

ORIGINAL

No. 24 – 6723

In the
Supreme Court of the United States

Carol Lynne Morgan
Petitioner,

PETITIONER'S PETITION
FOR REHEARING

v.

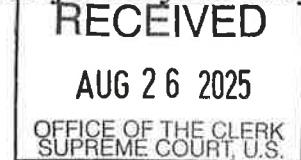
Leby H. Sassy
Respondent,

On Appeal and Petition for Writ of Certiorari to The United States Supreme Court
From The 11th District Court of Appeals Case No. 2023 -TR- 0048 (Affirmed). Further
Appealed to The Ohio Supreme Court Case No. 2024 – 0739 (Declined), no Opinion.

PETITIONER'S PETITION FOR REHEARING OF THE UNITED STATES
SUPREME COURT'S MAY 19, 2025 DENIAL OF PETITIONER'S APPEAL AND
PETITION FOR WRIT OF CERTIORARI.

Carol Lynne Morgan
878 Indianola Road
Boardman, Ohio 44512
(330) 557 – 0411
Pro se

Elise M. Burkey
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Counsel for Leby H. Sassy



Now here comes Carol Lynne Morgan, (hereinafter Petitioner), Petitioner files this **Petition For Rehearing in ‘Good Faith’, not for delay**, and its grounds shall be limited to intervening circumstances of a substantial or controlling effect **or** to other substantial grounds not previously presented according to **S. Ct. Rule 44**, in her **Case No. 24 – 6723**. Petitioner requests that her Rehearing shall be Heard by the Justices themselves for fairness, and not to be Heard by the Clerk’s office or Members of the BAR Association that work in the Justice’s offices for the following reasons, but not limited to these :

The U. S. Constitution’s **Article III, Section 2, Clause 2**, mandates that “judges in both the Supreme and inferior courts **“Shall”** hold their offices during **“good behavior”**, and provides that, Congress has exercised its power to implement the provision granting the U.S. Supreme Court Appellate Jurisdiction to review both decisions of the inferior Federal Courts, and **final judgments from State Courts that involve violations of Constitutional and Federal Law.**

Article III Section 2. C2.4 states the U. S. Supreme Court **‘Shall’** have, both as to Law and Fact, Appellate Jurisdiction to hear Petitioner’s **Appeal**. Petitioner’s **Appeal** and **Petition for Writ of Certiorari** are clearly printed on the cover page of Petitioner’s **Case No. 24 – 6723**, which she filed into this Court on **November 27, 2024**. **EXHIBIT 1.**

Further, Congress has authorized Supreme Court review through two procedural mechanisms : appeals and petitions for writ of certiorari. The U.S. Supreme Court has discretion to grant or deny review via a petition for a writ of certiorari ; however, by contrast, **the Court is required to exercise jurisdiction over cases properly before it on direct appeal**. Petitioner filed her direct Appeal and her Petition for Writ of Certiorari together and combined, and both were ‘Denied’ without mandatory Constitutional

considerations. This violates Petitioner's 1st Amendment right to 'Petition her Government for a Redress of Grievances', and her 5th Amendment right to Equal Protections of Law.

Further, from the beginning of this Court's existence, most of its cases were direct appeals, thus, the early decisions of the U.S. Supreme Court emphasized the mandatory nature of Appellate Review.

Further, The Honorable Chief Justice John Marshall first implied that the Court is 'obligated' to take and decide cases meeting the jurisdictional standards as found in *Marbury v. Madison*. The Chief Justice went on to explain in further great detail in *Cohens v. Virginia* : " The judiciary cannot, as the legislature may, avoid a measure because it approaches the confines of the constitution. We cannot pass it by because it is doubtful. With whatever doubts, with whatever difficulties, a case may be attended, we must decide it, if it be brought before us. We have no more right to decline the exercise of jurisdiction which is given, than to usurp that which is not given. The one or the other would be treason to the constitution."

Allegedly because of 'overcrowding' of the Court's docket, and the Supreme Court's determination to exercise the mandatory jurisdiction over appeals cases Congress enacted legislation in **1988** that replaced mandatory Supreme Court direct appellate review, with the optional petition for writ of certiorari in "**many**" but **not all** types of cases.

If the Court's docket supposedly became so overcrowded due to an ever increasing population, the Legislative Branch cannot just step in and say, hey, we are going to fix this Judicial Branch crowded docket issue by denying the people, such as Petitioner, their right to their day in Court to appeal odious decisions from the lower courts. The Law of the Land does not operate in such a discriminatory manner, if the population has increased causing a crowded docket, swear in more Justices to accommodate for the

increased docket load, otherwise, Congress and this Court are violating the 5th Amendment right of the people and Petitioner to have Equal Justice under protections of the Law.

The **1988**, ‘Act to Improve the Administration of Justice’ specifically section 3 of Pub. L. 100 – 352, did not improve the administration of justice at all, in fact, it does the exact opposite of what it purports to do by unconstitutionally allowing the Legislative Branch to control and regulate the Judicial Branch into cherry - picking cases, or class of cases which then deprives ordinary citizens of their day in Court for a Redress of their Grievances. We are in the United States where there is “liberty and justice for all”.

The Supreme Court clarified in *Clarke v. Bazzadone*, 5 U.S. (1 Cranch) 212, 213 (1803), “Congress has made no exception of the present case; and no regulation of congress was necessary to give this court the appellate power. It derives it from the constitution itself”. Thus, this Court has Constitutional authority to hear Petitioner’s case.

In **28 US Code 1253 : Direct appeals from decisions of three – judge courts**, which text is current and accurate as of **June 10, 2025**, states : “**Except as otherwise provided by law, any party may appeal to the Supreme Court from an order granting or denying, after notice and hearing, an interlocutory or permanent injunction in any civil action, suit or proceeding required by an Act of Congress to be heard and determined by a district court of three judges.** (June 25, 1948, ch. 646, 62, Stat. 928.).... **28 US Code 1253** does not clarify if the aforesaid district court must be a State district court, or a Federal district court, or both. As we see in **28 USC 1257 (b)**, “Final Judgments” from the highest court of a State, (which would include State District Courts of Appeals), also includes the District of Columbia Court of Appeals. Thus, State Appellate District Courts are herein intertwined with the Federal District Court of Appeals.

Article III, Section 2, Clause 2 : states; “In all Cases affecting Ambassadors, other public Ministers and Consuls, and those in which a State shall be Party, the supreme Court shall have original Jurisdiction. **In all the other Cases before mentioned, the supreme Court shall have appellate Jurisdiction, both as to Law and Fact,** with such Exceptions, and under such Regulations as the Congress shall make.

In the First instance, **Article III, Section 2, Clause 2 :** defines ‘the Supreme Court’s judicial power shall extend to all cases, in law and equity, arising under this Constitution, the laws of the United States’, ; . . . However, in the Second instance, **Article III, Section 2, Clause 2, shows : Congress has unconstitutionally repudiated the Supreme Court’s judicial power which “shall extend to all cases in law and equity arising under the Constitution and the Laws of the United States”.** Congress of the Legislative Branch, has unconstitutionally given itself tight control over the authority of the Judicial Branch’s Supreme Court by adding “Exceptions” and “Regulations” as the **Congress shall make**”. This deprives people or classes of people, their day in Court.

Congress has a choke hold on the U.S. Supreme Court’s appellate Jurisdiction which Authority has already been granted to them by the Constitution. Congress merely wants to control and regulate what cases can or cannot be appealed to the Supreme Court through their unconstitutional ‘Exceptions Clause’. This is Not Law worthy. Congress has adulterated the constitutional authority of the U.S. Supreme Court and created a loophole so that Congress can control the U.S. Supreme Court’s cases and cherry - pick whose case gets heard and whose doesn’t. This absolutely violates the Separation of Powers between the Three Branches of Government, and it violates the 1st Amendment fundamental right of the Petitioner and the people to Petition their Government for a Redress of Grievances.

Article III, Section 2, Clause 2 : clearly states; “the supreme Court “shall” have appellate Jurisdiction, both as to Law and Fact”, but then states vaguely of some “Exceptions” and even more vaguely of some sort of “Regulations” while never stating what those Exceptions and Regulations are, or might be. This unsound vagueness is antithetical to the protections of the Constitution itself. When the people, such as the Petitioner, are not properly informed of the vague and subversive intentions of Congress who wants to control and regulate the Supreme Court’s authority so that Congress can pick and chose, at their will, who gets justice and who doesn’t, this erodes and weakens the people’s faith in the judiciary even more than it already has been.

Congress has, on occasion, abused its power to regulate Supreme Court jurisdiction to forestall a possible adverse decision from this Court, such as in *Ex parte McCordle*, 74 U.S. (7 Wall.) 506 (1869), which crossed the clearly established boundaries of the Separation of Powers between the Three Branches of Government. Congress cannot constitutionally grant the Supreme Court authority over appellate cases, then usurp powers which Congress does not Lawfully possess in order to seize control of the Supreme Court’s authority and decision making in appellate cases which Congress already granted them authority over. That would mean we do not have a United States Supreme Court – Judicial Branch, we have a United States Supreme Court hijacked and controlled by the Legislative Branch, which is certainly repugnant to the purpose of the Constitution.

Congress also uses unlawful powers to prevent Supreme Court appellate review by limiting the federal court’s jurisdiction over certain cases, and class of cases by way of “jurisdiction stripping”. **Article III, Section 1, of the Constitution states : “The judicial power of the United States, ‘shall’ be vested in one Supreme Court”,** and Congress may from time to time ordain or establish inferior courts. Nowhere does the Constitution

say that judicial power is vested in Congress, or that Congress can dictate whose cases can or cannot be heard by the Supreme Court. The Constitution provides for Supreme Court appellate review, but then Congress, the Legislative Branch, enacts legislation so that it can unlawfully seize control over, and regulate, what the Supreme Court does with their granted appellate jurisdiction authority. The General Public has no way of knowing which case, or classes of cases, would be unconstitutionally “stripped”.

The Separation of powers bars Congress from “jurisdiction stripping” and limiting the Supreme Court’s appellate jurisdiction to hear the “People’s” cases or class of cases because it violates Petitioner’s Constitutionally protected 1st Amendment right to Petition her Government for a Redress of her Grievances and her 5th Amendment right of Equal Protections of Law and due process of Law, and it infringes upon Petitioner’s fundamental right to be heard. The Courts belong to the People, the Bench belongs to the People.

The Supreme Court has at times, struck down Congress’s limitations on its Jurisdiction such as in the case of *United States v. Klein*, 80 U.S. (13 Wall.) 128 (1871). The Supreme Court holds that if the law, “simply denied the right of appeal in a particular class of cases, there could be no doubt that it must be regarded as an exercise of the power of Congress to make ‘such exceptions from the appellate jurisdiction’ as should seem to it expedient”.

However, the Court explained, “the language of the proviso shows plainly that it does not intend to withhold appellate jurisdiction as a means to an end,” requiring the courts to reach a specific outcome in certain cases. Such a law, the Court said, ‘is not an exercise of the acknowledged power of Congress to make exceptions and prescribe regulations to the appellate power,’ and, in enacting the law, **Congress has inadvertently passed the limit which separates the legislative from the judicial power.”**

The act of “Jurisdiction Stripping” by statute which controls the Supreme Court’s ability to hear only certain cases or class of cases on appeal conflicts with the U.S. Constitution in at least three very important ways : **[1]. First, Article VI, Section 2**, clarifies that United States Constitution is the supreme Law of the Land, and all judges in every State are bound thereby, any Thing contrary to the Constitution, notwithstanding. Thus, the Federal Constitution binds the State judges to abide by the Constitution, it also binds the Supreme Court Justices to abide by the Constitution as well because the Justices have taken an oath to uphold, obey, and follow the Constitution as it is written and intended, but Not interpreted, because everyone’s interpretation of the Law can, and will, vary depending on their own ideals and thinking. The Constitution explains itself plainly.

[2]. Second, this Court acknowledges the Constitution is the supreme Law of the Land and the First Amendment of the Constitution guarantees and protects Petitioner’s fundamental right to Petition her Government for a Redress of her Grievances. The First Amendment does Not state a specific Branch or office of the Government Sector, commonly known as the Public Sector, as to where the Petitioner must present her said Petition, therefore, reasonable minds can come to but only one conclusion, and that is, “the ‘government’, shall include ‘all’ levels of government and government controlled organizations”, including all Branches and offices of Government. Petitioner’s Petition for a Redress of her Grievances is included inside Petitioner’s Appeal and ‘Petition’ for Writ of Certiorari, and was submitted to this Court on **November 27, 2024**.

[3]. Third, the Fifth Amendment guarantees and protects Petitioner’s fundamental right to **Equal Protections of Law** as is plainly stated in its Due Process Clause. When Congress, of the Legislative Branch, cherry- picks which cases or class of cases the U.S. Supreme Court of the Judicial Branch can hear on Appeal, it infringes upon, and violates

Petitioner's fundamental right to Due Process of Law and her right to 'Equally' have her case heard just as well as any other case that Congress would allow this Court to hear. Congress's unlawful obtrusive acts violate Petitioner's 1st, and 5th Amendment rights.

Petitioner's Appeal and 'Petition' for Writ of Certiorari is, in fact, a "Petition" for all intents and purposes. It is a Petition for a Redress of Petitioner's Grievances, grievances which stem from the lower court's criminal and unconstitutional acts which require a civil redress and remedy upon proof of Law and Fact. Petitioner's 'Petition' for Writ of Certiorari falls squarely under the Protections of Petitioner's First Amendment absolute fundamental right to Petition our Government for a Redress of Grievances., and her 5th Amendment right to Equal protections of the Law and Due Process right to be heard.

Petitioner 'Petition's this Supreme Court to uphold the Rule of Law, to intervene, and accept Petitioner's Appeal / Writ of Certiorari in order to Redress Petitioner's Grievances and to ; **enter a Decision enforcing Petitioners June 13, 2012 Separation Agreement Contract which is Constitutionally protected by (Article I, Section 10, Clause 1,)** ; **and to enter a Decision to restore her God – Given protected right to the care, custody, maintenance, and companionship with her minor daughter from whom she has been unlawfully separated, (May v. Anderson, 345, U.S. 528, 533 (1953).**

Petitioner Appealed her case to the **Eleventh Judicial District Court of Appeals, a three – judge panel** who initially ruled in Petitioner's favor, but then violated their own Law-of-the-Case by affirming the "family court's" criminal acts and by issuing subsequent unconstitutional 'Decisions' **after** Petitioner went to the authorities about the felony forgery on her official court document that vacated her rights. Among Petitioner's fundamental Constitutionally protected 1st, 4th, 5th, 7th, 8th, 9th, and 14th Amendment rights which have been violated, her 7th Amendment right has been repeatedly violated when

she demanded a trial by jury in the lower courts before the unlawful taking of her property and biological son and daughters. This Court ruled in *SEC v. Jarkesy*, that the 7th Amendment right is inviolate. **EXHIBIT 2. {11th Jud. Dist. Court's cover page.}**

“The Law is well settled that as a general matter the First Amendment prohibits government officials from subjecting an individual to retaliatory actions . . . for speaking out.” Hartman v. Moore, 547 U.S. 250 (2006), . . . City of Houston v. Hill, 482 U.S. 451, 461 (1987). “The Law clearly establishes a right to be free of “intentional and calculated acts of retaliation [by a government actor.]” Anderson v. Creighton, 483 U.S. 635, 639 (1987).

Petitioner submitted her case (twice) to the Ohio Supreme Court who declined to even render an Opinion or Decision in Petitioner's case in order to keep Petitioner's case off the books and not risk exposing the family court corruption that rakes in billions of dollars yearly to the State, to the detriment of the men, women, children, and everyone in the community. The Federal Court in Northern Ohio also dismissed Petitioner's case on the very vague and bogus Res Adjudicata and *Rooker Feldman* Doctrines which can never apply where there is fraud or collusion. *Long v. Shorebank Development Corp., 182 F.3d 548 (C.A. 7th Cir. 1999)*. . . . *In Re Sun Valley Foods Co., 801 F.2d 186 (6th Cir. 1986)*.

The Ohio Supreme Court, and the Federal Court for the Northern District of Ohio intentionally left Petitioner without any Redress or Remedy to be had at the State and lower Federal Court level in order to conceal from the Public the repugnant nature of the ‘family court’ corruption, crimes, and affirmation of such crimes in her case. This violates Petitioner's constitutionally protected fundamental rights, and protected right to a Redress.

Further, this same United States Supreme Court, the Highest Court in the Land, set case precedent which it, itself refuses to follow. When this Court sets case precedent, it is

also bound by its own decisions and *stare decisis* or its decisions are to be deemed hypocritical, nonsensical, and having no foundation or basis in Law. The Justices of the U.S. Supreme Court are in fact, Public Officials, and must adhere to their own case law precedent where it is held that, *“Public officials, whether governors, mayors or police, legislators or judges, who fail to make decisions when they are needed or who do not act to implement decisions when they are made do not fully and faithfully perform the duties of their office.” Scheuer v. Rhodes, 416 U.S. at 241-242 (1974).*

This Court has failed to fully and faithfully perform the duties of their office when it ‘Denied’ Petitioner’s **November 27, 2024** Appeal and Petition for Writ of Certiorari on **May 19, 2025**.... This Court violated Petitioner’s First Amendment right to Petition her Government for a Redress of her Grievances, and her right to be Heard. A Petition for Writ of Certiorari is a ‘Petition’ for Redress of Grievances for all intents and purpose.

This Court violated Petitioner’s Fifth Amendment right to Equal Protections of Law when it permitted Petitioner’s Appeal and Petition for Writ of Certiorari to be cherry-picked among the millions of valid cases that get kicked out of this Court for exposing the Sham Legal Process, pay - for - play, and unjust enrichment going on in the so-called ‘family courts’, that aren’t really courts at all, they are administrative agencies where attorneys don the black robes and fabricate unlawful and unjust Orders, Opinions, and Decisions. These black robed attorneys commit crimes, non-judicial acts, and deprive the people, including Petitioner, of our constitutionally protected, basic fundamental inalienable rights, and do so while acting under color of Law. The above mentioned acts are **Not Judicial Acts** and are absolutely forbidden according to **18 USC 241., & 18 USC 242.**

Petitioner asks this Court,... How did our Nation get to this point in time when a court litigant, (Petitioner), files for a simple Dissolution of Marriage in a Common Pleas

Court, but is then literally forced to endure over (14) years of harassment, torment, torture, and great suffering which caused Petitioner several health problems she never had before she was subjected to the undue burden of being dragged into the Trumbull County, Ohio ‘family court’s’ sham legal process without her consent and while under duress ?

THE ANSWER TO THIS QUESTION IS : Our Constitution has been hijacked by attorneys, almost all of whom have to register with FARA, (Foreign Agents Registration Act). These attorneys have infiltrated our national Court system all the way up to the top cop, our U.S. Supreme Court. These said attorneys, supposedly officers of the Judicial Branch, have infiltrated our Legislative Branch where our Congress, and our Senate, is now disproportionately made up of, at last count, (177) attorneys who fabricate and pass laws that are advantageous to attorneys and other such BAR Association members.

When Congress, and the Courts, even this Court, gives power to attorneys to make and pass laws that are to their own advantage, or permit attorneys to make judicial decisions and write up court Orders and Decisions for judges instead of the judges doing their own core work, Congress and the Supreme Court has then inadvertently unlawfully created a “Fourth Branch of Government” called, “the American Bar Association Branch”.

Petitioners **May 15, 2019**, Federal Complaint, **Case No. 4 :19 - cv - 01097- BYP**, outlined and stated everything which she also emphatically states here and in her Appeal and Petition for Writ of Certiorari, and with hundreds of pages of Exhibits of Proof of her Claim, Petitioner’s case was bounced out of Federal Court simply because her Complaint was “screened” by an attorney who didn’t like the contents of her Complaint, and this “screener” didn’t want the sham legal process exposed should Petitioner prevail.

On **November 27, 2024**, Petitioner submitted her Appeal and Petition for Writ of Certiorari to this U. S. Supreme Court along with over 1,800 pages of Appendices and

Exhibits of proof of her claims. On **March 10, 2025** Petitioner's said case was placed on the Supreme Court's docket. On **April 24, 2025**, Petitioner's case was allegedly distributed for conference to be held on **May 15, 2025**. On **May 19, 2025**, Petitioner received one almost blank page, with the words, "Dear Ms. Morgan, The Court today entered the following order in the above-entitled case: The petition for a writ of certiorari is denied." Petitioner received a two – sentence 'denial' of her Appeal and Petition for Writ of Certiorari. This one – page letter is on Supreme Court of the United States Office of the Clerk letterhead and it is signed : Sincerely, Scott B. Harris, Clerk. There is No signature of any Justice or proof of their decision, (i.e., 5-4, 6-3) on the denial letter. **EXHIBIT 3.**

The U. S. Supreme Court Justices have a duty to make decisions when they are needed, and act to implement decisions when they are made, the Justices must at all times uphold the Rule of Law. The Justices cannot fully and faithfully perform their duties and uphold a constitutionally protected right of Redress to Petitioner when Bar Member attorneys or the Court's Clerks block Petitioner's Petition from ever being seen by the Justices themselves. The Justices never see our cases unless there is some great monetary or 'get famous' agenda behind their review. We have No Justice system at all.

Congress does not follow Judicial standards, their unlawful and intrusive ability to prejudice a case, or class of cases with their bias towards some cases, yet approval of others, conflicts with the Constitution and the Separation of powers, and there is nothing more dangerous to the rights of the people, including Petitioner. Bar member attorneys and Clerk's have been allowed to obstruct Petitioner's pathway to justice, they have blocked her case which was not viewed under the Rule of Law, but was denied review under 'Jungle Law', this is Not in line with the Constitution which guarantees and protects Petitioner's 1st, 4th, 5th, 7th, 8th, 9th, and 14th enumerated rights.

Petitioner has fully demonstrated in her Appeal and Petition for Writ of Certiorari that she has suffered concrete injuries that would certainly be redressed if this Court would grant the relief she seeks, or in the alternative, the relief which this Court would deem appropriate. *Duke Power Co. v. Carolina Environmental Study Group*, 438 U.S. 59 (1978). Petitioner's redressability would exist even if her requested judicial relief would not completely redress her concrete injuries.. *Massachusetts v. EPA*, 549 U.S. 497 (2007).

Further, the United States Constitution is the supreme Law of the Land according to **Article VI, Section 2**, therefore, Petitioner's fundamental constitutionally protected First Amendment right to Petition her Government for a Redress of her Grievances, and her Fifth Amendment protected right to Equal Protections of Law were violated, infringed upon, and trespassed upon by the Justices of United States Supreme Court who permitted BAR association members that work in the Justice's office's to review Petitioner's case and surreptitiously ultimately deny Petitioner her Constitutionally protected right to Appeal and Petition this U.S. Supreme Court Government Court for a Redress of her Grievances.

It is crystal clear that Petitioner's case has been rigged from **June 13, 2012**, when the family court officers decided they would vacate and breach Petitioner's Separation Agreement contract by way of a felony forgery in violation of the Constitution's Laws of Contract. Petitioner's minor children were then taken from her without Notice or right to be heard because she refused to remain silent about the family court actors odious unconstitutional acts. The Ohio Courts have failed to fully and faithfully perform the duty of their office when they refused to render any Decision in Petitioner's case as needed, and failed to act to implement decisions that were already made, such as enforcing Petitioner's Separation Agreement Contract, and restoring Petitioner's custody of her minor daughter. Petitioner has been deprived of any Court Redress. *Scheuer v. Rhodes*, 416

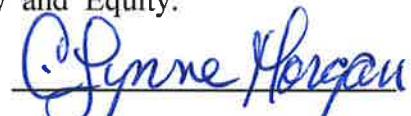
U.S. at 241-242 (1974). The Respondent in this case has never replied to Petitioner's Appeal and Petition for Writ of Certiorari because he already knows this case is rigged.

IN CONCLUSION, This Court has, at times before, Struck Down the limits Congress has placed upon its appellate decision making, especially when it infringes upon, or deprives a litigant of a protected right. As such, Petitioner requests in 'Good Faith' that the Justices of this Court would venerate what Petitioner's Appeal and Petition for Writ of Certiorari is speaking to them. Petitioner pleads that she has no other path in which to obtain the civil Redress she seeks for the unconstitutional and criminal actions of the lower court's officers which led Petitioner to Petition for this Courts intervention. If this Court deprives Petitioner of her Constitutionally protected right to Redress for her Grievances, and her right to Equal Protections of the Law, then the Justices of this Court will have committed Treason against the Constitution itself. The Justices cannot War with the Constitution without violating the undertaking of their oath to uphold it.

{No Costs or Fees Shall Be Taxed to the Petitioner for She is the Injured Party.}

WHEREFORE, for the reasons as stated above, Petitioner Petitions this Supreme Court for a Rehearing of her November 27, 2024 Appeal and Petition for Writ of Certiorari. Petitioner's First and Fifth Amendment rights must not be infringed nor trespassed upon by Congress in this case. Petitioner seeks this Court's intervention to issue a decision to uphold and enforce Petitioner's June 13, 2012 Constitutionally Protected Separation Agreement Contract ; and for the enforcement of her Constitutionally protected right to the care, custody, and companionship with her minor daughter ; and for any award of damages and compensation to be determined by this Court ; and for any other relief this Honorable Court shall deem appropriate and necessary in Law and Equity.

With Respect for the United States Constitution, I, Sign



CERTIFICATE OF GOOD FAITH PRESENTED BY PETITIONER

I, Petitioner, Carol Lynne Morgan, *pro se*, Certify that this Petition for Rehearing is presented in 'good faith' and not for delay as specified in **Rule 44. (1)** of the Rules of this U.S. Supreme Court.

CERTIFIED STATEMENT OF LIMITED GROUNDS

Petitioner Certifies that the grounds for her Rehearing follow **Rule 44. (2)** of the Rules of this U.S. Supreme Court ; " but its grounds shall be limited to intervening circumstances of a substantial or controlling effect or to other substantial grounds not previously presented." This Petition for Rehearing is submitted on the grounds that U.S. Supreme Court intervention is paramount in order to safeguard, preserve, and enforce Petitioner's substantial fundamental Constitutionally protected rights which were violated.

CERTIFICATION

I, Petitioner, furthermore affirm that I have attached an original copy of this Certificate of 'Good Faith', and Certified Statement of Limited Grounds, to the back of Petitioner's Petition for Rehearing, along with the required 10- plus 1. copies required for *informa pauperis* Petitioners, and I certify that I timely Mailed it by First Class Priority Mail on **August 23, 2025** to the United States Supreme Court, and to every named individual listed in Petitioner's Certificate of Service.

Respectfully Submitted,

August 23, 2025


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morgansheart88@gmail.com

No. _____

In the
Supreme Court of the United States

Carol Lynne Morgan
Petitioner,

ON APPEAL FROM THE
OHIO SUPREME COURT

v.

APPEALED FROM

Leby H. Sassy
Respondent,

THE ELEVENTH JUDICIAL
COURT OF APPEALS

PETITIONER'S CORRECTED FILING

On Appeal and Petition for Writ of Certiorari to The United States Supreme Court
From The 11th Judicial Court of Appeals Case No. 2023 -TR- 0048 (Affirmed). Further
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**APPEAL AND PETITION FOR WRIT OF CERTIORARI
ORAL ARGUMENT RESPECTFULLY REQUESTED**

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Counsel for Leby H. Sassy

EXHIBIT 1.

APR 09 2024

IN THE COURT OF APPEALS OF OHIO
ELEVENTH APPELLATE DISTRICT
TRUMBULL COUNTY

TRUMBULL COUNTY, OH
KAREN INFANTE ALLEN, CLERK

LEBY SASSYA,

Plaintiff-Appellee,

- v -

CAROL LYNNE MORGAN
(f.k.a. SASSYA),

Defendant-Appellant.

CASE NO. 2023-T-0048

Civil Appeal from the
Court of Common Pleas,
Domestic Relations Division

Trial Court No. 2011 DS 00293

OPINION

Decided: April 9, 2024
Judgment: Affirmed

Elise M. Burkey, Burkey, Burkey & Scher Co., L.P.A., 200 Chestnut Avenue, N.E., Warren, OH 44483 (For Plaintiff-Appellee).

Carol Lynne Morgan, pro se, 878 Indianola Road, Boardman, OH 44512 (Defendant-Appellant).

MATT LYNCH, J.

{¶1} Defendant-appellant, Carol Lynne Morgan f.k.a. Sassy, appeals the Judgment of the Trumbull County Court of Common Pleas, Domestic Relations Division, granting plaintiff-appellee, Leby Sassy's, Motion to Modify Order of October 24, 2017. For the following reasons, we affirm the decision of the court below.

{¶2} On August 30, 2011, the parties jointly filed a Petition for Dissolution of their marriage. The matter was subsequently converted to an action for divorce. On July 11, 2013, a Decree of Divorce was issued and, on December 19, 2014, a Judgment Order



2023 TR
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EXHIBIT 2.

**Additional material
from this filing is
available in the
Clerk's Office.**

CERTIFICATE OF SERVICE

I, do hereby Certify and Declare, that a true and correct copy of the Original, PETITIONER'S PETITION FOR REHEARING, has been sent by United States Postal First Class Mail within (3) calendar days from this date and in accordance with Rule 29., on August 23rd in the year 2025, to the following :

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30 E. Broad Street, 14th Floor
Columbus, Ohio 43215

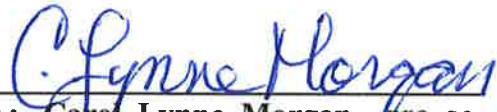
House Judiciary Committee
Chairman Jim Jordan
2138 Rayburn House Bldg.
Washington D.C. 20515

U.S. Attorney General
Ms. Pam Bondi
950 Pennsylvania Avenue N.W.
Washington, D.C. 20530

To the Office of the President of The
United States ; Donald J. Trump
1600 Pennsylvania Avenue N.W.
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To the Office of the Vice President of
The United States ; JD Vance
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U.S. Department of State
Office of Inspector General
1500 Pennsylvania Avenue N.W.
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