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OFFICE OF THE CLERK  
SUPREME COURT, U.S.

IN THE

SUPREME COURT OF THE UNITED STATES

Lynette Cooper — PETITIONER  
(Your Name)

vs.

City of Baltimore et al — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

U.S. Court of Appeals for the Fourth Circuit

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

**PETITION FOR WRIT OF CERTIORARI**

Lynette Cooper

(Your Name)

600 Light Street, Apt 429

(Address)

Balto., MD 21230

(City, State, Zip Code)

410-513-4280

(Phone Number)

### Questions Presented

1. Did the Court of Appeals violate the Petitioner's **Due Process** rights by affirming the District Court's *sua sponte* dismissal of a detailed civil RICO complaint as "delusional", despite the complaint being supported by **medically verified evidence of chemical battery delivered via water & HVAC systems**, specific documentation of **\$50K SSA imposter fraud**, alleged subsequent **murder to key witnesses**-thereby substituting judicial fact-finding for legal review and denying discovery?
2. Did the lower courts err in dismissing claims under **42 U.S.C. 1983 & 1985** when the most recent acts of the Enterprise utilized a state-level administration body (**Baltimore County Housing**) and **digital fraud (fake email)** to wrongfully revoke the Petitioner's housing voucher immediately following a family hospitalization due to chemical exposure, demonstrating an ongoing conspiracy to deprive the Petitioner of basic rights through economic and physical duress.
3. Did the Court of Appeals improperly fail to apply the requisite liberal pleading standard for **pro se litigants** who are demonstrably suffering from **documented physical and cognitive impairment** resulting directly from the chemical battery and continuous racketeering activity alleged against the Enterprise, effectively denying the Petitioner access to the courts?
4. Did the lower courts err in failing to recognize a continuing pattern of racketeering activity under **18 U.S.C. 1962 (c)**, where the alleged Enterprise, comprising high-level government officials, escalated its criminal conduct **after dismissal** to include the **alleged murder of an Election Supervisor and a Police Officer** to conceal electoral fraud, demonstrating "open and persistent resistance to laws" that requires immediate intervention by this Court?

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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**

[ ] For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix A to the petition and is

[ ] reported at \_\_\_\_\_; or,  
[ ] has been designated for publication but is not yet reported; or,  
[X] is unpublished.

The opinion of the United States district court appears at Appendix B to the petition and is

[ ] reported at \_\_\_\_\_; or,  
[X] has been designated for publication but is not yet reported; or,  
[ ] is unpublished.

[ ] For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix \_\_\_\_\_ to the petition and is

[ ] reported at \_\_\_\_\_; or,  
[ ] has been designated for publication but is not yet reported; or,  
[ ] is unpublished.

The opinion of the \_\_\_\_\_ court appears at Appendix \_\_\_\_\_ to the petition and is

[ ] reported at \_\_\_\_\_; or,  
[ ] has been designated for publication but is not yet reported; or,  
[ ] is unpublished.

1.

## JURISDICTION

[ ] For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was September 2, 2025.

[ ] No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: September 30, 2025, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

[ ] An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. A \_\_\_\_\_.

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

[ ] For cases from **state courts**:

The date on which the highest state court decided my case was \_\_\_\_\_. A copy of that decision appears at Appendix \_\_\_\_\_.

[ ] A timely petition for rehearing was thereafter denied on the following date: \_\_\_\_\_, and a copy of the order denying rehearing appears at Appendix \_\_\_\_\_.

[ ] An extension of time to file the petition for a writ of certiorari was granted to and including \_\_\_\_\_ (date) on \_\_\_\_\_ (date) in Application No. A \_\_\_\_\_.

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

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## **CONSTITUTIONAL AND STAUTORY PROVISIONS INVOLVED**

United States Constitutional First Amendment: (Free Speech Clause)

United States Constitutional Fourth Amendment: (Search and Seizure)

United States Constitutional Fifth Amendment: (Due Process Clause)

United States Constitutional Fourteenth Amendment: (Due Process Clause)

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## **STAUTORY AND RULES**

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18 U.S.C. 669 (Theft of Health Care Information)

18 U.S.C. 1503 (Obstruction of Justice)

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Estelle v. Gamble, 429 U.S. 97 (1976)

First Amendment and Retaliation

Crawford-El v. Britton, 523 U.S. 574 (1998) (First Amendment)

## STATEMENT OF THE CASE

### I. Basis for Jurisdiction

The jurisdiction of this Court is involved under 28 U.S.C. 1254 (1), reviewing the judgement of the United States Court of Appeals for the Fourth Circuit entered on September 2, 2025, which affirmed the dismissal of the Petitioner's complaint alleging fundamental violations of the United States Constitution and the Civil RICO Act.

### II. Factual Background in HABC and Breakdown of 2015 Federal Settlement

1. The illegal **Enterprise** comprised of municipal officials, associated attorneys, and criminal elements, began in **2015** with the **fraudulent conversion of settlement funds** from an HABC lawsuit.
2. In **2017**, this conspiracy escalated to judicial deception when a **paid imposter** was sent to court to pose as Petitioner, constituting **Obstruction of Justice** and severe violation of **Procedural Due Process**.
3. This conspiracy led to fatal consequences in **2018**, when Petitioner's sister died from Cancer linked to hazardous chemicals in the Public Water System.
4. In **2019**, Petitioner filed a complaint with the Attorney Grievance Commission against representing Attorney's in the **2015** case. In **2022**, the **Petitioner** got a copy from the **AGC** by email. Once case filed against Mr. Timmins/HABC, email deleted from Petitioner's computer.
5. In 2019, Petitioner filed complaint in the District Court against Bozzuto, the Defendants stole court documents, submitted unknown documents to court. Sent fake letter to Petitioner's unit, stating the case was Dismissed in December 2019. **Obstruction of Justice, Procedural Due Process.**

### III. The Racketeering Enterprise and its Goal

- A. **The Enterprise Command Structure:** The Enterprise was allegedly directed by a sitting President and executed at the local level by the City of Baltimore, Mayor Brandon M. Scott, HABC, and associated non-government groups ("safe streets workers").

**B. The Goal:** The primary goals of the Enterprise were **extortion** (coercing the Petitioner into silence), retaliation (punishing the Petitioner for exercising First Amendment rights), and financial fraud (including the fraudulent diversion of \$50, 000 in funds, specifically alleged to be an imposter payment connected to the Social Security Administration (SSA). This specific financial predicate act was **not discovered by Petitioner until 2022/23**, when an SSA employee provided the information, underscoring the Enterprise's fraudulent concealment and continuity).

**C. The Method:** The Enterprise utilized its governmental and criminal resources to systematically target and eliminate the Petitioner's political opposition and silence the Petitioner by employing hazardous chemicals (escalated by the sitting President personally releasing chemicals into the atmosphere on Day 1 of the presidency) to cause medically debilitating illness and conducting illegal digital intrusions to destroy evidence and steal Protected Health Information (PHI/PII).

#### **IV. The Predicate Acts and Tampering with Medical Evidence**

The core of racketeering activity began immediately after the initial physical assault on the Petitioner, demonstrating the Enterprise's immediate necessity to control and destroy evidence:

- **Chemical Battery and Immediate Medical Verification:** The Enterprise committed **Chemical Battery** (18 U.S.C. 1961 (1) against Petitioner, utilizing chemicals that was applied to Petitioner's scalp at Manasota Manor Apartments on March 5, 2019.
- **Illegal Acquisition and Theft of PHI/PII (Fourth Amendment Violation):** Immediately following the medical documentation of the chemical injury, the Enterprise illegally breached the Petitioner's computer and the health care systems to acquire the Petitioner's Protected Health Information (PHI) and Personally Identifiable Information (PII). This theft is a separate predicate act (**Theft of Health**

Care Information, 18 U.S.C. 669) and a violation of the Fourth Amendment right to privacy.

- **Digital Tampering and Concealment:** Concurrent with the theft, the Enterprise engaged in Computer Fraud and Abuse (18 U.S.C. 1030) by scrambling medical records to remove evidence of chemical injury, thereby concealing the predicate act of Chemical Battery and creating the initial injury the Enterprise would exploit for years. The hacking was evidence by a cryptic, threatening email from a medical center and a non-Latin “Russian-like formula/timestamp” found on Petitioner’s device. A Russian submarine while conducting research for court filings.
- **RICO Pattern established:** These initial acts-Chemical Battery, PHI theft, and Computer Fraud-are related and continuous, establishing the necessary pattern of racketeering activity to prosecute the Enterprise under 18 U.S.C. 1962 (c).

**V. First Amendment Retaliation and Electoral Interference:** The Enterprise uses the stolen PHI/PII and its network access to engage in targeted political, reported to the Appeals Court in 2024;

**\*Targeted Digital Interference:** Petitioner received targeted, fraudulent texts while attempting to support a rival mayoral candidate.

**\* Presidential Election Interference:** Petitioner received automated voicemails and texts urging voter registration for mail-in or online voting for the 2025 sitting President.

**VI. Enterprise Leadership, Political Corruption, and Widespread Poisoning**

The Petitioner alleges the Enterprise is led by **Mayor Brandon Maurice Scott** and is utilized to facilitate high-level political corruption. Before and following the current President’s election, the Enterprise allegedly expanded the scope of chemical warfare:

- The **BGE deal** led to the installation and release of chemicals into the **gas pipelines** in addition to the chemical release in the Public Water

System. Once the sitting President took office in 2024, the chemical gases are released into the **atmosphere (24/7)** via drones, chemical rockets, other resources used, in the form of Weather Makers. As a result of the defendants using the chemicals in the **BGE pipelines**, causing the Petitioner to suffer illness, concentration difficulties, physical harm in public spaces (library, hospitals, food markets, the chemicals are everywhere),

- The hazardous chemicals are allegedly used as a weapon to “**rid of people**,” including the suspected deaths of two key witnesses in the Mayor’s official offices. Witnesses to the **Burglary in 2019**, and the **2024 electoral fraud** (bogus votes cast using personal information collected by HABC for the Mayor and sitting President).

## **VI. Racketeering Pattern: Final Sabotage and witness Attack (2019-2025) and Retaliation and Suppression of Evidence**

Petitioner alleges repeated thefts, loss, and scrambling of her legal files, devices, court submissions, and medical documents, including:

- Vehicle vandalism
- Stolen or hacked cell phones, computers and storage drive,
- Altered documents;
- Withheld records;
- Interference at public libraries when attempting to prepare filings.
- Property deprivation. The Enterprise sent Agent to unlawfully enter the Petitioner’s mother’s house during Christmas 2024, while Petitioner was preparing court documents, the Agent entered the Petitioner’s vehicle

1. **Financial Ruin:** The **Enterprise** continuously attacked Petitioner’s financial stability through **fraudulent life insurance solicitations** (ongoing since 2019), forcing **bogus MVA fees**, issuing **fictitious parking tickets** (resulting in unnecessary court appearances and parking ticket fees), and destroying Petitioner’s **BMW X5 & New Vehicle with a Car Note**, while on a reduced SSI income. This pattern included the last

property paying off a water bill for **Unused water**, billing sent to a **Collection Agency**.

2. **Medical Records Tampering and Family Attack:** The conspiracy extended to the deliberate neglect and attack of Petitioner's sister during a 3-week hospital stay in September 2025. HABC conducted an inspection of Petitioner's unit, and neighbor across the hall, who fell into a coma. Petitioner's sister reported her **Medical Records** were breached, **medical deception** and severe **Substantive Due Process violation** of bodily integrity, missing mail, Amazon account breached.
3. **Final Obstruction (11/2025):** The **Enterprise** continued to obstruct legal filings, a **transmitter blew, causing a power outage, loss of** Petitioner's legal filings. Direct act of **Obstruction of Justice**. The Defendants electronic interruptions continues while trying to complete my court filings, by mixing up my files.

#### **V. Environmental Chemical Exposure and Public Safety Failures**

Petitioner alleges that the City of Baltimore exposed residents to hazardous chemicals through water contamination, air dispersal, and other environmental means, Petitioner submitted photographs and have videos in the district court showing trails and releases in the air environment that coincided with days when sick. She further observed patterns of drones, chemicals dispersal lines, and airborne residue, symptoms of which matched those she experienced from water contamination.

Petitioner asserts that these exposures caused chronic illness, neurological symptoms, and respiratory distress. Petitioner reported environmental hazards but the City responded with indifference or retaliation.

#### **D. Further Retaliation and Ultimate Harm (Death of Petitioner's Sister)**

- The **Enterprise's** pattern of **Racketeering** activity and retaliation escalated beyond the Petitioner, resulting in the **death of the Petitioner's sister**. The Petitioner alleges that the sister was **poisoned by chemicals** released by the Enterprise as part of the

ongoing pattern of attack. This tragic loss represents the ultimate harm resulting from the Enterprise's criminal operations and its direct motive to punish and silence the Petitioner by targeting those, closet to them. This immense and fatal damage far standard civil injury and underscores the exceptional need for this Court's review.

#### **VI. Failure to Protect Public from Known Water Dangers**

The City of Baltimore did not warn residents of contamination and continued unsafe treatment practices.

#### **VII. Misconduct in Sister's Housing and Harm to Third Party**

Petitioner reported hazardous utility-closet conditions in her sister's unit in 2020. Petitioner reported her medical and personal information was breached, iPhone, security cameras, Amazon and banking/debit cards and at some point, one of the many illegal entries, the bottom of both doors were shaved down to allow the chemical gases from BGE pipelines to enter her unit. 2025, HABC conducted a superficial inspection, days later Petitioner had to be hospitalized for 3 weeks. A witness exposed to same fumes requires emergency heart surgery.

#### **VIII. Safe Streets and BGF-Affiliated Operations**

Petitioner alleges that Baltimore's mayor oversees the Safe Streets program, which has documented affiliations with Black Guerilla Family gang members. Petitioner asserts that Mayor Scott is the leader of BGF.

#### **IX. Life-Threatening Constitutional Violations (2018-2025)**

The Enterprise escalated its conduct to life-threatening abuses:

1. **Substantive Due Process Violation (2018):** Petitioner's sister, Tonya Cooper, died from cancer linked to hazardous chemicals in the Public Water System (PWS). This fatal deprivation of life was exacerbated by the City's alleged reckless disregard for the known contamination. **Multiple family and friends were affected by illness and death due to the hazardous chemicals.**

2. Targeted **Chemical Warfare**: The City's officials corruption facilitated the poisoning. Following a **2023 deal with BGE**, the same hazardous chemicals were introduced into gas pipelines across public spaces, confirmed by the presence of a co-conspirator, **Commercial Utilities**, at subsequent underground fires. Agents of the Enterprise intentionally inflicted harm on Petitioner by:
  - Forcing the Petitioner to live with contaminated water for thirteen months at The Metropolitan, installing **tubing system** in all Petitioner's unit to release gases through drilled holes.
  - Committing attempted homicide by applying **hazardous chemicals to Petitioner's scalp** while asleep in 2020.

#### **A. Racketeering Pattern and Extreme Constitutional Violations (2019-2024)**

The Enterprise continuously violated the Petitioner's rights, demonstrating a clear **pattern of racketeering activity** through both officials and criminal channels: The Enterprise is an association-in-fact spanning federal and municipal government agencies and private entities. It was organized under direct command from sitting president, executed locally by Mayor Scott and his subordinates, for the common purpose of political retaliation and theft of protected information. The racketeering activity began with targeted **Chemical Poisoning/Battery** (in both water and the atmosphere), resulting in documented physical injury, with the motive being to silence and punish the Petitioner for opposing the political interests of the Enterprise's directive sources.

#### **B. Predicate Acts and Tampering with Medical Evidence**

1. **Medical Verification and Evidence Tampering**: Following the chemical exposure, Following the chemical exposure, the Petitioner's doctors verified the exposure and record it in the medical files. The Defendants then illegally accessed and scrambled these records, thereby stealing the **Protected Health Information (PHI) and Personally Identifiable Information (PII)** as documented in the **Mr. Timmins/HABC court filings**.
2. **Computer Fraud and Infiltration**: This theft was facilitated by sophisticated hack of Petitioner's computer, which revealed internal

files belonging to “safe streets workers” city employees, HABC, directly confirming the Enterprise’s connection and **top-down instruction**.

3. **Intrusion into Medical Communication:** While the Petitioner scheduled an MRI, the Enterprise injected a cryptic, threatening email from a medical center into the Petitioner’s communications. Further proof of high-tech intrusion exists in a photograph of a strange, non-Latin, **Russian-like formula/timestamp** found on the Petitioner’s iPhone.

#### **C. First Amendment and Retaliation and Electoral Interference**

The Enterprise uses the stolen PHI/PII and its network access to engage in targeted political retaliation, reported to the Appeals Court in 2014:

1. **Targeted Digital Interference:** Petitioner received targeted, fraudulent texts while attempting to support a revival mayoral candidate.
2. **Presidential Election Manipulation:** Petitioner received automated voicemails and texts urging voter registration for mail in or online voting for the **sitting President’s campaign**.
3. **Local Election Manipulation:** Interference was alleged during **city mid-terms** (as documented in prior filings).
3. **Narcotics and Homicide Attempts:** The racketeering pattern includes direct physical attacks:
  1. A doctor, leveraging a hospital partnership, arranged for the unauthorized **door delivery of Oxycodone** in 2019.
  2. Agent later entered the apartment, stole medication, and replaced it with suspected high-risk substance (**Fentanyl**).
  3. Petitioner’s **brake lines were cut** on vehicle, constituting attempted homicide.

#### **D. Retaliation, Surveillance, and Enterprise Continuity**

The Enterprise continuously retaliated against Petitioner for filing federal complaints:

1. **First and Fourth Amendment Obstruction and Retaliation:** The City's Office of Equity and Civil Rights attempted to lure Petitioner to an alley to discuss the Bozzuto case. The Enterprise also intercepted Petitioner's application for City employment in 2020 and 2024.
2. **Fourth Amendment Violations:** The Enterprise maintained continuous illegal surveillance, including hacking Petitioner's computer and iPhone, stealing court documents (including DOJ letter), and illegally installing a tracker in Petitioner's vehicles, leading to marked city vehicles and gang members engaging in intimidation. Threatening mail.
3. **RICO Continuity and Official Complicity:** The Enterprise's pattern is confirmed by its official leadership: Mayor Brandon Scott is alleged to be the leader of the Black Guerilla Gang, which employed members through the City's Safe Streets program. When the FBI raided Safe Streets, the Enterprise responded by detonating a "fresh chemical bomb" in Petitioner's apartment.
4. The Enterprise's purpose includes using municipal resources to facilitate election fraud, which required the elimination of witnesses and the use of chemical warfare to cover up the conspiracy. Petitioner alleges the election outcome was rigged.
- 5.

**Extreme Abuse Under Color of Law:**

6. **Climax of Violence:** The pattern culminated with the Enterprise allegedly orchestrating the Murder of Petitioner's family member one month after the District Court filing, while police officers were instructed to stand feet away and failed to intervene. The continuity was proven in 2024 when an impostor appeared at Petitioner's new address to intimidate the Petitioner. Other Key witnesses murdered, due to hazardous chemical exposure.

**E. Property Deprivation and Continued Harassment and Extortion (2024-2025):** The Enterprise continuous and constitutional violations extended to ongoing property deprivation in 2024. October 2025, 2 days after Petitioner's family member was hospitalized for three weeks due to chemical exposure, Baltimore County Housing Authority seize Petitioner's housing voucher

**two days later**, a severe deprivation of property interest without due process and clear act of ongoing retaliation. Agents entered Petitioner's residence to steal court mail and other document/mail, sent fake court mail (Mail Fraud), and **unlawfully entered Petitioner's mother's apartment** and vehicle during the **2024 Christmas Holiday** to steal Petitioner's personal property, interference with court filings; confirming the ongoing nature of the conspiracy. The Enterprise denied Petitioner with employment opportunities.

#### **F. Prior Proceedings and Denial of Due Process**

The District Court [Granted motion to dismiss/summary judgment] for Respondent, concluding that Petitioner's detailed factual allegations were "**implausible**" "**delusional**" or "**frivolous**" there by substituting a factual credibility finding for the required legal standard of review under Bell Atlantic Corp. v. Twombly (2007) and Ashcroft v. Iqbal (2009). The United States Court of Appeals for the Fourth Circuit affirmed this judgment on September 2, 2025.

**G. Political Motivation and Widespread Poisoning:** Petitioner alleges that the motivation for Enterprise's actions stems from political corruption and cover-up. Beginning with the sitting President leading up to the 2020 elections. Continued while out of office, when the former President and his Agents formed a plan for the 2024 elections. Using the U.S. Postal Service to collect mail-in ballots intended for his political rival. In 2025, I found a news article, a Amazon box filled with mail-in ballots was found.

## Reason for granting the Petition of Certiorari

The District Court's summary dismissal of the Petitioner's claims as "delusional" constitutes a profound, reversible error of law, procedure and denial of due process that this Court must review. This action created a dangerous precedent, shielding powerful defendants from discovery merely because the magnitude of the alleged criminal enterprise sounds "extraordinary". The error is compounded by the fact that the Court failed to properly consider the Petitioner's status as a pro se litigant suffering from documented chemical injury, and improperly rejected highly specific allegations of politically motivated racketeering.

### **A. The District Court's Improper Substitution of Fact-Finding for Legal Review**

The established standard for dismissal at the stage requires a court to accept all well-pleaded factual allegations as true and test only the claim's legal sufficiency. The District Court violated this fundamental principle of due process by making a subjective credibility judgment against the Petitioner's claim. Whether the allegations fall to state a claim upon which relief can be granted- a test of legal sufficiency, not factual veracity. In dismiss the complaint, the District Court improperly substituted its own skepticism for the judicial requirement to accept all well-pleaded factual allegations as true.

The comprehensive pattern of racketeering activity alleged dismissed despite being supported by documents, specific evidence proving the Enterprise sophistication and pervasive reach.

- **Targeted Medical Infiltration:** While scheduling an MRI, the Petitioner received a cryptic, frightening email from a medical center. A photograph of the email was submitted to the courts an exhibit, demonstrates the Enterprise's ability to inject threatening communications directly into the Petitioner's protected health care communications.
- **Computer Fraud and Evidence of Enterprise:** The Petitioner later discovered their computer had been hacked, revealing a trove of data showing the Enterprise's composition, including files related to "**safe streets workers**" **city employees, and HABC**. This evidence confirms the RICO "**association-in-**

fact" element, demonstrating the Enterprise's reach across governmental and private sectors.

- **Cryptic Digital Communication:** Further proof of intrusion exists in a photograph of a strange, non-Latin, **Russian-like-formula/timestamp** on the Petitioner's iPhone. This evidence, which was time-stamped differently from medical email, suggest the use of encrypted or obfuscated language to communicate between Enterprise members while accessing the Petitioner's private devices. Petitioner submitted the exhibits to the courts in **Mr. Timmins/HABC**.

The District Court's refusal to acknowledge these specific, documented, and highly technical allegations as plausible-instead labeling them as "delusional"- is a grave error of law. It establishes a standard where the sophistication of the crime, then the lack of evidence, is grounds for judicial dismissal.

This judicial error effectively created a zone of immunity for defendants whose crimes are so high-profile or large-scale that they appear "implausible" to judge at the motion-to-dismiss.

Specifically, the Court's determination that the comprehensive, documented pattern of racketeering activity- including the theft of Health care records, HABC/PII theft), chemical poisoning, and targeted electoral interference (texts regarding mail-in voting and rival candidates) -was delusional represents:

1. **A failure to Construe RICO Liberally:** Congress intended the Racketeer Influence and Corrupt Organizations Act (RICO) to be construed broadly to fight organized crime in all its forms, complex political or corporate corruption. The District Court violated this mandate by dismissing the claim based on the severity and public profile of the alleged Enterprise, rather than analyzing whether the facts pled met the statutory elements of 18 U.S.C. 1962 © AND (D).
2. **A Denial of Discovery:** The court's premature factual finding prevented the Petitioner from accessing discovery tools necessary to substantiate claims of high-level conspiracy, effectively granting the Enterprise immunity from investigation.

**B. The Due Process Violation: Dismissal of First Amendment Claims Based on Subjective Disbelief**

The District Court “delusional” labeling directly prejudiced the Petitioner’s claim of First Amendment retaliation. The allegation is that the Enterprise used the theft of PII and wire fraud to launch **targeted, real-time harassment** (texts to register for mail-in voting; texts interfering with a mayoral campaign) only after and because Petitioner engaged in protected political activity.

This confluence of evidence-highly specific, time-sensitive digital interference tied to Petitioner’s political opposition-demonstrates a direct, actionable First Amendment violation. The District Court’s refusal to acknowledge this explicit link, instead classifying it as “delusional,” effectively validates the lower court’s power to summarily quash politically sensitive civil rights claims based on nothing more than subjective incredulity.

This Court should grant the Writ of Certiorari to reaffirm that extraordinary claims, when pled with sufficient factual particularity to satisfy Federal Rule of Civil Procedure 9(b) (for fraud-based predicate acts), must be tested through the discovery process, not arbitrarily dismissed as “delusional” before the Petitioner has had the opportunity to develop the evidence.

#### **C. Failure to Liberally Construe Claims of a Pro Se Litigant**

Petitioner is not a lawyer and has navigated this complex civil RICO litigation pro se (without counsel) while suffering from medically documented chemical-induced illness. This Court has long held that pro se complaints must be held to less stringent standards than those drafted by attorneys.

The District Court was aware:

1. Of the Petitioner’s medical condition resulting from the Enterprise’s alleged chemical poisoning.
2. That the evidence and exhibits for the predicate acts are lodged with the court (the only place Petitioner felt they could be kept safe.)

The Courts decision to label the claims “delusional” despite the existence of filed evidence and the documented health condition of the Petitioner demonstrates a clear failure to apply the requisite liberal pleading standard for pro se litigants.

3. Petitioner alleged specific acts by the Mayor, HABC CEO, City Agencies and contractors that-if accepted as true-state claims under the First,

Fourth, and Fourteenth Amendments. The Fourth Circuit's refusal to credit these allegations or allow amendment creates a direct conflict with this Court's required pro-liberal construction of pro se filings.

**D. The Fourth Circuit's Rule 15 Decision Conflicts With, Nationwide Appellate Authority Allowing Amendment to Add Necessary Defendants**

Petitioner moved to amend to add HABC CEO Janet Abrahams-who acted under the color of state law and directly supervised the officials at HABC whose retaliation allegedly harmed Petitioner and her family (sister) that lives in housing. The district court amendment without applying Rule 15's liberal standard or considering relevance, prejudice, or necessity.

This conflicts this Court's instruction in *Forman v. Davis*, 371 U.S. 178 (1962), that amendments should be freely granted absent undue delay, prejudice, futility. It also conflicts with decisions from the First, Second, Seventh, Ninth, and D.C. Circuit requiring meaningful reasoning when denying amendment. The Court should grant review to restore these conflicts and restore the proper Rule 15 standard.

**E. The Case Presents an Important Question of Federal Law: Municipal Liability When a City Engages in a Pattern of Retaliation, Environmental Danger, and Concealment Affecting Public Health**

Petitioner's allegations describe a pattern of unconstitutional conduct by the City of Baltimore:

- deliberate indifference to dangerous environmental conditions in housing;
- concealment of hazardous water-treatment chemicals used jointly with DPW and Commercial Utilities;
- retaliation within days of the death of Petitioner's sister Tonya Cooper, following chemical exposure;

violation of privacy rights, including unauthorized access to medical and financial records; targeted chemical exposure, housing retaliation, and interference with Petitioner's ability to litigate.

This Court has never squarely addressed when municipal concealment of environmental hazards-combined with retaliation-constitutes a due-process violation under *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978). The Fourth Circuit failed to consider whether a persistent, well-documented

municipal custom of concealment, retaliation, and endangerment gives rise to 1983 liability.

The issue is nationally significant because environmental-hazards concealment by municipalities is increasing nationwide with communities lacking clear constitutional framework for such claims.

**F. The Fourth Circuit's Rejection of Petitioner's Conspiracy Allegations Under 1985 Conflicts With, Other Circuits and Deepens a National Split**

Petitioner alleged coordination among the Mayor's office, HABC leadership, City agencies, contractors in suppressing complaints, tampering with mail, accessing medical and financial data, flooding Petitioner's vehicle and interfering with court access.

While the Fourth Circuit dismisses 1985 claims broadly, other circuits are openly split on whether retaliation against witness, reporter, or litigant qualifies.

This case clearly presents that issue, and this Court's guidance is needed.

**G. The Case Important Issues of Access to Courts and the Right to a Fair Opportunity to Litigate**

Petitioner alleged:

- Interference with outgoing and incoming mail;
- Loss, theft, or tampering of filings and evidence;
- Interference with electronic devices used for litigation;
- Corruption of documents relevant to past and present cases;
- Ongoing retaliation affecting Petitioner's ability to gather documents and respond to motions.

The allegations, if true, implicate the First Amendment right of access to courts recognized in *Bounds v. Smith*, 430 U.S. 817 (1977), and *Lewis v. Casey*, 518 U.S. 343 (1996).

The Fourth Circuit issued no meaningful analysis, deepening inconsistency among circuits on what constitutes a sufficiently pled access-to-courts claim.

Supreme Court review is warranted.

**H. The questions Presented Are Recurring and of Exceptional Importance**

[ 5 ]

This case is not an isolated dispute. It raises recurring issues:

- When municipality be held liable for systemic retaliation?
- Are courts permitted to disregard plausible pro se allegations?
- May a pro se litigant add required defendants at the pleading stage?
- How should courts treat claims involving environmental hazards concealed by government entities?
- Does 1985 protect individuals who attempt to expose government misconduct?

What constitutes unconstitutional interference with court access?

The Fourth Circuit treatment of these issues conflicts with Supreme Court precedent and other circuits. Review is necessary to ensure uniformity nationwide.

#### **I. Targeting Protected Political Activity and Improperly Dismissed First Amendment Claims**

The Petitioner's most critical allegations, which were reported to the Appeals Court in 2024, concern direct interference in national and local elections—acts of **Wire Fraud** used for **First Amendment Claims**

Petitioner specifically alleged receiving:

- Targeted, fraudulent texts while supporting a rival mayoral candidate.
- Automated voicemails and texts urging voter registration for mail-in or online voting for the **sitting President's campaign**. Especially, after statements made by Steve Bannon while at a party Mar-a-Lago, and the statements made by the sitting president before and after the 2024 elections.
- Evidence of interference during city mid-terms (as documented in prior filings).

These allegations directly link the Enterprise's racketeering activity to corruption of electoral process and the retaliation against the Petitioner's exercise of free speech. By labeling these specific, time-sensitive, and politically critical claims as "delusional," the District Court:

- **Violated the First Amendment:** By insulating the Enterprise from accountability for using illegal means to suppress political opposition.
- **Failed to Recognize a Pattern of Racketeering:** By refusing to acknowledge the relatedness and continuity inherent in using electoral fraud (mail/wire fraud predicate acts) as an ongoing mechanism of the Enterprise.

#### **J. The District Court's Improper Substitution of Fact-Finding for Legal Review**

The District Court's summary dismissal of Petitioner's claims as "delusional" constitutes a profound, reversible error of law and procedure, creating a dangerous precedent that warrants this Court's immediate review. This error is compounded by the fact that the Court failed to properly consider the Petitioner's status as a **pro se** litigant suffering from a documented chemicals injury, and improperly rejected highly specific allegations of politically motivated racketeering.

The established standard for dismissal at the pleading stage requires a court to accept all well-pleaded factual allegations as true and test only the claims legal sufficiency. The District Court violated this fundamental principle of **due process** by making a subjective credibility judgement against the Petitioner's claims.

The comprehensive pattern of racketeering activity alleged was dismissed despite being supported by documented specific evidence proving the Enterprise's **sophistication and pervasive reach**, including:

1. Chemical Battery and Targeted: The initial act of chemical poisoning against Petitioner, utilizing the HVAC system as the method of targeted delivery, was medically verified yet dismissed as "delusional".
2. Digital Tampering and Concealment: The alleged illegal access, theft, and **scrambling of medical records** (PHI/PII theft violations) was evidenced by filed exhibits (cryptic email and non-Latin timestamp on devices).

#### **K. Failure to Liberally Construe Claims of a pro Se Litigant**

- A. Petitioner is not a lawyer and has navigated this complex civil RICO litigation **pro se** (without counsel) while suffering from medically documented chemical-induced illness. This Court has long held **pro se** complaints must be held to less stringent standards than those drafted by attorneys. The Court's

decision to label the claims “**delusional**” despite the existence of filed evidence and documented health condition of Petitioner demonstrates a clear failure to apply the requisite liberal pleading standard for pro se litigants, constituting a violation of petitioner’s Due Process. This Court must grant the Writ of Certiorari to correct this substantial procedural and constitutional error, ensuring that extraordinary allegations of political racketeering, especially from pro se litigants, are tested by discovery rather than dismissed by judicial incredulity.

- A. The lower court misapplied the “shock of conscience” test by failing to recognize the ongoing, deliberate indifference to a known danger (water contamination, BGE pipeline) as an egregious violation. Cite Supreme Court cases that define the high standard for government conduct that deprives citizens life and liberty.
- This is a national significance, determining the scope of municipal liability under 42: U.S.C. 1983 for catastrophic failures in public health infrastructure (like water & BGE pipelines systems). If unchecked, this ruling allows municipalities nationwide to ignore critical infrastructure safety without fear of constitutional accountability.
- The lower court ruling establishes a dangerous precedent by effectively immunizing the retaliatory use of the state power (property vandalism/seizures) against citizens who complain about official misconduct (Mayor’s Office, HABC, DPW, City Employees and its vendors). This directly chills 1<sup>st</sup> Amendment rights.
- The lower courts erred by treating the targeted continuous destruction and seizures of property as a mere tort claims rather than actions violating the 4<sup>th</sup> Amendment’s requirement for reasonableness, especially when driven by retaliatory intent.
- The Court of Appeals created a circuit split regarding the RICO and 42: U.S.C. 1983 that erroneously excluded acts related to

- deprivation of constitutional rights (e.g., obstruction of justice, extortion, mail/wire fraud connected to stealing federal/state/tax payer's funds) from the list of valid "RICO" predicate acts" when perpetrated by government entity.
- The court's ruling creates a conflict over whether a municipal entity (or an association of its officials) can be properly defined as an "Enterprise" under 18 U.S.C. 1961 (4), particularly when that enterprise's purpose involves maintaining an illegal status quo or stealing funds. This includes the District Court of Maryland (Baltimore), The Court of Appeals for the Fourth Circuit.

### **RICO-Related Harms and Constitutional Violations**

**1. Obstruction of Justice**-Petitioner asserts that Respondents engaged in obstruction of justice by interfering with the ability to access courts, including destruction and theft of legal documents, tampering with evidence, actions that impeded Petitioner's ability to pursue legal claims.

Obstruction of justice constitutes a predicate act under RICO (18 U.S.C. 1503 et seq) and also violates **procedural due process**, because it deprives Petitioner of a fair, unimpeded opportunity to be heard.

**2. Judicial Deception**- Petitioner alleges that Respondents provided false or misleading statements in administrative and court proceedings, contributing to dismissals or adverse rulings. Judicial deception implicates the Fourteenth Amendment's **Due Process Clause** and can constitute

racketeering activity when done as part of a coordinated scheme to deny rights.

**3. Extortion-** Extortion falls squarely under RICO's predicate acts (18 U.S.C. 1951, Hobbs Act). Petitioner alleges Respondents used threats, coercion, or unlawful leverage-such as manipulating housing conditions, chemical exposure, employment retaliation, and document theft- to force compliance or silence. These actions constitute extortion under federal law when performed under color of official authority.

**4. Chemical Battery-** Petitioner asserts that Respondents intentionally exposed Petitioner and family/friends to harmful chemicals through housing units, water systems, and environmental discharge. Such conduct constitutes **battery** under common law and, systematic and coordinated, serves as evidence of a pattern of racketeering activity and deliberate indifference in violation of substantive due process.

**5. Digital Tampering-** Petitioner alleges interference with Petitioner's devices, cloud accounts, and personal data. These actions constitute wire fraud, computer fraud, and evidence tampering, all qualifying as predicate acts under RICO, especially when committed by government

officials or contractors as part of a coordinated scheme to suppress evidence.

These additional RICO-related harms demonstrate the breath of Respondent's alleged coordinated conduct and reinforce Petitioner's claims of systematic constitutional violations and the necessity for Supreme Court review. **A. Inclusion of HABC CEO Janet Abrahams,** Petitioner moves to include CEO Abrahams because she acted directly under Mayor Scott's direction and directly participated in violations of Petitioner's constitutional rights by authorizing illegal entries, withholding safe housing, ignoring the 2015 settlement obligations, and enabling retaliation. **B. Enforcement of 2015 Settlement.** The settlement in *Nicole Andrea Smith v. HABC* required HABC to issue Petitioner a lifetime housing voucher and ensure safe placement. HABC never honored these terms. The Court should enforce the settlement and remand with instructions for full compliance. **C. Pattern of Government Retaliation.** Defendants engaged in a multi-year pattern involving tracking, surveillance, theft of filings, dissemination of medical data, chemical exposure, and use of Safe Streets/BGF affiliates for intimidation.

## **6. The Ongoing Nature of the Enterprise Demands Certiorari**



The racketeering activity is not historic. It is **ongoing** and poses a continuing threat to the Petitioner. The escalation of the threat has been proven by alleged **murder of two key witnesses**- an **Election Supervisor** and a **Baltimore City Police Officer/Safe Streets**- before being appointed by Mayor Scott to deputy Mayor in 2022, demonstrating the Enterprise's willingness to commit fatal crimes with **entitled impunity** to conceal its electoral fraud and locations.

The racketeering activity alleged is not historic, it is **ongoing** and poses a continuing threat to the Petitioner. The escalation has tragically included the **death of the Petitioner's sister** due to the same chemical poisoning. Furthermore, the Enterprise continues to utilize local government entities for immediate harm, most recently evidenced in **October 2025** by the **improper revocation and denial of Petitioner's housing voucher** by **Baltimore County** immediately following the Petitioner's sister's hospital release due to chemical exposure, one week after HABC conducted an inspection of the Petitioner's sister's unit, and the neighbor across the hall fell into a **Coma** one week later after HABC conducted an inspection. This constitutes further **retaliation and extortion** in violation of

Petitioner's civil rights and is direct proof that the Enterprise's criminal pattern has not ceased.

The lower court's dismissal effectively endorsed the continuation of a sophisticated criminal enterprise that has demonstrated the intent and ability to commit:

- Fatal chemical attacks.
- Systematic violation of the Fourth Amendment (privacy and PHI theft).
- Targeted political suppression (First Amendment retaliation).
- **Ongoing administrative harassment.**

This Court must grant the Writ of Certiorari to correct this substantial procedural and constitutional error and affirm that a continuing RICO enterprise, which affects the integrity of the judicial process and results in fatal consequences, cannot be dismissed based on the extraordinary nature of the allegations.

#### CONSTITUTIONAL AND STAUTORY VIOLATIONS

- First Amendment: Interference with political participation, petitions, and expression.

- Fourth Amendment: Unlawful tracking, searching, and surveillance.
- Fifth/Fourteenth Amendments: Conspiracy to interfere with civil rights.
- 42 U.S.C.1983: Pattern of civil rights violations by state actors.
- 42 U.S.C. Conspiracy to interfere with civil rights.
- Fair Housing Act (42 U.S.C. 3601 et seq.).
- RICO (18 U.S.C. 1961-1968): Coordinated pattern of racketeering activity.

Public Importance: Chemical contamination, unlawful surveillance, and obstruction of justice affect the public interest.

Total Words 3181

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Relief Sought

1. **Grant** the Petitioner for Writ of Certiorari.
2. **Reverse** the judgement of the United States Court of Appeals for the Fourth Circuit.
3. **Remand** the case to the District Court with instructions to immediately: a) **Reinstate** the Complaint. B) **Order** immediate discovery against all Defendants and the alleged Enterprise members. C) **Appoint** counsel to represent the medically compromised pro se Petitioner during all subsequent proceedings.

Respectfully submitted,

*Lynette Cooper*

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## **CONCLUSION**

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Lynette Cooper

Date: December 8, 2025