

25-6148 **ORIGINAL**

No. \_\_\_\_\_

Supreme Court, U.S.  
FILED

NOV 12 2025

OFFICE OF THE CLERK

IN THE  
SUPREME COURT OF THE UNITED STATES

Jehan Semper, Pro Se  
PETITIONER

vs

Yellen/Bessent, et al.  
RESPONDENT(S)

PETITION FOR A WRIT OF CERTIORARI TO

United States Court of Appeals for the Tenth Circuit

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED  
Constitutional and Civil Rights

District Court

1. **District Court FAILS to Consider Indigent Pro Se Plaintiff's Filings and Motions**

**Whatsoever.** Is it a violation of rights protected by the constitution, civil rights, right of equitable access to justice and/or error, abuse of discretion, arbitrary act, capricious act or otherwise improper act or decision when the district court refused to consider indigent pro se Plaintiff's filings and motions by way of Romero's (116) *[Appendix B.2.3]* which instructed the clerks to: (a) cease filing indigent pro se Plaintiff's filings and documents as active filings to be considered by the court; and (b) to instead lodge the filings as inactive, not to be considered whatsoever. *See Context of Questions for detail.*

2. **Delay and Thus Denial of Justice.** Is it a violation of rights protected by the constitution, civil rights, right of equitable access to justice and/or error, abuse of discretion, arbitrary act, capricious act or otherwise improper act or decision when the district court inexplicably delayed for nearly 3 years in the (a) termination of Ogden and Weber defendant(s); and (b) the dismissal of Plaintiff's IFP granted complaint for lack of jurisdiction? *See Context of Questions for detail.*

3. Did the district court otherwise err, abuse its discretion, act arbitrarily and/or capriciously or otherwise act improperly in this case?

Appeals Court

4. **Appeals Courts FAILS to Consider Plaintiff/Appellant's Motion for Reconsideration/Rehearing.** Is it a violation of rights protected by the constitution, civil rights, right of equitable access to justice and/or error, abuse of discretion, arbitrary act, capricious act or otherwise improper act or decision when the appeals court FAILED to

consider, and disposed of, indigent pro se Plaintiff's Motion for Reconsideration/Rehearing with no explanation whatsoever? *See Context of Questions for detail.*

5. Did the appeals court otherwise err, abuse its discretion, act arbitrarily and/or capriciously or otherwise act improperly in this case?

## **LIST OF PARTIES**

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

## **RELATED CASES**

Semper v Yellen/Bessent, et al., No. 25-4022, US Court of Appeals for the Tenth Circuit. Mandate entered Aug. 25, 2025. *See Appendix A.*

Semper v Yellen/Bessent, et al., No. 22-cv-00070, US District Court for District of Utah. Judgment entered Feb. 20, 2025. *See Appendix B.*

## **IRS210461F Equal Employment Opportunity Complaint**

- (a) Final Agency Decision and Order, Mar. 14, 2022. *See Appendix C.*
- (b) IRS210461F Compensation Order, Jun. 6, 2022. *See Appendix C.*
- (c) 2025004132 Complainant Petition for Enforcement of IRS210461F Final Agency Decision, filed Aug. 11, 2025; decision pending. *See Appendix C.*

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3. Complaints and Motion(s) to the District Court

3.1 10/16/2023 (ECF 128, et seq) Plaintiff's Motion to Expedite Settlement Conference \*Pacer

3.2 12/5/2023 (ECF 138) Plaintiff's Tenth Affidavit aka the "IRS210461F Culpability Dossier" which, within a mere approximate 100 PDF(s), supports, corroborates and proves Plaintiff's claims and allegations accepted for investigation in IRS210461F, but were deliberately "hidden" in plain sight while mired in 12,000+ superfluous PDF(s) for which Yellen FAILED to transmit the searchable text layer, a near fatal discovery abuse against indigent pro se Plaintiff/Appellant which could only be overcome by prohibitively expensive third party vendors of OCR services and/or indigent pro se Plaintiff/Appellant's professional knowledge and expertise of which Yellen was clearly ignorant. \*Pacer

3.3 12/11/2023 (ECF 139, et seq) Plaintiff Motion for Sanctions 33b

3.4 1/2/2024 (ECF 143, et seq) Plaintiff's Thirteenth Affidavit and Exhibits describing and documenting in detail Yellen's discovery abuses. \*Pacer

3.5 2/7/2024 (ECF 153, et seq) Plaintiff's Thirteenth Affidavit Supplemental \*Pacer

3.6 12/9/2024 (ECF 205, et seq) Plaintiff Objection to (ECF 204) Report and Recommendations \*Pacer

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## TABLE OF AUTHORITIES CITED

### **Statutes and Rules**

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IN THE  
SUPREME COURT OF THE UNITED STATES  
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

**OPINIONS BELOW**

[X] For cases from federal courts: The opinion of the United States court of appeals appears at **Appendix A** to the petition and is [X] reported at **Appendix A.2.1**.

The opinion of the United States district court appears at **Appendix B** to the petition and is [X] reported at **Appendix B.2.1**.

**JURISDICTION**

[X] For cases from federal courts: The date on which the United States Court of Appeals decided my case was **July 22, 2025**.

[X] A timely petition for rehearing was denied by the United States Court of Appeals on the following date: **August 25, 2025**, and a copy of the order denying rehearing appears at **Appendix A.2.2**.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

**CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

**1. The Fourteenth Amendment to the Constitution, et seq.**

*“All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they*

*reside. 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."*

**2. Title VII of the Civil Rights Act of 1964; 42 USC § 2000e, et seq.**

*"Unlawful employment practices*

*(a) Employer practices*

*It shall be an unlawful employment practice for an employer—*

*(1) to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's race, color, religion, sex, or national origin; or*

*(2) to limit, segregate, or classify his employees or applicants for employment in any way which would deprive or tend to deprive any individual of employment opportunities or otherwise adversely affect his status as an employee, because of such individual's race, color, religion, sex, or national origin."*

**3. 18 USC Civil Rights §241, §242, §245, §249, et seq.**

**18 USC § 241 - Conspiracy against rights**

*"If two or more persons conspire to injure, oppress, threaten, or intimidate any person in any State, Territory, Commonwealth, Possession, or District in the free exercise or enjoyment of any right or privilege secured to him by the Constitution or laws of the United States, or because of his having so exercised the same; or*

*If two or more persons go in disguise on the highway, or on the premises of another, with intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured—*

*They shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, they shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death."*

**18 USC § 242 - Deprivation of rights under color of law**

*"Whoever, under color of any law, statute, ordinance, regulation, or custom, willfully subjects any person in any State, Territory, Commonwealth, Possession, or District to the deprivation of any rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pains, or penalties, on account of such person being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death."*

#### 18 USC § 245 - Federally protected activities

*"(b) Whoever, whether or not acting under color of law, by force or threat of force willfully injures, intimidates or interferes with, or attempts to injure, intimidate or interfere with—*

*(1) any person because he is or has been, or in order to intimidate such person or any other person or any class of persons from—*

*...  
(C) applying for or enjoying employment, or any perquisite thereof, by any agency of the United States;*

*...  
(2) any person because of his race, color, religion or national origin and because he is or has been—*

*...  
(C) applying for or enjoying employment, or any perquisite thereof, by any private employer or any agency of any State or subdivision thereof, or joining or using the services or advantages of any labor organization, hiring hall, or employment agency;*

*...  
(4) any person because he is or has been, or in order to intimidate such person or any other person or any class of persons from—*

*(A) participating, without discrimination on account of race, color, religion or national origin, in any of the benefits or activities described in subparagraphs (1)(A) through (1)(E) or subparagraphs (2)(A) through (2)(F); or*

*(B) affording another person or class of persons opportunity or protection to so participate; or*

*(5) any citizen because he is or has been, or in order to intimidate such citizen or any other citizen from lawfully aiding or encouraging other persons to participate, without discrimination on account of race, color, religion or national origin, in any of the benefits or activities described in subparagraphs (1)(A) through (1)(E) or subparagraphs (2)(A) through (2)(F), or participating lawfully in speech or peaceful assembly opposing any denial of the opportunity to so participate—*

*shall be fined under this title, or imprisoned not more than one year, or both; and if bodily injury results from the acts committed in violation of this section or if such acts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire shall be fined under this title, or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title or imprisoned for any term of years or for life, or both, or may be sentenced to death.”*

#### 18 USC § 249 - Hate crime acts

*“(a) In General.—*

*(1) Offenses involving actual or perceived race, color, religion, or national origin.—Whoever, whether or not acting under color of law, willfully causes bodily injury to any person or, through the use of fire, a firearm, a dangerous weapon, or an explosive or incendiary device, attempts to cause bodily injury to any person, because of the actual or perceived race, color, religion, or national origin of any person—*

*(A) shall be imprisoned not more than 10 years, fined in accordance with this title, or both; and*

*(B) shall be imprisoned for any term of years or for life, fined in accordance with this title, or both, if—*

*(i) death results from the offense; or*

*(ii) the offense includes kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill.*

*(2) Offenses involving actual or perceived religion, national origin, gender, sexual orientation, gender identity, or disability.—*

*(A) In general.—Whoever, whether or not acting under color of law, in any circumstance described in subparagraph (B) or paragraph (3), willfully causes bodily injury to any person or, through the use of fire, a firearm, a dangerous weapon, or an explosive or incendiary device, attempts to cause bodily injury to any person, because of the actual or perceived religion, national origin, gender, sexual orientation, gender identity, or disability of any person—*

(i) shall be imprisoned not more than 10 years, fined in accordance with this title, or both; and

(ii) shall be imprisoned for any term of years or for life, fined in accordance with this title, or both, if—

(I) death results from the offense; or

(II) the offense includes kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill.

(B) Circumstances described.—For purposes of subparagraph (A), the circumstances described in this subparagraph are that—

(i) the conduct described in subparagraph (A) occurs during the course of, or as the result of, the travel of the defendant or the victim—

(I) across a State line or national border; or

(II) using a channel, facility, or instrumentality of interstate or foreign commerce;

(ii) the defendant uses a channel, facility, or instrumentality of interstate or foreign commerce in connection with the conduct described in subparagraph (A);

(iii) in connection with the conduct described in subparagraph (A), the defendant employs a firearm, dangerous weapon, explosive or incendiary device, or other weapon that has traveled in interstate or foreign commerce; or

(iv) the conduct described in subparagraph (A)—

(I) interferes with commercial or other economic activity in which the victim is engaged at the time of the conduct; or

(II) otherwise affects interstate or foreign commerce.

(3) Offenses occurring in the special maritime or territorial jurisdiction of the United States.—

Whoever, within the special maritime or territorial jurisdiction of the United States, engages in conduct described in paragraph (1) or in paragraph (2)(A) (without regard to whether that conduct occurred in a circumstance described in paragraph (2)(B)) shall be subject to the same penalties as prescribed in those paragraphs.

(4) Guidelines.—

All prosecutions conducted by the United States under this section shall be undertaken pursuant to guidelines issued by the Attorney General, or the designee of the Attorney General, to be included in the United States Attorneys' Manual that shall establish neutral and objective criteria for determining whether a crime was committed because of the actual or perceived status of any person.

(5) Lynching.—

Whoever conspires to commit any offense under paragraph (1), (2), or (3) shall, if death or serious bodily injury (as defined in section 2246 of this title) results from the offense, be imprisoned for not more than 30 years, fined in accordance with this title, or both.

(6) Other conspiracies.—

Whoever conspires to commit any offense under paragraph (1), (2), or (3) shall, if death or serious bodily injury (as defined in section 2246 of this title) results from

*the offense, or if the offense includes kidnapping or an attempt to kidnap, aggravated sexual abuse or an attempt to commit aggravated sexual abuse, or an attempt to kill, be imprisoned for not more than 30 years, fined in accordance with this title, or both.*

*(b) Certification Requirement.—*

*(1) In general.—No prosecution of any offense described in this subsection may be undertaken by the United States, except under the certification in writing of the Attorney General, or a designee, that—*

*(A) the State does not have jurisdiction;*

*(B) the State has requested that the Federal Government assume jurisdiction;*

*(C) the verdict or sentence obtained pursuant to State charges left demonstratively unvindicated the Federal interest in eradicating bias-motivated violence; or*

*(D) a prosecution by the United States is in the public interest and necessary to secure substantial justice.*

*(2) Rule of construction.—*

*Nothing in this subsection shall be construed to limit the authority of Federal officers, or a Federal grand jury, to investigate possible violations of this section.*

*(c) Definitions.—In this section—*

*(1) the term “bodily injury” has the meaning given such term in section 1365(h)(4) of this title, but does not include solely emotional or psychological harm to the victim;*

*(2) the term “explosive or incendiary device” has the meaning given such term in section 232 of this title;*

*(3) the term “firearm” has the meaning given such term in section 921(a) of this title;*

*(4) the term “gender identity” means actual or perceived gender-related characteristics; and*

*(5) the term “State” includes the District of Columbia, Puerto Rico, and any other territory or possession of the United States.*

*(d) Statute of Limitations.—*

*(1) Offenses not resulting in death.—*

*Except as provided in paragraph (2), no person shall be prosecuted, tried, or punished for any offense under this section unless the indictment for such offense is found, or the information for such offense is instituted, not later than 7 years after the date on which the offense was committed.*

*(2) Death resulting offenses.—*

*An indictment or information alleging that an offense under this section resulted in death may be found or instituted at any time without limitation.*

*(e) Supervised Release.—*

*If a court includes, as a part of a sentence of imprisonment imposed for a violation of subsection (a), a requirement that the defendant be placed on a term of supervised release after imprisonment under section 3583, the court may order,*

*as an explicit condition of supervised release, that the defendant undertake educational classes or community service directly related to the community harmed by the defendant's offense.*

**4. Code of Federal Regulations 29 CFR §1614, et seq.**

Equal Employment Opportunity Remedies and Enforcement  
29 CFR §1614.501, §1614.502, §1614.503, §1614.504

§ 1614.501 Remedies and relief.

*"(a) When an agency, or the Commission, in an individual case of discrimination, finds that an applicant or an employee has been discriminated against, the agency shall provide full relief which shall include the following elements in appropriate circumstances:*

*(1) Notification to all employees of the agency in the affected facility of their right to be free of unlawful discrimination and assurance that the particular types of discrimination found will not recur;*

*(2) Commitment that corrective, curative or preventive action will be taken, or measures adopted, to ensure that violations of the law similar to those found will not recur;*

*(3) An unconditional offer to each identified victim of discrimination of placement in the position the person would have occupied but for the discrimination suffered by that person, or a substantially equivalent position;*

*(4) Payment to each identified victim of discrimination on a make whole basis for any loss of earnings the person may have suffered as a result of the discrimination; and*

*(5) Commitment that the agency shall cease from engaging in the specific unlawful employment practice found in the case."*

§ 1614.502 Compliance with final Commission decisions.

*"(a) Relief ordered in a final Commission decision is mandatory and binding on the agency except as provided in this section. Failure to implement ordered relief shall be subject to judicial enforcement as specified in § 1614.503(g)."*

§ 1614.503 Enforcement of final Commission decisions.

*"(a) Petition for enforcement. A complainant may petition the Commission for enforcement of a decision issued under the Commission's appellate jurisdiction. The petition shall be submitted to the Office of Federal Operations. The petition*

*shall specifically set forth the reasons that lead the complainant to believe that the agency is not complying with the decision.*

*(b) Compliance. On behalf of the Commission, the Office of Federal Operations shall take all necessary action to ascertain whether the agency is implementing the decision of the Commission. If the agency is found not to be in compliance with the decision, efforts shall be undertaken to obtain compliance."*

§ 1614.504 Compliance with settlement agreements and final action.

*"(a) Any settlement agreement knowingly and voluntarily agreed to by the parties, reached at any stage of the complaint process, shall be binding on both parties. Final action that has not been the subject of an appeal or civil action shall be binding on the agency. If the complainant believes that the agency has failed to comply with the terms of a settlement agreement or decision, the complainant shall notify the EEO Director, in writing, of the alleged noncompliance within 30 days of when the complainant knew or should have known of the alleged noncompliance. The complainant may request that the terms of settlement agreement be specifically implemented or, alternatively, that the complaint be reinstated for further processing from the point processing ceased.*

*(b) The agency shall resolve the matter and respond to the complainant, in writing. If the agency has not responded to the complainant, in writing, or if the complainant is not satisfied with the agency's attempt to resolve the matter, the complainant may appeal to the Commission for a determination as to whether the agency has complied with the terms of the settlement agreement or decision. The complainant may file such an appeal 35 days after he or she has served the agency with the allegations of noncompliance, but must file an appeal within 30 days of his or her receipt of an agency's determination. The complainant must serve a copy of the appeal on the agency and the agency may submit a response to the Commission within 30 days of receiving notice of the appeal."*

## CONTEXT OF QUESTIONS

*This petition presents questions about (a) constitutional rights, civil rights, equitable access to justice; delay and thus denial of justice.*

### District Court

#### 1. District Court FAILS to Consider Indigent Pro Se Plaintiff's Filings and Motions

**Whatsoever.** The district court refused to consider Plaintiff's filings by way of Magistrate Romero's (116) *[Appendix B.2.3]* which instructed the clerks to: (a) cease filing indigent pro se Plaintiff's filings and documents as active filings to be considered by the court; and (b) to instead lodge the filings as inactive, not to be considered whatsoever. Romero's (116) *[Appendix B.2.3]* further uttered that the district court would eventually consider indigent pro se Plaintiff's filings *after* indigent pro se Plaintiff's motions *filed previous to Romero's (116) [Appendix B.2.3]* were adjudicated, but the district court FAILED to "make good" on the "future consideration" aspect of Romero (116) *[Appendix B.2.3]* and did NOT consider any of indigent pro se Plaintiff's filings lodged after Romero's (116) *[Appendix B.2.3]* whatsoever. The most egregious example(s) of the district court's FAILURE to "make good" on the "future consideration" aspect of Romero's (116) *[Appendix B.2.3]* would be: (a) the FAILURE to adjudicate indigent pro se Plaintiff's Motion for Sanctions (139) *[Appendix B.3.3, B.3.4, B.3.5]* which alleges discovery abuses by Yellen attorney Romney; and (b) Romero's (116) *[Appendix B.2.3]* was weaponized and manipulated by the clerks to obstruct indigent pro se Plaintiff's timely responses to

orders and defendant(s) filings as described in detail within Plaintiff/Appellant Motion for Reconsideration/Rehearing [*Appendix A.3.2*].

2. **Delay and Thus Denial of Justice.** The district court inexplicably delayed in its: (a) termination of Ogden and Weber defendants on the basis of “no right of private action” for 18 USC “colour of law” violations; and (b) dismissal of indigent pro se Plaintiff's IFP granted complaint for lack of jurisdiction after nearly 3 years of inexcusable delay and obstructive reluctance to adjudicate indigent pro se Plaintiff's IFP granted complaint–decision(s) the district court could have issued within mere weeks of indigent pro se Plaintiff's May 2022 filing of the original complaint.

### **Appeals Court**

3. **Appeals Courts FAILS to Consider Plaintiff/Appellant's Motion for Reconsideration/Rehearing.** The appeals court affirmed district court's decision; and disposed of Plaintiff's Motion for Reconsideration/Rehearing with no explanation whatsoever, although the Motion for Reconsideration/Rehearing specifically asked the appeals court to insist the district court adjudicate Plaintiff's Motion for Sanctions (139) [*Appendix B.3.3, B.3.4, B.3.5*] alleging discovery abuses by Yellen attorney Romney; and argues/asserts as direct response to the appeals court affirmation order that: (a) Romero's (116) [*Appendix B.2.3*] uttered that the district court would eventually consider Plaintiff's motions filed after Romero's (116) [*Appendix B.2.3*], but the district court FAILED to “make good” on this aspect of Romero's (116) [*Appendix B.2.3*]; and (b) indigent pro se Plaintiff's cognizable and persistent constructive objection(s) to

Romero's (116) *[Appendix B.2.3]* is sufficient basis for the appeals court to insist the district court adjudicate Plaintiff's Motion for Sanctions (139) *[Appendix B.3.3, B.3.4, B.3.5]*.

#### **STATEMENT OF THE CASE**

(a) The district court refused to consider Plaintiff's filings by way of Magistrate Romero's (116) *[Appendix B.2.3]* which instructed the clerks to: (a) cease filing indigent pro se Plaintiff's filings and documents as active filings to be considered by the court; and (b) to instead lodge the filings as inactive, not to be considered whatsoever. Romero's (116) *[Appendix B.2.3]* further uttered that the district court would eventually consider indigent pro se Plaintiff's filings after indigent pro se Plaintiff's motions filed previous to Romero's (116) *[Appendix B.2.3]* were adjudicated, but the district court FAILED to "make good" on the "future consideration" aspect of Romero (116) *[Appendix B.2.3]* and did NOT consider any of indigent pro se Plaintiff's filings lodged after Romero's (116) *[Appendix B.2.3]* whatsoever. Plaintiff constructively and persistently objected to Romero's (116) *[Appendix B.2.3]* and the malfeasant exploitation and manipulation of Romero's (116) *[Appendix B.2.3]*. The most egregious example(s) of the district court's FAILURE to "make good" on the "future consideration" aspect of Romero's (116) *[Appendix B.2.3]* would be: (a) the FAILURE to adjudicate indigent pro se Plaintiff's Motion for Sanctions (139) *[Appendix B.3.3, B.3.4, B.3.5]* which alleges discovery abuses by Yellen attorney Romney; and (b) Romero's (116) *[Appendix B.2.3]* was weaponized and manipulated by the clerks to obstruct indigent pro se Plaintiff's timely responses to

orders and defendant(s) filings as described in detail within Plaintiff/Appellant Motion for Reconsideration/Rehearing [*Appendix A.3.2*].

(b) The district court inexplicably delayed in its: (a) termination of Ogden and Weber defendants on the basis of “no right of private action” for 18 USC “colour of law” violations; and (b) dismissal of indigent pro se Plaintiff's IFP granted complaint for lack of jurisdiction after nearly 3 years of inexcusable delay and obstructive reluctance to adjudicate indigent pro se Plaintiff's IFP granted complaint–decision(s) the district court could have issued within mere weeks of indigent pro se Plaintiff's May 2022 filing of the original complaint.

(c) The appeals court affirmed district court's decision; and disposed of Plaintiff's Motion for Reconsideration/Rehearing with no explanation whatsoever, although the Motion for Reconsideration/Rehearing specifically asked the appeals court to insist the district court adjudicate Plaintiff's Motion for Sanctions (139) [*Appendix B.3.3, B.3.4, B.3.5*] alleging discovery abuses by Yellen attorney Romney; and argues/asserts as direct response to the appeals court affirmation order that: (a) Romero's (116) [*Appendix B.2.3*] uttered that the district court would eventually consider Plaintiff's motions filed after Romero's (116) [*Appendix B.2.3*], but the district court FAILED to “make good” on this aspect of Romero's (116) [*Appendix B.2.3*]; and (b) indigent pro se Plaintiff's cognizable and persistent constructive objection(s) to Romero's (116) [*Appendix B.2.3*] is sufficient basis for the appeals court to insist the district court adjudicate Plaintiff's Motion for Sanctions (139) [*Appendix B.3.3, B.3.4, B.3.5*].

## REASONS FOR GRANTING THE PETITION

- (a) The events described within indigent pro se Plaintiff's IFP granted complaint are true and factual; and
- (b) Romero's (116) [*Appendix B.2.3*] uttered that the district court would eventually consider and thus adjudicate Plaintiff's motions filed after Romero's (116) [*Appendix B.2.3*], but the district court FAILED to "make good" on this aspect of Romero's (116) [*Appendix B.2.3*]; and
- (c) The allegations and claims uttered within pro se Plaintiff's Motion for Sanctions (139) [*Appendix B.3.3, B.3.4, B.3.5*] are true, factual, timely filed/asserted and merit consideration and adjudication; and
- (d) as acknowledged by the appeals court affirmation order, the district court is the venue for adjudication of discovery abuses alleged as occurring within the adjudication of a complaint heard within the district court and thus the district court must "make good" on its uttering that the district court would eventually consider and adjudicate Plaintiffs Motion for Sanction (139) filed after Romero's (116) [*Appendix B.2.3*]; and
- (e) the district court's FAILURE to consider and thus adjudicate Plaintiffs Motion for Sanctions (139) [*Appendix B.3.3, B.3.4, B.3.5*] reveals Romero's (116) [*Appendix B.2.3*] as an attempt to "silence" indigent pro se Plaintiff; and
- (f) the district court's FAILURE to "make good" on the "future consideration" aspect of Romero's (116) [*Appendix B.2.3*] is an error, abuse of discretion, arbitrary act, capricious act or otherwise improper act or decision which must be corrected; and
- (g) the appeals court's FAILURE to consider and thus adjudicate pro se Plaintiffs Motion for Reconsideration/Rehearing is an error, abuse of discretion, arbitrary act, capricious act or otherwise improper act or decision which must be corrected; and

- (h) the district court and the appeals court FAILED in their duty to reasonably adjudicate pro se Plaintiff's motions; and
- (i) the district court and the appeals court erred, abused its discretion, acted arbitrarily and/or capriciously, unreasonably or otherwise acted improperly, failed in its duty; and
- (j) the district court and the appeals court were unreasonable in their decisions; and
- (k) the unreasonable acts and failures to act of the district court and the appeals court delayed and thus denied justice to indigent pro se Plaintiff; and
- (l) indigent pro se Plaintiff is entitled to equitable access to justice and thus entitled to timely, expeditious adjudication of her complaint, motions and filings.

### **CONCLUSION**

The petition for a writ of certiorari should be granted.

Respectfully submitted,

/s/ Jehan Semper, Pro Se

11/12/2025