id.*

Civil Rights Title VII of the Civil Rights Act of 1964,1983

42 U.S.C. Section 2000e et sec, and the Rehabilitation Act of 1973, 29 U.S.C. § 701, when parties were denied due process subjected to gender discrimination, retaliation, disability, and race. A civil right is an enforceable right or privilege, which if interfered with by another gives rise to an action for injury. Discrimination occurs when the civil rights of an individual are denied or interfered with because of the individual's membership in a particular group or class. Various jurisdictions have enacted statutes to prevent discrimination based on a person's race, sex, religion, age, previous condition of servitude, physical limitation, national origin, political affiliation and in some instance's sexual orientation.

STATEMENT OF THE CASE

PETITION FOR WRIT CERTIORARI

A judgment procured by fraud due to lack of Full, faith and credit can be attacked at any time, in any court, either directly or collaterally and should be vacated along with all proceeding order under that docket number FD-04-2874-12 and grant full, faith and credit to valid sister state PA order dated April 18, 2011 with certified DNA attached by the Judge. Petitioner respectfully prays that the writ of certiorari review the judgments.

Introduction & Procedural History

In this High Profile Case involving a male performer money appears to be the motive for the allegations. At its core, this case is about the corruption of a state's legal system at all levels. Corruption, concealment, bribery etc. determine the outcome of cases not based on facts, evidence, or law of the land as **no hearing or fact finding took place**. But, instead corrupt self-serving personal interests of attorneys, and arms and agents of the state. This is a case alleging Defendant, New Jersey Courts, through its agents and arms of the state, individually and together, and or, in their official capacity, conspired and actively, denying full, faith and credit to valid orders and DNA which is discriminatory in nature.

The State, its agents, arms of the state, and officers of the court, have though a **“breach of fiduciary duty”, “monopoly”, “intentional gross negligence** a matter of unconstitutional policy, conspired, aided, abetted and violated Petitioners rights protected under the Constitution of the United States and State Constitution, and have violated federal laws as follows: denial of due process, denial/ignored full, faith and credit for valid orders with DNA's attached, failing to provide Equal Protection under the law, and failing to provide “Honest Services”; causing Petitioner to be wrongfully denied her damages under color of law, causing her great financial loss and personal harm.

Moreover, the Court ignored the April 18, 2011 disestablishment, dispositive of Graves's paternity and failed to grant Full Faith and Credit to the Pennsylvania Order.

So, over many years the attorneys and Judges continue or allowed false statements and court corruption with No Due Process in a high profile case.

Relevant Procedural History

This case arises out of two jurisdictions but it begun in Philadelphia, Pennsylvania **PUBLIC** Cases of Wanda Satterthwaite vs Robert Graves(vacated 2011) and separate case of Wanda Satterthwaite vs S.C(void 2011)).

On **July 16, 2010** Wanda Satterthwatie requested two(2) men to submit to a paternity test, Robert Graves and S.C. However, neither man showed up because they were not served. PA Judge issued two(2) orders: one for Graves and one for S.C as stated above. Legally, S.C's order depended upon Graves.

Beginning on **April 18, 2011**, Graves is Disestablished, Support Order Vacated and paternity dispositive per Pennsylvania Court Order (Appendix **B**) on matter of Rymir. His name was removed from birth certificate in May 2011 while Rymir was still a minor.

Rymir moves to New Jersey while a minor during this time **May 2011** due to failing health of his mother, Wanda. Coley obtains full custody of Rymir per New Jersey Court Order while he was still in high school.

On November 17, 2014 [REDACTED]
[REDACTED]

REASON FOR GRANTING THE WRIT

Petitioner asks the Court to take judicial notice of the fact that she is without counsel, is not apt in the laws and legal procedures, and is not an attorney licensed to practice law. Therefore, her pleadings must be read and construed liberally.

Understanding **after the death** of Petitioner's attorney along with other circumstances the court took advantage of Petitioner by not granting full, faith and credit to sister state valid order. See *Haines v. Kerner*, 404 US at 520 (1980); *Birl v. Estelle*, 660 F.2d 592 (1981). Further Petitioner believes that this court has a responsibility and legal duty to protect any and all of Petitioner's constitutional and statutory rights. See, *United States v. Lee*, 106 US 196,220 [1882].

"No state shall deny any person within its jurisdiction the equal protection of the laws. U.S. Constitution. Amend. XIV,1. The constitution provision states above is essentially direction that all persons similarly situated should be treated alike." City of Cleburne, Texas v Cleburne Live Center, 473 U.S. 432, 439 (1985).

U.S. 134, 167 (1974). The **Due Process Clause** provides heightened protection Against government interference with fundamental rights and liberty interests. *Reno v. Flores*, 507 U.S. 292, 301-02 (1993).

A) Valid PA Order April 18, 2011 but Petitioner was DENIED Full, Faith and Credit for Valid Order of April 18, 2011 DUE TO NO DUE PROCESS

Petitioner was Not given Full Faith and Credit for sister state PA Order dated April 18, 2011 (Appendix B) due to No DUE PROCESS, but the male party was given full, faith and credit for sister state PA Order which no longer have any legal value since this order depended upon an Order that was VACATED.

28 U.S.C. § 1738, declares that these materials should receive “the same full faith and credit” in each state that they have in the state “from which they are taken.”

The Court Ignore the Section 2 clause of the constitution that reads: “The Citizens of each State shall be entitled to all Privileges and Immunities of Citizens in the several States”.

By not granting Full, faith and Credit allowed fiction over facts to litigate the case allowing more Fraud Upon the court and denying parties of their Human Rights under the 14th Amendment. This legal right for sister state Pennsylvania Order dated April 18, 2011 which is a valid Order with certified DNA attached by the Judge.

The fundamental requirement of due process is an opportunity to be heard at a meaningful time and in a meaningful manner. *Armstrong v Manzo*, 308 U.S. 545, 552, 85 S.Ct. 1187, 1191, 14 L.Ed.2d 62(1965). See *Grannis v Ordean*, 234 U.S. 385, 394, 34 S.Ct. 779, 783, 58 L.Ed. 1363(1914). *Mathews v Eldridge*, 424 U.S. 319, 333, 96 S.Ct., 893, 47 L.Ed.2d 18(1976).

U.S. 134, 167 (1974). The Due Process Clause provides heightened protection against government interference with fundamental rights and liberty interests. *Reno v. Flores*, 507 U.S. 292, 301-02 (1993).

Well settled case law declares that these materials should receive “the same full faith and credit” in each state that they have in the state “from which they are taken.” *Ex parte Seidel*, 39 S.W.3d 221, 225 (Tex. Crim. App. 2001). Noting the United States Supreme Court has ruled on this issue in 577 U. S. ____ (2016), (US Supreme Court granting), stated, “with respect to judgments, “the full faith and credit obligation is exacting.”” *Baker v. General Motors Corp.*, 522 U. S. 222, 233 (1998). “A final judgment in one State, if rendered by a court with adjudicatory authority over the subject matter and persons governed by the judgment, qualifies for recognition throughout the land.” *Ibid.* “Consequently, before a court is bound by [a] judgment rendered in another State, it may inquire into the jurisdictional basis of the foreign court’s decree.” *Ibid.* That jurisdictional inquiry, however, is a limited one. “[I]f the judgment on its face appears to be a ‘record of a court of general jurisdiction, such

jurisdiction over the cause and the parties is to be presumed unless disproved by extrinsic evidence, or by the record itself.” *Milliken*, supra, at 462 (quoting *Adam v. Saenger*, 303 U. S. 59, 62 (1938)). Here in this case, the Court rendered no hearing and placed no weight on the Judgment, instead focusing on other matters that in hindsight should not have been heard in light of the sister states prior Judgment or until such time as the question of law is settled. Justice Holmes lamented in his decision, “The Georgia judgment appears on its face to have been issued by a court with jurisdiction, and there is no established Georgia law to the contrary.” *Id.*

Denial of Due Process - The many denials by the trial court to invoke fear of potentially being in civil contempt for an order that the petitioner was never allowed to defend has kept the petitioner from having any fair and unbiased hearings and doesn't understand why the trial court has disregarded the requirements of fairness in due process. **28 U.S.C. Rule 455 and 455(A)**. Act in excess of judicial authority constitutes misconduct, particularly where a judge deliberately disregards the requirements of fairness and due process. Geil v Commission on Judicial qualifications, (1973)10 Cal.3d 270,286.

An Appeal cannot support a denial of valid sister state court order with no due process and not be violation of Civil Rights and The **14th Amendment** of the United States Constitution which gives everyone a right to due process of law.

Due process is the principle of fairness in legal proceedings so that a person has the right to know what action is being taken and has an opportunity to be heard. The united state Supreme Court decision Armstrong v Mango.U.S.545(1965) which is a fundamental requirement of due process is an opportunity to be heard,Grennis v Ordean,234 U.S.384,394.

Based on the Appeal court allowing no due process it caused **continuous violations** of abuse of power in the form of "malfeasance in office" or "official misconduct", is the commission of an unlawful act, done in an official capacity, which affects the performance of official duties. **The law firms and corrupted Judges went back with illegal orders to cover up no due process over many years.**

This abuse allowed the court to enter an **illegal bond** on Petitioner's residential properties where *neither facts nor due process occurred*. The Supreme Court in **The Marbury v Madison, 5 U.S.137(1803)** has stated that the Constitution is the supreme law of the land, and any law that is repugnant is nulled and void from its inception.

The petition draws into question the constitutionality of the New Jersey's Practice of denying the **right to be heard** to an indigent pro se litigant before entering any

judgments that may result in the petitioners contempt citation, incarceration and **property loss.**

The State Court has erred in the misdirection of law that discriminated against a pro se litigant to be heard. The United States Supreme Court has consistently held that some form of hearing is required before an individual is finally deprived of a property interest. Wolff v McDonnell, 418 U.S. 539, 557-558, 94 S.Ct. 2963, 2975-2976, 41 L.E.2d 935(1974). See, e.g. Phillips v Commissioner of Internal Revenue, 283 U.S. 589, 596-597, 51 S.Ct. 608, 611-612, 75 L.Ed. 1289(1931). See also Dent v West Virginia, 129 U.S. 114, 124-125, 9 S.Ct. 231, 234, 32 L.Ed. 623(1889).

The right to be heard before being condemned to suffer grievous losses of any kind, even though it may not involve the stigma and hardships of a criminal conviction, is a principle basic to our society. Joint Ant-Fascist Comm. v McGrath, 341 U.S. 123, 168, 71 S.Ct. 624, 646, 95 L.Ed. 817(1951)(Frankfurter.J.concurring).

CONCLUSION

There was not any due process of fact finding. The Court denying full, faith and credit to full and effect order dated April 18, 2011 w/ certified DNA should receive

“the same full faith and credit” in each state that they have in the state “from which they are taken.”

The petitioner hereby asks this Honorable Court to award the relief requested in this Petition for Writ of Certiorari of not obtaining full, faith and credit of certify order. And, all other legal and equitable relief as this Court may deem necessary.

Understanding after the death of Petitioner’s attorney along with other circumstances the court took advantage of Petitioner. Allowing **continuous violations** of abuse of power of no Due Process over many years.

I declare under penalty of perjury that the foregoing information above in this Writ is true and correct belief and knowledge.

Petitioner, Lillie M. Coley, PhD