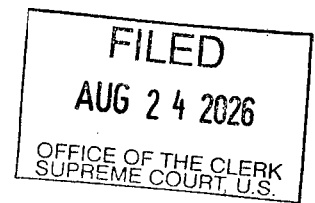


26-5593 ORIGINAL

No.26-



IN THE
Supreme Court of the United States

STEVEN CLARK LEFEMINE,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

On Petition for Writ of Certiorari to the
United States Court of Appeals
for the Fourth Circuit

PRO SE PETITION FOR A WRIT OF CERTIORARI

STEVEN C. LEFEMINE
Pro Se Petitioner
Post Office Box 12222
Columbia, South Carolina 29211
803-760-6306
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September 10, 2026

QUESTIONS PRESENTED

1. Whether "the Laws of Nature and of Nature's God" cited in the 1776 Declaration of Independence are the foundation of America's jurisprudence today.
2. Whether the overwhelming body of scientific evidence that human biological life begins at fertilization requires present recognition of this scientific fact universally in the law.
3. Whether the Creator God-given, inherent, unalienable right to life of every human being as a natural person, together with the preceding as affirmative premises, requires as self-evident truth, the logical necessity of present recognition in the law of every human being as a legal person, beginning at fertilization.

PARTIES TO THE PROCEEDING

Petitioner is Steven C. Lefemine.

Respondent is United States of America.

RULES OF THE Supreme Court of the United States SUPREME COURT RULE 12

Rule 12. Review on Certiorari: How Sought; Parties

6. All parties to the proceeding in the court whose judgment is sought to be reviewed are deemed parties entitled to file documents in this Court, unless the petitioner notifies the Clerk of this Court in writing of the petitioner's belief that one or more of the parties below have no interest in the outcome of the petition.

LIST OF ALL PROCEEDINGS

U.S. Court of Appeals for the Fourth Circuit, No. 24-4419, *United States of America v. Steven Clark Lefemine*, judgment entered May 1, 2026.

U.S. District Court for the District of South Carolina at Columbia, No. 3:23-cr-117, *United States of America v. Steven Clark Lefemine*, final judgment in a criminal case entered on July 31, 2024.

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Mayo Clinic Complete Book of Pregnancy & Baby's First Year, Robert V. Johnson, M.D., Editor-in-Chief, Copyright © 1994 by Mayo Foundation for Medical Education and Research	25
South Carolina State Constitution, Article I, Section 3. (scstatehouse.gov)	31, 32
United States Senate Judiciary Subcommittee Chairman's Report on The Human Life Bill S.158 (1981)	24, 25, 30
William Blackstone, <i>Commentaries on the Laws of England</i> , Volume 1, Introduction, Section 2: Of the Nature of Laws in General (1765)	14, 16, 17, 28

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The district court's order denying Defendant's Motion for Defense of Necessity (ECF No. 77 and ECF No. 98) is reprinted at Pet.App.D.

The Fourth Circuit's ruling in *United States of America v. Steven Clark Lefemine* (No. 24-4419) is reprinted at Pet.App.A1. The Fourth Circuit's order denying Appellant's Petition for Rehearing and Rehearing En Banc is reprinted at Pet.App.B. The Fourth Circuit's order denying Appellant's Motion to Relieve Counsel is reprinted at Pet.App.C.

STATEMENT OF JURISDICTION

On May 1, 2026, the Fourth Circuit issued its decision affirming the district court's judgment. On May 29, 2026, the Fourth Circuit denied rehearing and rehearing en banc. On June 2, 2026, the Fourth Circuit denied motion for leave to file pro se supplemental petition for rehearing and rehearing en banc, denied motion for leave to file out of time motion for rehearing and rehearing en banc, denied motion for leave to file amended/corrected motion for leave to file motion for rehearing and rehearing en banc, and administratively struck document from docket: Pro se PETITION for rehearing and rehearing en banc. The district court had jurisdiction under 18 U.S.C. § 248 and subparts, and the Fourth Circuit under 28 U.S.C. § 1291. This Court has jurisdiction under 28 U.S.C. § 1254(1).

PERTINENT CONSTITUTIONAL AND STATUTORY PROVISIONS

This case involves United States Constitution Amendment V Amendment XIV, § 1, and Title 18 U.S.C. § 248, Pet.App.E.

INTRODUCTION

This case involves far more than only the issue of the denial of a jury trial, the argument brought by the Petitioner's court-appointed counsel. The foremost issues raised in the Appellant's two pro se supplemental briefs (Appellant's initial pro se supplemental brief ECF 32-1 (February 7, 2025) with Exhibits A-M - ECF-32-2 (February 7, 2025) and Appellant's amended pro se supplemental brief ECF 52 (August 12, 2025)) are more fundamental and foundational and essential:

- 1) **God's Law is the rightful, just basis for man's law.**
- 2) **Human life begins at conception; A human being exists at conception.**
- 3) **Every human being has a Creator God-given, inherent, unalienable right to life as a natural "person" which should rightly be recognized in law as legal personhood.**

This year 2026 is the 250th Anniversary year of the adoption of our nation's Founding Document, the Declaration of Independence, on July 4, 1776, which is today one of the Organic Laws of the United States of America, found in Volume One of the US Code. In the 1776 Declaration's first sentence, we see the very basis asserted by our country's founders for America's right to exist as a separate and equal nation among the nations of the earth, was upon **"the Laws of Nature and of Nature's God"**, and thus also expressing at the birth of our nation the foundation of America's jurisprudence; in other words, **God's Law in Nature** (General Revelation) and **God's Law in Scripture** (Special Revelation). This is an essential and fundamental and foundational part of America's history and heritage. Affirmation and application of this historical American truth is of greater importance even than arguing the issue of denial of a jury trial, which is of course also important, albeit lesser. The appellate court erred in ignoring this important issue. Surely there can be no more vital, critical, fundamental, and foundational legal issue than for this Court to affirm the original, historical foundation of America's jurisprudence as expressed at the birth of our nation in America's Founding Document, the 1776 Declaration of Independence, in the words, **"the Laws of Nature and of Nature's God"**. This is existential for "America" as we know it.

Because the appellate panel's opinion effectually ignored substantive adjudication on any and every one of the Appellant's Issues on Appeal, including those in the initial pro se supplemental brief the court granted to be filed ECF 32-1 (February 7, 2025) and Exhibits A-M in ECF-32-2 (February 7, 2025), these critical issues remain to be addressed by this Court.

The overwhelming body of scientific evidence, over the course of many decades, is that human biological life begins at fertilization/conception. Yet incredibly, the truth of this biological fact continues to be debated in the public square in America. There are major moral and cultural issues (e.g., “abortion”, IVF, abortifacient “birth control”) in American life which are significantly affected by acceptance of the truth that human life begins at conception. Yet in some sectors of the American public, this scientific fact is denied. This present case provides the Court with an opportunity to speak with authority and clarity on this important matter in pursuit of truth and the establishment of Justice. One of the purposes for which the United States Constitution was ordained and established, was to “establish Justice” (Preamble).

If human life begins at fertilization/conception (as it does), then in order to “establish Justice” as the United States Constitution requires, recognition of natural persons (all human beings without exception) as legal persons, is necessary in our system of American jurisprudence. It is a self-evident truth. It is logically necessary. Natural human persons ought always rightfully be recognized as legal human persons. This present case provides the Court with an opportunity to speak to the nation with authority and clarity on this important matter in pursuit of truth and the establishment of Justice.

For all these reasons, Petitioner respectfully requests that the Court grant the petition for a writ of certiorari.

STATEMENT OF THE CASE

A. Title 18 U.S.C. § 248 – Freedom of Access to Clinic Entrances Act (FACE) (1994)

In 1994, the U.S. Congress passed and the President signed, S.636, the Freedom of Access to Clinic Entrances Act (Public Law No. 103-259) which criminalizes (among other acts) whoever

“by force or threat of force or by physical obstruction, intentionally injures, intimidates or interferes with or attempts to injure, intimidate or interfere with any person because that person is or has been, or in order to intimidate such person or any other person or any class of persons from, obtaining or providing reproductive health services”.

On November 15, 2022, consistent with Defendant’s Corrected Affidavit in Support*, Petitioner

nonviolently sat outside and in front of the exterior client door of the Planned Parenthood “abortion” center at 2712 Middleburg Drive, Suite #107, Columbia, SC 29204 for purpose of interposing between innocent human beings inside the wombs of mothers arriving for “abortions”, and those inside the Planned Parenthood “abortion” center seeking to unjustly end their lives.

*** DEFENDANT’S CORRECTED AFFIDAVIT IN SUPPORT**

ECF No. 99 (Filed March 4, 2024)

U.S. District Court for the District of South Carolina (CR. NO. 3:23-00117-JFA)

Video (11/15/2022) - https://christianlifeandliberty.net/IMG_8795.mp4

Video (11/15/2022) - http://christianlifeandliberty.net/VID_20221115_075014577.mp4

Petitioner was arrested by officers with the Columbia Police Department, charged with trespass, released, and later tried, convicted by a jury in municipal court on January 24, 2024, and sentenced to a fine of \$465.

During the pendency of the case brought under state law, the United States Attorney for the District of South Carolina indicted Petitioner for one count of violating the FACE Act, 18 USC § 248. The indictment was filed February 22, 2023.

B. District Court proceedings

On March 7, 2023, Petitioner was arraigned before a federal magistrate and released pending trial on a \$25,000 unsecured bond. On January 18, 2024 Petitioner’s public defender trial counsel filed a motion to dismiss the FACE charge in view of the U.S. Supreme Court opinion in the case *Dobbs v. Jackson Women’s Health Organization*, 597 US 215 (2022). During a February 6, 2024 hearing, the district court granted Petitioner’s request to proceed *pro se*. On February 9, 2024, the Petitioner filed a reply to the government’s response opposing the motion to dismiss the FACE charge. On February 13, 2024, Petitioner filed a motion requesting permission to argue the defense of necessity.** Petitioner filed a reply on March 4, 2024 to the government’s response in opposition to Defendant’s motion for allowance of a defense of necessity.***

**** MOTION FOR ALLOWANCE OF DEFENSE OF NECESSITY**

ECF No. 77 (Filed February 13, 2024)

U.S. District Court for the District of South Carolina (CR. NO. 3:23-00117-JFA)

***** DEFENDANT'S REPLY TO GOVERNMENT'S RESPONSE IN OPPOSITION TO DEFENDANT'S MOTION FOR ALLOWANCE OF DEFENSE OF NECESSITY**

ECF No. 98 (Filed March 4, 2024)

U.S. District Court for the District of South Carolina (CR. NO. 3:23-00117-JFA)

A bench trial was set to begin February 23, 2024. The district court first heard argument concerning the motion to dismiss the FACE charge, but the motion was denied. No written order was provided for this ruling. The district court also addressed the Petitioner's motion to argue the defense of necessity, but the judge determined to rule later. Then because the Petitioner had not been provided with a properly unredacted FBI report, the district court continued the matter until March 11, 2024.

The full trial occurred on March 11, 2024. The district court denied the request to make a defense of necessity. There was no oral argument on the matter. The judge filed a written opinion on this matter later in the day. Petitioner was allowed to read his Corrected Affidavit in Support (ECF no. 99, filed March 4, 2024) from the witness stand while testifying. The district court found the Petitioner guilty of violating the FACE Act. During closing argument, the Petitioner was explicitly prohibited by the district court judge from addressing the recent Alabama IVF case adjudicated by the Alabama State Supreme Court, *LePage v. Center for Reproductive Medicine*, SC-2022-0515 (2024). Petitioner objected (trial transcript, JA298, JA299), as in certain other adverse rulings by the district court.

The sentencing hearing occurred on July 31, 2024. The assistant U.S. attorney and the district court judge identified eight convictions which the Petitioner had. The assistant U.S. attorney and the district court judge each claimed that because of the Petitioner's record, incarceration longer than previous incarcerations was necessary. No mention by either the district court judge or the assistant U.S. attorney was made of the fact that the most recent arrest for interposing at an "abortion" center (such as in the present case on November 15, 2022) was in 1993, over thirty years prior.

Despite Petitioner's attempt to address to the district court the fact the last such arrest for interposing at an "abortion" center was in 1993 (sentencing hearing transcript JA326), the district court marched forward with a sentence including federal prison (60 days sentence) and a \$1,000 fine. The assistant U.S. attorney had asked for a 90-day sentence and \$5,000 fine. Petitioner actually served 59 days at the Williamsburg FCI satellite camp in Salters, SC from September 17, 2024 – November 14, 2024, and paid the \$1,000 fine (certain other discussion of the length of incarceration, fine, and the Petitioner's past record can be seen at sentencing hearing transcript JA315, JA316, JA317, JA318, JA319, JA321, JA322, JA325, JA326, JA379).

At the sentencing hearing, Petitioner confirmed with the judge that both the motion to dismiss the FACE Act violation charge, and the defense reply to the government response in opposition were preserved as issues on appeal having been denied by the district court, which ruling by the court had been objected to by the Petitioner (sentencing hearing transcript JA326, JA327). Petitioner likewise confirmed with the judge that the court's denial of the motion for allowance of a defense of necessity and the reply to the government's response in opposition, were likewise preserved as issues on appeal (sentencing hearing transcript JA327, JA328). Finally, Petitioner inquired of the district court judge about a February 14, 2024 filing entitled Petition to the Court to Acknowledge the Declaration of Independence Inherently Recognizes the Personhood of All Men****, upon which the Court had not ruled (as of July 31, 2024). The district court judge said he disagreed and ruled against the Petitioner on that. The Petitioner objected for the record (sentencing hearing transcript JA328, JA329).

****** PETITION TO THE COURT TO ACKNOWLEDGE
THE DECLARATION OF INDEPENDENCE INHERENTLY RECOGNIZES
THE PERSONHOOD OF ALL MEN**
ECF No. 79 (Filed Feb 14, 2024)
U.S. District Court for the District of South Carolina (CR. NO. 3:23-00117-JFA)

C. Fourth Circuit Court ruling

A notice of appeal was filed by Petitioner on August 9, 2024. Current court-appointed attorney was appointed August 20, 2024. When shortly prior to the court-appointed attorney filing the

Appellant's Opening Brief, the Petitioner fully comprehended this court-appointed attorney was not going to make ANY of the Biblical and Pro-Life arguments requested by the Appellant, the Appellant filed and sought to have the court-appointed attorney relieved (See ECF No. 20, January 9, 2025 and ECF No. 27, January 10, 2025, United States Court of Appeals for the Fourth Circuit, No. 24-4419). The Fourth Circuit denied that motion, while at the same time, in the same Order, allowing Appellant to "[seek] leave to file a pro se supplemental brief, accompanied by the pro se supplemental brief."

"Upon consideration of appellant's motion to relieve counsel, the court denies the motion without prejudice to appellant seeking leave to file a pro se supplemental brief, accompanied by the pro se supplemental brief."

(ECF No. 28, January 15, 2025, United States Court of Appeals for the Fourth Circuit, No. 24-4419).

Petitioner subsequently filed a Pro Se Supplemental Brief on February 7, 2025, ECF No. 32, and then later filed an Amended Pro Se Supplemental Brief on August 12, 2025, ECF No. 52.

PRO SE SUPPLEMENTAL BRIEF

ECF No. 32 (Filed Feb 7, 2025)

United States Court of Appeals for the Fourth Circuit (No. 24-4419)

AMENDED PRO SE SUPPLEMENTAL BRIEF

ECF No. 52 (Filed Aug 12, 2025)

United States Court of Appeals for the Fourth Circuit (No. 24-4419)

Oral Argument was conducted in Richmond, Virginia before a three-judge panel of the Fourth Circuit Court of Appeals on September 12, 2025. Only the court-appointed attorney was allowed to speak and argue before the three-judge panel, despite the Petitioner's motion filed to participate in oral argument (ECF No. 53, August 25, 2025, United States Court of Appeals for the Fourth Circuit, No. 24-4419), which was quickly denied (ECF No. 54, August 28, 2025, United States Court of Appeals for the Fourth Circuit, No. 24-4419). At the Fourth Circuit three-judge panel oral argument, the named Appellant of the Appeal, i.e. the present Petitioner, was not invited

to sit at the attorney table (unlike proceedings at the U.S. District Court in South Carolina), but was rather seated behind the bar with the audience throughout. That seems a fitting symbolic picture of the general disenfranchisement of the Appellant from his own Appeal wherein NOT ANY of the Appellant's Issues on Appeal, for which he brought the appeal, were either briefed or argued by the court-appointed attorney, and, as stated above, the Fourth Circuit even denied the Appellant's motion seeking to participate in the oral argument September 12, 2025.

The Fourth Circuit panel published their 2-1 decision and opinion affirming the judgment of the district court on May 1, 2026 (ECF No. 58, United States Court of Appeals for the Fourth Circuit, No. 24-4419). The docket entry for ECF No. 58 on PACER explicitly includes the statement:

PUBLISHED AUTHORED OPINION filed. Motion disposition in opinion granting motion to file supplemental brief(s) [31]; denying motion to file supplemental brief(s) [51].

This is in reference to the Pro Se Supplemental Brief (ECF No. 32, Filed Feb 7, 2025) and the Amended Pro Se Supplemental Brief (ECF No. 52, Filed Aug 12, 2025) filed by the Appellant.

The May 1, 2026 Published Opinion **GRANTED** Appellant's motion for leave to file a pro se supplemental brief in ECF 31 (February 7, 2025), which referred to Appellant's pro se supplemental brief ECF 32-1 (February 7, 2025) and Exhibits A-M - ECF-32-2 (February 7, 2025).

The May 1, 2026 Published Opinion also **DENIED** Appellant's later motion for leave to file an amended pro se supplemental brief in ECF 51 (August 12, 2025) which was Appellant's amendment (ECF 52, August 12, 2025) only to ECF 32-1 (February 7, 2025), with Exhibits A-M remaining the same as filed in ECF-32-2 (February 7, 2025).

The Fourth Circuit court panel granted the Appellant's pro se motion for leave to file a pro se supplemental brief (ECF 32-1 and ECF 32-2) but then declared the brief, which contained multiple Scriptural, Scientific, and Legal arguments, upholding the Appellant's Biblical and Pro-Life position, as having "no merit".

The Fourth Circuit court panel denied the Appellant's pro se motion for leave to file an amended

pro se supplemental brief (ECF 52) which contained all the arguments of the first brief (ECF 32-1 and ECF 32-2), plus two additional, a U.S. District Court Judge's Order, and also a South Dakota state statute upheld by the 8th Circuit Court of Appeals.

The initial pro se supplemental brief (ECF 32-1 (February 7, 2025)) with accompanying Exhibits A-M - ECF-32-2 (February 7, 2025)), references:

- 1) The Declaration of Independence (Pet.App.F, Exhibit A)
- 2) The United States Constitution
- 3) The South Carolina State Constitution
- 4) An opinion concurring with the majority in a 2023 South Carolina State Supreme Court Opinion: *Planned Parenthood South Atlantic, et al. v. State of South Carolina, et al.*, 438 S.C. 188 (2023)
- 5) Both the majority opinion and a concurring specially opinion in a 2024 Alabama State Supreme Court Opinion: *James LePage, et al. v. The Center for Reproductive Medicine and Mobile Infirmary Association* (2024), Alabama, Case Number SC-2022-0515
- 6) A dissenting opinion in a 2024 Florida State Supreme Court Opinion: *Advisory Opinion to the Attorney General Re: Limiting Government Interference With Abortion*, No. SC2023-1392 (2024), Florida Supreme Court
- 7) United States Supreme Court Opinion, *Rector, Etc., of Holy Trinity Church v. U.S.* (143 U.S. 457)

Then, on top of effectually declaring all of that content above as having "no merit" in application to this case, the court panel also, without explanation, denied the motion to file the amended pro se supplemental brief (ECF 52, August 12, 2025), which included all the above PLUS references to:

- 1) A US District Court Order by Judge Laplante:
"Barbara," et al. v. Donald J. Trump, President of the United States, in his official capacity, et al., Civil No. 25-cv-244-JL-AJ, District of New Hampshire (2025)
- 2) A South Dakota law upheld by the Eighth Circuit Court of Appeals:
South Dakota House Bill 1166 enacted in 2005, upheld by the 8th Circuit Court of Appeals in *Planned Parenthood Minnesota, et al v. Mike Rounds, et al*, No. 09-3362 (8th Cir. 2011)

ECF 58
PUBLISHED AUTHORED OPINION
May 1, 2026
FN #5, Page 5
[excerpts]

"The panel grants the motion as to the first pro se supplemental brief [ECF 31 (February 7, 2025)] and denies the later-filed motion for an amended pro se supplemental brief [ECF 52, August 12, 2025].

"Upon review, the majority finds no merit in the additional arguments raised in the supplemental brief. To the extent Lefemine contests the continued wisdom of the FACE Act on non-statutory grounds, we are not at liberty to act ..."

Note: Appellant Lefemine's arguments significantly exceed contesting "the continued wisdom of the FACE Act on non-statutory grounds". The court panel's claim "we are not liberty to act" does not apply to other arguments made by Lefemine upon which the court panel chose not to act.

[See FN #5 in its entirety on Page 5 of the PUBLISHED AUTHORED OPINION at Pet.App.A1.]

The Fourth Circuit court panel states in the above footnote on page 5, in part:

"To the extent Lefemine contests the continued wisdom of the FACE Act on non-statutory grounds, we are not at liberty to act ..."

However, the two pro se supplemental briefs go far beyond only contesting the FACE Act.

As explained previously in the Introduction, these are the Petitioner's three foremost issues:

- 1) God's Law is the rightful, just basis for man's law.
- 2) Human life begins at conception; A human being exists at conception.
- 3) Every human being has a Creator God-given, inherent, unalienable right to life as a natural "person" which should rightly be recognized in law as legal personhood.

The Fourth Circuit court panel did not substantively adjudicate upon ANY of the Appellant's Issues on Appeal. The Fourth Circuit court panel has not demonstrated substantive engagement with the Appellant's arguments beyond the statements: "Upon review, the majority finds no merit in the additional arguments raised in the supplemental brief. To the extent Lefemine contests the continued wisdom of the FACE Act on non-statutory grounds, we are not at liberty to act as "[t]he Federal Judiciary does not have the power to excise, erase, alter, or otherwise strike down a statute." [citation provided]

So essentially, the Fourth Circuit court panel claims it finds no merit in the Appellant's arguments referencing these and other sources cited in the Appellant's initial pro se supplemental brief, as applied to the present case:

- 1) The Declaration of Independence
- 2) The United States Constitution
- 3) The South Carolina State Constitution
- 4) An opinion concurring with the majority in a 2023 South Carolina State Supreme Court Opinion: *Planned Parenthood South Atlantic, et al. v. State of South Carolina, et al.*, 438 S.C. 188 (2023)
- 5) Both the majority opinion and a concurring specially opinion in a 2024 Alabama State Supreme Court Opinion: *James LePage, et al. v. The Center for Reproductive Medicine and Mobile Infirmary Association* (2024), Alabama, Case Number SC-2022-0515
- 6) A dissenting opinion in a 2024 Florida State Supreme Court Opinion: *Advisory Opinion to the Attorney General Re: Limiting Government Interference With Abortion*, No. SC2023-1392 (2024), Florida Supreme Court
- 7) United States Supreme Court Opinion, *Rector, Etc., of Holy Trinity Church v. U.S.* (143 U.S. 457)

Petition for Rehearing and Rehearing En Banc

Appellant filed a pro se motion for leave to file a pro se supplemental petition for rehearing and rehearing en banc (ECF No. 62, May 22, 2026, United States Court of Appeals for the Fourth Circuit, No. 24-4419), and pro se petition for rehearing and rehearing en banc (ECF No. 63, May 22, 2026, United States Court of Appeals for the Fourth Circuit, No. 24-4419). ECF No. 63 was later marked on the docket as “(ENTRY RESTRICTED)”.

Appellant’s first submission of documents for filing at ECF No. 62 and ECF No. 63 were unexplainably temporarily “lost” in the USPS mail for several days, and so Appellant attempted to file replacement documents “out of time” for each (ECF No. 64, May 22, 2026, United States Court of Appeals for the Fourth Circuit, No. 24-4419).

The Fourth Circuit court panel denied motions at ECF No. 62, ECF No. 64, and an amended/ corrected motion at ECF No. 65, and “administratively terminated” the pro se petition for rehearing and rehearing en banc at ECF No. 63 (ECF No. 67, June 2, 2026, United States Court of Appeals for the Fourth Circuit, No. 24-4419). Is this not more judicial disenfranchisement of the Appellant ?

REASONS FOR GRANTING THE WRIT

America is at a critical, existential juncture. For over 75 years, at least since 1947, the Court has repeatedly issued certain rulings and opinions contrary to the vision of our nation’s Founders, as expressed in America’s Founding Document, the 1776 Declaration of Independence. As recently as 1892, this Court stated “... this is a Christian nation.” (*Rector, Etc., of Holy Trinity Church v. United States*, 143 U.S. 457 (1892)). While the 1776 Declaration of Independence remains part of the US Code as one of four Organic Laws of the United States, the foundation of America’s jurisprudence as expressed in the first sentence, “the Laws of Nature and of Nature’s God”, is greatly ignored and violated, and in no small measure, as a consequence of multiple rulings and opinions of the Court over the last 75 years. This instant case is an opportunity for remediation.

Contrast the current state of American jurisprudence with the words of men who were pillars in America's founding:

John Adams: "... We have no Government armed with Power capable of contending with human Passions unbridled by morality and Religion. ... Our Constitution was made only for a moral and religious people. It is wholly inadequate to the government of any other."

(Letter from John Adams to the Massachusetts Militia October 11, 1798)

[Member, 5-man committee to draft the Declaration of Independence; Signer thereof; first Vice President of the United States, second President of the United States]

John Jay: "Providence has given to our people the choice of their rulers, and it is the duty, as well as the privilege and interest of our Christian nation, to select and prefer Christians for their rulers."

(Letter from John Jay to John Murray, Jr. Oct 12, 1816, *The Correspondence and Public Papers of John Jay*, vol. 4 (1794-1824), (New York: G.P. Putnam's Sons, 1893), pp. 393-394.)

[Co-author, *The Federalist Papers*; first Chief Justice of the United States Supreme Court]

George Washington: "Of all the dispositions and habits which lead to political prosperity, religion and morality are indispensable supports. In vain would that man claim the tribute of patriotism who should labor to subvert these great pillars of human happiness, these firmest props of the duties of men and citizens. The mere politician, equally with the pious man, ought to respect and to cherish them. A volume could not trace their connections with private and public felicity. Let it simply be asked where is the security for property, for reputation, and for life, if the sense of religious obligation *desert* the oaths, which are the instruments of Investigation in Courts of Justice? And let us with caution indulge the supposition that morality can be maintained without religion. Whatever may be conceded to the influence of refined education on minds of peculiar structure, reason and experience both forbid us to expect that national morality can prevail in exclusion of religious principle."

(President George Washington's Farewell Address, published September 19, 1796 in Philadelphia's *American Daily Advertiser*)

[Father of our Country; Commander-in-Chief Continental Army; President Constitutional Convention; first President of the United States]

The indisputable justification by the Founders of America's right to exist as a "separate and equal" nation "among the powers of the earth", as expressed in our nation's Founding Document, the 1776 Declaration of Independence, at America's birth is upon "the Laws of Nature and of Nature's God".

Such is also an expression of the foundation of American jurisprudence. Our country greatly and seriously needs, and would inestimably benefit from, this Court re-affirming our nation's roots in law and jurisprudence as founded upon "the Laws of Nature and of Nature's God". This case provides a unique opportunity for this Court to do so. It is a matter of immutable, authoritative, universal, and divine truth that "Blessed is the nation whose God is the LORD; ..." Psalm 33:12, KJV.

I. The Court should grant certiorari and affirm that "the Laws of Nature and of Nature's God" cited in the 1776 Declaration of Independence are the foundation of America's jurisprudence today.

William Blackstone's *Commentaries on the Laws of England* continues to be an authoritative source of reference in United States Supreme Court opinions (e.g., *Dobbs v. Jackson Women's Health Org.*, 597 U.S. 215 (2022)). In Volume 1, Introduction, Section 2: Of the Nature of Laws in General, Blackstone wrote:

"Man, considered as a creature, must necessarily be subject to the laws of his creator, for he is entirely a dependent being. ... as man depends absolutely upon his maker for every thing, it is necessary that he should in all points conform to his maker's will. This will of his maker is called the law of nature."

Blackstone wrote:

"This law of nature, being coeval with mankind and dictated by God himself, is of course superior in obligation to any other-It is binding over all the globe in all countries, and at all times; no human laws are of any validity, if contrary to this: ..."

Blackstone wrote:

"The doctrines thus delivered we call the revealed or divine law, and they are to be found only in the holy scriptures."

Blackstone wrote:

"Upon these two foundations, the law of nature and the law of revelation, depend all human laws; that is to say, no human laws should be suffered to contradict these."

Blackstone's *Commentaries* were published in the decade prior to the promulgation of the 1776 Declaration of Independence. There is great consistency between Blackstone's assertion that all human laws are rightly founded upon "the law of nature and the law of revelation", and the words

in the first sentence of the 1776 Declaration of Independence, “the Laws of Nature and of Nature’s God”. In both cases, reference is being made to God’s Law in Nature (General Revelation) and God’s Law in written Revelation (Special Revelation). This is the fundamental, foundational, historical basis of American jurisprudence. This case is an opportunity for the Court to re-affirm this truth.

God’s Law is the rightful, just basis for man’s law

By information, research, and faith, Petitioner believes God’s Law is the rightful, just basis for man’s law; that is, God’s Law in nature, and God’s Law in revelation. America’s past historical record documents the legacy of the core of most of America’s founding legal heritage to be consistent with this truth, with the great notable and tragic exception of unbiblical American Slavery, for which national sin America has paid greatly. The truth of God’s Law being the rightful basis for man’s law undergirds Petitioner’s principled belief that the prosecution and judgment in this case (CR. NO. 3:23-00117-JFA), were unjust, and therefore justly argues for reversal of Petitioner’s conviction and for case dismissal by this Court.

This view that the rightful, just basis for man’s law is God’s Law is absolutely not only the individual “religious” belief of the Petitioner. The historical and legal record contains abundant evidence this was the predominant American view for generations, including as witnessed in the very first sentence of our country’s 1776 Declaration of Independence, i.e., “the thirteen united States of America” declaring the justification of their right to independence: “... to assume among the powers of the earth, the separate and equal station to which the Laws of Nature and of Nature’s God entitles them, ...”. [emphasis added]

Today, the 1776 Declaration of Independence is one of the Organic Laws of the United States, and is found and identified as such, at the beginning of the United States Code of Laws [Pet.App.F., Exhibit A, Sources: Coleman Karesh Law Library, University of South Carolina,

Columbia, SC (hardbound) and uscode.house.gov (online)].

Furthermore, the second sentence of the 1776 Declaration affirms the “self-evident” truth of Creator-endowed unalienable Rights, the first of which is the Right to Life:

“We hold these truths to be self-evident, that all men are created equal, that they are Endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness.”

So the view that these certain Rights come from the Creator and are unalienable, is absolutely not only the individual “religious” belief of the Petitioner, but is written into America’s actual Founding Document, one of the Organic Laws of the United States of America, the 1776 Declaration of Independence. Any legal presumption contrary to this historical fact and “self-evident” truth is erroneous, false, and un-American.

In the 2022 United States Supreme Court *Dobbs* Opinion (597 U.S. 215), William Blackstone is cited numerous times [Pet.App.F., Exhibit F, excerpted pages 217, 238, 242, 243, 244, 245 247, 251, 272]. In the *Dobbs* Syllabus, Blackstone is named among those “great common-law authorities” [Pet.App.F., Exhibit F, page 217]. This Opinion refers to his seminal work published in the 1760’s decade prior to the American Revolution, *Commentaries on the Laws of England*. While the *Dobbs* Opinion is referring to Blackstone’s writings in the “abortion” context, the intent for purposes of this Petition is more fundamental: What is Law ? Where and from Whom does Law rightly come from ? What is Law rightly based upon ? Answers to these questions have direct bearing on the case, *Lefemine v. USA*, CR. NO. 3:23-00117-JFA, and this petition.

The Petitioner cites excerpts from William Blackstone’s *Commentaries on the Laws of England*, INTRODUCTION, Section 2: Of the Nature of Laws in General [Pet.App.F., Exhibit B], as follows:

[<https://lonang.com/wp-content/download/Blackstone-CommentariesBk1.pdf> - pages 25 - 27]

“The doctrines thus delivered we call the revealed or divine law, and they are to be found only in the holy scriptures.” [p.27] [emphasis added]

“Upon these two foundations, the law of nature and the law of revelation, depend all human laws; that is to say, no human laws should be suffered to contradict these.” [p.27] [emphasis added]

“To instance in the case of murder; this is expressly forbidden by the divine, and demonstrably by the natural law; and from these prohibitions arises the true unlawfulness of this crime. Those human laws that annex a punishment to it, do not at all increase its moral guilt, or superadd any fresh obligation *in foro conscientiae* [in the court of conscience] to abstain from its perpetration. Nay, if any human law should allow or enjoin us to commit it, we are bound to transgress that human law, or else we must offend both the natural and the divine.” [p.27] [emphasis added]

Such as in the case with “abortion” itself, which is child-murder. And such as in the case of the unjust, unrighteous 1994 F.A.C.E. Law (Title 18 U.S.C. Section 248), which protects child-murder. These abominations, especially child-murder, are an offense “both [to] the natural and the divine.”

Isaiah 10:1,2 KJV:

“Woe unto them that decree unrighteous decrees, and that write grievousness *which* they have prescribed; To turn aside the needy from judgment, and to take away the right from the poor of my people, that widows may be their prey, and *that* they may rob the fatherless!”

Blackstone’s instruction on “the Nature of Laws in General” is that all human laws rightly depend upon these two foundations: “the law of nature and the law of revelation”. He states previously “the revealed or divine law” is “to be found only in the holy scriptures.”

God’s Word says, “Thou shalt not kill (murder).” Exodus 20:13, KJV. The Lord Jesus Christ says, “Thou shalt do no murder.” Matthew 19:18, KJV. The Petitioner believes “abortion” is murder and that God commands all men everywhere not to commit it. The Bible says “Man (Gr. *anthropos*) shall not live by bread alone, but by every word that proceedeth out of the mouth of God.” Matthew 4:4, KJV. Surely America would be safer if more people obeyed the Sixth Commandment of the Ten Commandments.

Blackstone’s *Commentaries* were used before, and for approximately 100 years after, the American Revolution (1775-1783) to train lawyers in the United States, including at the University of South Carolina School of Law, Columbia, SC during part (1867-1877) of the Reconstruction Era after the USC Law School opened in 1867 [Pet.App.F., Exhibit C; History of the USC Law School was prepared by a former Associate Director for Administration of the Coleman Koresh Law Library, University of South Carolina, Columbia, SC. Included in this history is documentation of the use of Blackstone’s *Commentaries* as part of the USC Law School Curriculum during at least two administrations during the Reconstruction Era. - <https://christianlifeandliberty.net/USC-Law-School-History-Narrative-received-from-Coleman-Karesh-Law-Library-USC-School-of-Law-Feb-4-2016.pdf> - pages 1,2]

The United States Supreme Court Opinion, *Rector, Etc., of Holy Trinity Church v. United States*. (143 U.S. 457) is dated February 29, 1892. It recites and documents many examples of the Christian roots of America, beginning at Section 11 of the Opinion, located on page 7 of Pet.App.F., Exhibit D. [<https://www.law.cornell.edu/supremecourt/text/143/457>]

This Opinion states, "... no purpose of action against religion can be imputed to any legislation, state or national, because this is a religious people. This is historically true."

Included among the many examples of the Christian religion's influence in this 1892 Opinion of the United States Supreme Court, with illustrative historical details and quotations are:

- 1) "The first colonial grant" "made to Sir Walter Raleigh in 1584".
- 2) "The first charter of Virginia, granted by King Charles I" in 1606 (and subsequently in 1609 and 1611).
- 3) "The celebrated compact made by the [P]ilgrims in the Mayflower" in 1620.
- 4) "The fundamental orders of Connecticut, under which a provisional government was instituted in 1638-39".
- 5) The "charter of privileges granted by William Penn to the province of Pennsylvania" in 1701.
- 6) The "[D]eclaration of [I]ndependence recognizes the presence of the Divine in human affairs in these words: 'We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty, and the pursuit of Happiness.' ..."
- 7) "If we examine the constitutions of the various states, we find in them a constant recognition of religious obligations. Every constitution of every one of the 44 states [this is 1892] contains language which, either directly or by clear implication, recognizes a profound reverence for religion, and an assumption that its influence in all human affairs is essential to the well-being of the community."
 - (a) Constitution of Illinois, 1870.
 - (b) Constitution of Indiana, 1816.
 - (c) Constitution of Maryland, 1867 (Articles 36 and 37 of the Declaration of Rights).
 - (d) Constitution of Massachusetts, 1780 (Articles 2 and 3 of Part 1).
 - (e) Constitution of Mississippi, 1832 (Sections 5 and 14 of Article 7).
 - (f) Constitution of Delaware, 1776 (Article 22).
 - (g) Constitution of the United States, 1787.

The Opinion further states, "There is no dissonance in these declarations. There is a universal language pervading them all, having one meaning. They affirm and reaffirm that this is a religious nation. **These are not individual sayings, declarations of private persons. They are organic utterances. They speak the voice of the entire people.**" [emphasis added] [This was written in 1892, about 134 years ago.]

The Opinion lists a number of matters illustrating the influence of Christianity in American life, and then states, "These, and many other matters which might be noticed, add a volume of unofficial declarations to the mass of organic utterances that **this is a Christian nation.**" [emphasis added]

Further, near the conclusion, the Opinion states, "It is the duty of the courts, under those circumstances, to say that, however broad the language of the statute may be, the act, although within the letter, is not within the intention of the legislature, and therefore cannot be within the statute."

In addition to *Rector, Etc., of Holy Trinity Church v. United States*, 143 U.S. 457 (1892), other cases may be cited upholding a similar argument of the historical general Christian foundation of American jurisprudence and law:

- 1) *Updegraph v. Commonwealth*, 11 Serg. & Rawle 394 (Sup.Ct.Penn. 1824)
- 2) *People v. Ruggles*, 8 Johns. 290 (Sup.Ct.NY. 1811)
- 3) *Vidal v. Girard's Executors*, 43 U.S. 127 (1844)
- 4) *Commonwealth v. Kneeland*, 37 Mass. 206, Supreme Court of Massachusetts (1838)
- 5) *M'Creery's Lessee v. Allender*, 4 H. & Mett. 259, Supreme Court of Maryland (1799)
- 6) *Runkel v. Winemiller*, 4 Harris & McHenry 448, Maryland Court of Appeals (1799)
- 7) *Commonwealth v. Sharpless*, 2 Serg. & Rawle 91 (Sup.Ct.Penn. 1815)
- 8) *Davis v. Beason*, 133 U.S. 333 (1890)
- 9) *Murphy v. Ramsey*, 114 U.S. 15 (1885)
- 10) *City Council of Charleston v. Benjamin*, 33 S.C.L. 508 (Supreme Court of South Carolina, 1848)
- 11) *Lindenmuller v. The People*, 33 Barbour Reports 548 (Sup.Ct.NY 1861)
- 12) *Shover v. State*, 5 Ark. 259 (Supreme Court of Arkansas, 1850)
- 13) *Commonwealth v. Nesbit*, 34 Pa. 398 (Supreme Court of Pennsylvania, 1859)
- 14) *United States v. Macintosh*, 283 U.S. 605 (1931)
- 15) *Zorach v. Clauston*, 343 U.S. 306 (1952)

This list of cases is sourced from *Original Intent: The Courts, The Constitution, and Religion*, by David Barton, Copyright 2000, 3rd edition, 2004. Citations were researched on various other online sources, including Maryland State Archives.

These cases, representing adjudication in multiple States, over the course of approximately 150 years, demonstrate some of the judicial evidence for the assertion of the historical general Christian foundation of American jurisprudence and law, up until the mid-twentieth century.

While quotations from and further descriptions of these 15 cases have not been provided in this petition for a writ of certiorari, should the Court grant the petition and order briefs on the merits of the case, it is the intent of the Petitioner to provide quotations from and further descriptions of these cases therein.

Conversely, since 1947, the Court has repeatedly issued rulings and opinions which have undermined the moral and spiritual integrity and strength of the nation. Why was this done, in view of our Founders' understanding of the fundamental connections between religion, morality, virtue and the benefits of liberty and political prosperity ? Founding Father Benjamin Rush, a signer of the Declaration of Independence, wrote in his 1786 essay, 'Thoughts Upon the Mode of Education Proper in a Republic', "... without virtue there can be no liberty":

“... the only foundation for a useful education in a republic is to be laid in RELIGION. Without this, there can be no virtue, and without virtue there can be no liberty, and liberty is the object and life of all republican governments.”

John Adams wrote in a letter to Mercy Warren (April 16, 1776):

“Public Virtue cannot exist in a Nation without private, and public Virtue is the only foundation of Republics. There must be a positive Passion for the public good, the public Interest, Honour, Power and Glory, established in the Minds of the People, or there can be no Republican Government, nor any real Liberty: ...”

Yet, since 1947, the United States Supreme Court has repeatedly issued certain rulings and opinions which have worked to undermine the moral and spiritual integrity and strength of the nation, thereby threatening America's liberty and political prosperity:

- 1) *Everson v. Board of Education*, 330 U.S. 1 (1947)
- 2) *McCullum v. Board of Education*, 333 U.S. 203 (1948)
- 3) *Engel v. Vitale*, 370 U.S. 421 (1962)
- 4) *School District of Abington Township v. Schempp*, 374 U.S. 203 (1963)
- 5) *Griswold v. Connecticut*, 381 U.S. 479 (1965)
- 6) *Epperson v. Arkansas*, 393 U.S. 97 (1968)
- 7) *Eisenstadt v. Baird*, 405 U.S. 438 (1972)
- 8) *Roe v. Wade*, 410 U.S. 113 (1973)
- 9) *Doe v. Bolton*, 410 U.S. 179 (1973)
- 10) *Stone v. Graham*, 449 U.S. 39 (1980)
- 11) *Wallace v. Jaffree*, 472 U.S. 38 (1985)
- 12) *Lee v. Weisman*, 505 U.S. 577 (1992)
- 13) *Planned Parenthood of Southeastern Pa. v. Casey*, 505 U.S. 833 (1992)
- 14) *Lawrence v. Texas*, 539 U.S. 558 (2003)
- 15) *Obergefell v. Hodges*, 576 U.S. 644 (2015)

This selective list of cases is sourced from *Original Intent: The Courts, The Constitution, and Religion*, by David Barton, Copyright 2000, 3rd edition, 2004; and also from *Dobbs v.*

Jackson Women's Health Org., 597 U.S. 215, 330-336 (2022) (THOMAS, J., concurring); and also from Petitioner's recollection. Citations were researched on various other online sources.

As stated above regarding the previous list of 15 cases (*Updegraph* through *Zorach*), should the Court grant the petition and order briefs on the merits of the case, Petitioner intends to provide quotations from and further descriptions of these latter 15 cases therein also.

Although certain rulings of the Court such as *Dobbs v. Jackson Women's Health Org.*,

597 U.S. 215 have served to ameliorate damage done to the country by other prior rulings, nevertheless, as Justice Thomas wrote in *Dobbs*, 597 U.S., at 336 (THOMAS, J., concurring):

“Now today, the Court rightly overrules *Roe* and *Casey*—two of this Court's “most notoriously incorrect” substantive due process decisions, *Timbs*, 586 U. S., at — (opinion of Thomas, J.)—after more than 63 million abortions have been performed, ...”

After almost half a century (1973 – 2022) the Court finally overruled *Roe* and *Casey*, but that did not erase the “more than 63 million abortions” which had been committed, nor all the harm done to individual women and men in America who have participated in this grievous sin and crime, nor the immense corporate consequences from the loss of respect for the sanctity of human life demonstrated by almost 50 years of government-protected child-murder by “abortion”, such as the resultant effect on the lack of respect for the sanctity of human life among certain of those in younger generations.

Hosea 4:6, KJV

“My people are destroyed for lack of knowledge. Because thou hast rejected knowledge, I will also reject thee, ...: seeing thou hast forgotten the law of thy God, I will also forget thy children.”

Hosea 4:2, KJV

“... blood toucheth blood.”

Bloodshed follows Bloodshed. Violence on the streets follows the violence in the womb.

No, *Dobbs* did not “establish Justice” as the Preamble of the United States Constitution requires. “Abortions” in one form or another, by one means or another, are still being committed in every State in the Union. And then too, because Justice has not been established in the form of legal personhood for all human beings, at fertilization, without exception, there is also the ongoing massive destruction of human life attendant with eugenic in vitro fertilization (IVF). It is well past time for the Court to exercise its constitutional authority and duty to “establish Justice” in regard to respect for the sanctity of all human life, and affirm the foundation of

American jurisprudence to be based upon “the Laws of Nature and of Nature’s God”, the words contained in the very first sentence of America’s Founding Document. In this very case, the Court has a unique opportunity and an ideal vehicle to do so, and the Court should grant this petition.

II. The Court should grant certiorari to decide whether the overwhelming body of scientific evidence that human biological life begins at fertilization requires present recognition of this scientific fact universally in the law.

As a matter of science, the evidence and consensus is overwhelming that human life begins at fertilization; for example:

National Institutes of Health (NIH)
National Library of Medicine

‘The Scientific Consensus on When a Human’s Life Begins’

<https://pubmed.ncbi.nlm.nih.gov/36629778/>

Steven Andrew Jacobs

J.D., Northwestern University School of Law, 2016; Ph.D., The University of Chicago, 2019.

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Excerpts from Abstract:

“Peer-reviewed journals in the biological and life sciences literature have published articles that represent the biological view that a human’s life begins at fertilization (“the fertilization view”). As those statements are typically offered without explanation or citation, the fertilization view seems to be uncontested by the editors, reviewers, and authors who contribute to scientific journals. However, Americans are split on whether the fertilization view is a “philosophical or religious belief” (45%) or a “biological and scientific fact” (46%), and only 38% of Americans view fertilization as the starting point of a human’s life.

Continued...

“Biologists from 1,058 academic institutions around the world assessed survey items on when a human’s life begins and, overall, 96% (5337 out of 5577) affirmed the fertilization view. The founding principles of the field Science Communication suggest that scientists have an ethical and professional obligation to inform Americans, as well as people around the world, about scientific developments so members of the public can be empowered to make life decisions that are consistent with the best information available. Given that perspective-and a recent study’s finding that a majority of Americans believe they deserve to know when a human’s life begins in order to make informed reproductive decisions-science communicators should work to increase the level of science awareness on the fertilization view, as it stands alone as the leading biological perspective on when a human’s life begins.”

This case presents an opportunity for the Court to reconcile the American public to the scientific

truth that human life begins at fertilization, "so members of the public can be empowered to make life decisions that are consistent with the best information available", and that justice would be established in matters affecting the preservation or potential destruction of human life. The Court should provide this clarification for the American public to, Lord willing, better understand the serious consequences of the overwhelming scientific evidence human life begins at fertilization.

Human life begins at conception; A human being exists at conception

There are many reasons I believe a living human being exists inside the womb of a pregnant woman, beginning at conception/fertilization: Scriptural; biological, scientific, and medical; and legal.

Starting with Scriptural, for example, Genesis 1:27 says, "So God created man in His own image, in the image of God created He him; male and female created He them." Jeremiah 1:5 begins, "Before I [God] formed thee in the belly I knew thee;..." The Bible uses the Greek word *brephos* translated "babe" to refer to both a child in the womb (John the Baptist in Luke 1:41, 44) and to a small child in a manger (Jesus Christ in Luke 2:12, 16). In God's eyes, such a child is a babe or *brephos* both inside and outside the womb. [See also Psalm 51:5, KJV.]

Next considering one legal reason, for example. As stated before, our country's 1776 Declaration of Independence is one of the Organic Laws of the United States, seen at the beginning of the United States Code of Laws. The well-known second sentence states, "We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness." So the organic law of the United States says we have a Creator Who has endowed us with the unalienable right to life, among others. It is a right which cannot be taken away unjustly by Government. Since the organic law of the United States declares all men are created equal, and Creator-endowed with certain unalienable rights, among which the first is "Life", then personhood for all men is inherently recognized by the 1776 Declaration of Independence.

**United States Code
Organic Laws**

<https://uscode.house.gov/browse/frontmatter/organiclaws&edition=prelim>

‘Declaration of Independence: A Transcription’

National Archives

<https://www.archives.gov/founding-docs/declaration-transcript>

If human life begins at fertilization, then so does the unalienable Creator-endowed right to life referred to in the Declaration of Independence. Herein further evidence following shows human life begins at fertilization/conception.

In 1981, a U.S. Senate Judiciary Subcommittee conducted eight days of Hearings, and heard 57 witnesses on The Human Life Bill S.158 [<https://www.govtrack.us/congress/bills/97/s158/summary>], which was federal personhood legislation. The U.S. Senate Judiciary Subcommittee Chairman’s Report [16-page extract: <http://christianlifeandliberty.net/Human-Life-Bill-S158-REPORT-US-Senate-Judiciary-Subcomm-Hearings-Apr-23-to-Jun-18-1981-16-pages-extract.pdf>] [Pet.App.F., Exhibit E]

presented an Amended version of the bill which included Congress finding “that **the life of each human being begins at conception**”, and “that for the purpose of enforcing the obligation of the States under the fourteenth amendment not to deprive persons of life without due process of law, **each human life exists from conception**”, and “for this purpose “person” includes all human beings.” [emphasis added]

The U.S. Senate Judiciary Subcommittee Report further stated: “The purpose of S.158 is first, to recognize **the biological fact that the life of each human being begins at conception;...**” [emph. added]

The Report states, “The Declaration of Independence holds that the right to life is a self-evident, inalienable right of every human being. Embodied in the statement that “all men are created equal” is the idea of the intrinsic worth and equal value of every human life. The author of the Declaration, Thomas Jefferson, explained in later years that “[t]he care of human life and happiness, and not their destruction, is the first and only legitimate object of good government.”

Over 40 years ago, this 1981 U.S. Senate Judiciary Subcommittee Report answered the scientific question: When does a human life begin, stating in part,

“The testimony of these witnesses and the voluminous submissions received by the Subcommittee demonstrate that contemporary scientific evidence points to a clear conclusion: the life of a human being begins at conception, the time when the process of fertilization is complete.” [emphasis added]

[Quotations from Dr. Jerome Lejeune, Dr. Watson Bowes, and Dr. Hymie Gordon, are on page 9 of the Chairman’s Subcommittee Report.]

The Report continues, “The scientific consensus on the biological fact of the beginning of each life has existed ever since the medical and scientific communities became aware of the process of conception in the mid-nineteenth century.” [emphasis added]

Then on page 13, the Report states, “If the United States government is to give reasonable consideration to the abortion issue it must start from the fact that unborn children are human beings.” [emphasis added]

In the few pages provided from the “Mayo Clinic Complete Book of Pregnancy & Baby’s First Year” at Pet.App.F., Exhibit G [Robert V. Johnson, M.D., Editor-in-Chief, Copyright © 1994 by Mayo Foundation for Medical Education and Research], there is biological, scientific, and medical evidence for the humanity of the unborn child in the womb beginning at “the instant of fertilization”.

In Part One – Pregnancy, Chapter Three – How Your Baby Develops, on page 27 is stated:

“Whether you will have a boy or girl is determined at the moment your baby is conceived. One pair of the baby’s chromosomes, called sex chromosomes, determines its sex. Females have two chromosomes called X chromosomes. In males, the sex chromosomes are different; one is an X and the other is a Y chromosome. It is the presence of this Y chromosome that determines whether the embryo will develop as a male. Eggs contain only X sex chromosomes. Sperm, however, may contain either X or Y sex chromosomes.” [emphasis added]

“Each month, during your menstrual cycle, a single egg leaves your ovary. This is called ovulation. At the instant of fertilization, sperm and egg join and pool their chromosomes, creating an embryo with a full complement of 23 pairs, or a total of 46 chromosomes. If a sperm containing an X chromosome meets the egg, a female embryo (with two X chromosomes) will result. If a sperm containing a Y chromosome joins the X chromosome in the egg, the embryo will be male. In this way, it is always the father’s contribution that determines the sex of the fetus.” [emphasis added]

The accompanying color graphic illustration and pictures at Exhibit G are from p. A1 and p. A2 of the same source: the “Mayo Clinic Complete Book of Pregnancy & Baby’s First Year”. On page A1 is this statement: “Fertilization occurs (3) when one sperm penetrates the covering shell of nutrient cells that make up the wall of the ovum (see enlarged photo at left).” Pictures on p. A2 show embryos at 5 weeks old, 6 weeks old, 9 weeks old (fetus), and 17 weeks old. Embryos are human beings.

Then there is the reprint of Lennart Nilsson’s ‘Drama of Life Before Birth’ Landmark Photo Essay first published in the April 30, 1965 issue of LIFE magazine, included herein as Pet.App.F., Exhibit H. The article at Exhibit H is not the 1965 LIFE magazine original, but a March 2013 article by Ben Cosgrove posted at both <https://www.life.com> and at <https://time.com> (just the first page of the article posted at time.com is included at Exhibit H, to provide the March 4, 2013 date of its publication).

The photos of human life in the womb at 3 1/2 weeks, 4 weeks, 5 weeks, 6 weeks, 6 1/2 weeks (2), 8 weeks, 11 weeks, 12 weeks, 16 weeks, 18 weeks, and 28 weeks testify photographically to the life and humanity of the human being growing inside a pregnant woman's womb.

So based upon even a limited sample of Scriptural; biological, scientific, and medical; and legal evidence, I believe a living human being exists inside the wombs of clients who show up for "abortion" appointments at the Columbia Planned Parenthood "abortion" center, which according to SC DHEC statistics destroyed the lives of 1,956 unborn children in CY 2022, and has destroyed over 59,000 unborn children in the 45 years inclusive from 1978 to 2022.

"Abortions" Committed in SC by Facility in 2022 (SC DHEC)

<http://christianlifeandliberty.net/2023-08-26-SC-DHEC-Abortions-by-Occurrence-in-SC-2022.pdf>

Over 423,000 unborn children were destroyed by "abortion" in South Carolina, 1970 - 2022.

TOTAL REPORTED "ABORTIONS" IN SOUTH CAROLINA:

<http://christianlifeandliberty.net/Statistics.htm>

III. The Court should grant certiorari to decide whether the Creator God-given, inherent, unalienable right to life of every human being as a natural person, together with the preceding as affirmative premises, requires as self-evident truth, the logical necessity of present recognition in the law of every human being as a legal person, beginning at fertilization.

By definition, all human beings are natural persons (Black's Law Dictionary, 2009).

Together with the affirmation that "the Laws of Nature and of Nature's God" cited in the 1776 Declaration of Independence are the foundation of America's jurisprudence today; and also with the affirmation that the overwhelming body of scientific evidence that human biological life begins at fertilization requires present recognition of this scientific fact universally in the law, requires therefore as self-evident truth, the logical necessity of present recognition in the law of every human being as a legal person, beginning at fertilization.

Every human being has a Creator God-given, inherent, unalienable right to life as a natural "person" which should rightly be recognized in law as legal personhood

Based on science and law, the Petitioner believes the human beings living within the wombs of women entering Planned Parenthood for "abortion" appointments are **natural persons**, and ought rightfully to be recognized BY THIS COURT as **legal persons**.

All human beings are **natural persons** by definition. Black's Law Dictionary (Ninth Edition) defines "person" firstly, as "A human being." "Also termed *natural person*." Petitioner reasonably believes children living within the wombs of their mothers are natural persons based on his information,

belief, and research, and that they ought rightfully to be recognized as **legal persons**, constitutionally protecting their Creator God-given, inherent, unalienable right to life, BY THIS COURT.

Black's Law Dictionary (2009): Person = "A Human Being"

<http://christianlifeandliberty.net/2013-12-11-Blacks-Law-Dictionary-2009-Person=A-Human-Being.pdf>

In *Planned Parenthood South Atlantic, et al. v. State of South Carolina, et al.*, 438 S.C. 188 (2023), South Carolina Supreme Court Justice Few (concurring with the Majority/Lead Opinion) stated:

“In other words, if the State were to pass a total ban on abortion – despite a complete invasion of a pregnant woman’s right to privacy – the privacy invasion might be reasonable under article I, section 10, because “human life” has no countervailing interest; human life simply must be preserved.”

[emphasis added]

**SUPREME COURT OF SOUTH CAROLINA
Opinion No. 28127**

Planned Parenthood South Atlantic, et al. v. State of South Carolina, et al.
Heard October 19, 2022 – Filed January 5, 2023

Note: See also p.77 of Exhibit A of ECF No. 77, Motion for Allowance of Defense of Necessity, Re: USA v. Steven Clark Lefemine (3:23-117), for pages 1, 2, 5, 75-81, and 90 of South Carolina Supreme Court Opinion No. 28127

<http://christianlifeandliberty.net/SC-Supreme-Court-Opinion-Heartbeat-Law-Jan-5-2023-pages-1-2-5-75-through-81-90.pdf>

In *James LePage, et al. v. The Center for Reproductive Medicine and Mobile Infirmary Assoc* (2024), Alabama Supreme Court Justice Mitchell (authoring the Majority Opinion, beginning p. 2), and Alabama Supreme Court Chief Justice Parker (concurring specially, beginning p. 26), made statements as follows:

MITCHELL, Justice. [Majority Opinion] [begin p. 2]

“All parties to these cases, like all members of this Court, agree that an unborn child is a genetically unique human being whose life begins at fertilization and ends at death. The parties further agree that an unborn child usually qualifies as a “human life,” “human being,” or “person,” as those words are used in ordinary conversation and in the text of Alabama’s wrongful-death statutes. That is true, as everyone acknowledges, throughout all stages of an unborn child’s development, regardless of viability.” [p. 8] [emphasis added]

"And Blackstone's Commentaries, the leading authority on the common law, expressly grouped the rights of unborn children with the "Rights of Persons," consistently described unborn children as "infant[s]" or "child[ren]," and spoke of such children as sharing in the same right to life that is "inherent by nature in every individual." 1 William Blackstone, Commentaries on the Laws of England 125-26. [fn. 6] Those expressions are in keeping with the United States Supreme Court's recent observation that, even as far back as the 18th century, the unborn were widely recognized as living persons with rights and interests. See Dobbs v. Jackson Women's Health Org., 597 U.S. 215, 246-48 (2022)." [pp. 13-15]

PARKER, Chief Justice (concurring specially). [begin p. 26]

In his Commentaries on the Laws of England, Sir William Blackstone declared that "[l]ife is the immediate gift of God, a right inherent by nature in every individual."¹² [p. 30]

11 Accord the philosophy of the United States of America as expressed in the Declaration of Independence -- "endowed by their Creator with certain unalienable Rights, that among these are Life" The Declaration of Independence para. 2 (U.S. 1776). [p. 30]

"... the principle itself -- that human life is fundamentally distinct from other forms of life and cannot be taken intentionally without justification -- has deep roots that reach back to the creation of man "in the image of God." Genesis 1:27 (King James)." [p. 33]

"... the Geneva Bible, which was the "most popular book in colonial homes,"¹⁵ includes a footnote to Genesis 9:6 that provides: "Therefore to kill man is to deface God's image, and so injury is not only done to man, but also to God." Genesis 9:6 n.2 (Geneva Bible 1599)." [p. 36]

"Finally, the doctrine of the sanctity of life is rooted in the Sixth Commandment: ["Thou shalt not kill (murder)." Exodus 20:13 (King James)]." [p. 36]

"In summary, the theologically based view of the sanctity of life adopted by the People of Alabama encompasses the following: (1) God made every person in His image; (2) each person therefore has a value that far exceeds the ability of human beings to calculate; and (3) human life cannot be wrongfully destroyed without incurring the wrath of a holy God, who views the destruction of His image as an affront to Himself. [Alabama State Constitution] Section 36.06 recognizes that this is true of unborn human life no less than it is of all other human life -- that even before birth, all human beings bear the image of God, and their lives cannot be destroyed without effacing his glory." [pp. 37-38]

"Section 36.06 provides, in relevant part:

"(a) This state acknowledges, declares, and affirms that it is the public policy of this state to recognize and support the sanctity of unborn life and the rights of unborn children, including the right to life.

"(b) This state further acknowledges, declares, and affirms that it is the public policy of this state to ensure the protection of the rights of the unborn child in all manners and measures lawful and appropriate." " [p. 38]

“The People of Alabama have declared the public policy of this State to be that unborn human life is sacred. We believe that each human being, from the moment of conception, is made in the image of God, created by Him to reflect His likeness. It is as if the People of Alabama took what was spoken of the prophet Jeremiah and applied it to every unborn person in this state: ["Before I formed thee in the belly I knew thee; and before thou camest forth out of the womb I sanctified thee,...” Jeremiah 1:5 (King James).] All three branches of government are subject to a constitutional mandate to treat each unborn human life with reverence. Carving out an exception for the people in this case, small as they were, would be unacceptable to the People of this State, who have required us to treat every human being in accordance with the fear of a holy God who made them in His image. For these reasons, and for the reasons stated in the main opinion, I concur.” [p. 48]

SUPREME COURT OF ALABAMA
OCTOBER TERM, 2023-2024
SC-2022-0515

James LePage, et al. v. The Center for Reproductive Medicine and Mobile Infirmary Association
 February 16, 2024

<https://judicial.alabama.gov/appellate/supremecourt>

<https://publicportal-api.alappeals.gov/courts/68f021c4-6a44-4735-9a76-5360b2e8af13/cms/case/343D203A-B13D-463A-8176-C46E3AE4F695/docketentrydocuments/E3D95592-3CBE-4384-AFA6-063D4595AA1D>

Note: The quotes above from Alabama Supreme Court Justice Mitchell and Chief Justice Parker may be seen as cited in the excerpted pages of the *James LePage, et al.* Opinion at Pet.App.F., Exhibit J, except for page 37.

In *Advisory Opinion to the Attorney General Re: Limiting Government Interference With Abortion*, No. SC2023-1392 (2024), Florida Supreme Court Justice Francis (dissents with an opinion) stated:

“The exercise of a “right” to an abortion literally results in a devastating infringement on the right of another person: the right to life. And our Florida Constitution recognizes that “life” is a “basic right” for “[a]ll natural persons.” Art. I, § 2, Fla. Const. One must recognize the unborn’s competing right to life and the State’s moral duty to protect that life.” [emphasis added]

https://supremecourt.flcourts.gov/content/download/2285282/opinion/Opinion_SC2023-1392.pdf

Note: The quote above from Florida Supreme Court Justice Francis may be seen in the excerpted p. 59 from the *Advisory Opinion to the Attorney General, etc.* Opinion included at Pet.App.F., Exhibit K.

The preceding quotes from various State Supreme Court Opinions from South Carolina (2023), Alabama (2024), and Florida (2024) are all from recent, post-*Dobbs* (2022) writings of justices on

those State Supreme Courts, three writing in the Majority (SC (1) and ALA (2)), and one writing in Dissent (FL).

However, as the 1981 U.S. Senate Judiciary Subcommittee Chairman's Report on Hearings conducted on The Human Life Bill S.158 [<https://www.govtrack.us/congress/bills/97/s158/summary>] (which was federal personhood legislation) demonstrates, efforts at the federal level to establish in law the legal personhood of human beings beginning at conception goes back at least well over 40 years.
[16-page extract: <http://christianlifeandliberty.net/Human-Life-Bill-S158-REPORT-US-Senate-Judiciary-Subcomm-Hearings-Apr-23-to-Jun-18-1981-16-pages-extract.pdf>] [Pet.App.F., Exhibit E]

In addition to S.158 in the 97th Congress, the 40th President of the United States, Ronald Reagan, made an official Proclamation (5761) which declared **"the unalienable personhood of every American, from the moment of conception until natural death"** for **National Sanctity of Human Life Day, 1988**, dated **January 14, 1988**. [emphasis added]

Ronald Reagan

40th President of the United States: 1981 - 1989

Proclamation 5761 — National Sanctity of Human Life Day, 1988

January 14, 1988

<https://www.presidency.ucsb.edu/documents/proclamation-5761-national-sanctity-human-life-day-1988>

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By the President of the United States of America

A Proclamation [Excerpts]

"America has given a great gift to the world, a gift that drew upon the accumulated wisdom derived from centuries of experiments in self-government, a gift that has irrevocably changed humanity's future. Our gift is twofold: the declaration, as a cardinal principle of all just law, of the **God-given, unalienable rights** possessed by every human being; and the example of our determination to secure those rights and to defend them against every challenge through the generations. Our declaration and defense of our rights have made us and kept us free and have sent a tide of hope and inspiration around the globe."

"One of those **unalienable rights**, as the **Declaration of Independence** affirms so eloquently, is **the right to life**."

"The **unalienable right to life** is found not only in the **Declaration of Independence** but also in the **Constitution** that every President is sworn to preserve, protect, and defend. **Both the Fifth and Fourteenth Amendments guarantee that no person shall be deprived of life without due process of law.**"

"Now, Therefore, I, Ronald Reagan, President of the United States of America, by virtue of the authority

vested in me by the Constitution and laws of the United States, **do hereby proclaim and declare the unalienable personhood of every American, from the moment of conception until natural death, ...**" [emphasis added]

Ronald Reagan

Presidential Library & Museum

Proclamation 5761 -- National Sanctity of Human Life Day, 1988

January 14, 1988

By the President of the United States of America

A Proclamation

<https://www.reaganlibrary.gov/archives/speech/proclamation-5761-national-sanctity-human-life-day-1988>

**PRESIDENT RONALD REAGAN'S PROCLAMATION 5761 OF JAN. 14, 1988 - 102 STAT. 4947
- NATIONAL SANCTITY OF HUMAN LIFE DAY, 1988**

[<https://www.govinfo.gov/content/pkg/STATUTE-102/pdf/STATUTE-102-Pg4947.pdf>]

Note: This <https://www.govinfo.gov> version of President Ronald Reagan's Proclamation 5761 of Jan. 14, 1988 – 102 STAT. 4947 is included at Pet.App.F., Exhibit L.

Returning back in time over 230 years to 1791, and the Ratification of the Bill of Rights (George Mason is known as the "Father of the Bill of Rights"), the 5th Amendment guarantees the federal government's protection of the right to life of persons:

Constitution of the United States, Fifth Amendment

<https://constitution.congress.gov/constitution/amendment-5/>

"No person shall ...be deprived of life, liberty, or property, without due process of law; ..."

Returning back in time over 150 years to 1868, and the Ratification of the 14th Amendment, the protection of the right to life of persons by the States is constitutionally guaranteed:

Constitution of the United States, Fourteenth Amendment

Section 1

<https://constitution.congress.gov/constitution/amendment-14/>

"...nor shall any State deprive any person of life, liberty, or property, without due process of law;..."

In the Constitution of the State of South Carolina, the protection of the right to life of persons is guaranteed in Article I, Section 3:

Constitution of South Carolina**ARTICLE I - DECLARATION OF RIGHTS**

<https://www.scstatehouse.gov/scconstitution/A01.pdf>

SECTION 3. – "...nor shall any person be deprived of life, liberty, or property without due process of law, nor shall any person be denied the equal protection of the laws."

So the 5th and 14th Amendments to the U.S. Constitution guarantee that no person shall be deprived of life, liberty, or property without due process of law; and Article I, Section 3. of the South Carolina State Constitution guarantees the same.

Based on science and law, the Petitioner believes the human beings living within the wombs of women entering Planned Parenthood for "abortion" appointments are **natural persons**, and ought rightfully to be recognized BY THIS COURT as **legal persons**.

All human beings are **natural persons** by definition. Black's Law Dictionary (Ninth Edition) defines "person" firstly, as "A human being." "Also termed *natural person*." Petitioner reasonably believes children living within the wombs of their mothers are natural persons based on his information, belief, and research, and that they ought rightfully to be recognized as **legal persons**, constitutionally protecting their Creator God-given, inherent, unalienable right to life, BY THIS COURT.

Black's Law Dictionary (2009): Person = "A Human Being"

<http://christianlifeandliberty.net/2013-12-11-Blacks-Law-Dictionary-2009-Person=A-Human-Being.pdf>

The action taken by the Petitioner on November 15, 2022 to interpose between human beings in the womb and those inside the Planned Parenthood "abortion" center who would destroy them, was justified to make an attempt, however weak and of short duration, to prevent the atrocity and abomination of the murder of judicially innocent children inside the wombs of their mothers.

Photographic evidence of the nature of the crimes against humanity committed by those employed at Planned Parenthood in the practice of destroying human beings inside the wombs of their mothers is available by viewing the horrific copyrighted photographs at this website:

'Abortion photos – the victims speak'

<https://abortionno.org/abortion-photos/>

In addition, 17 of those photos at the <https://abortionno.org/abortion-photos/> website have been printed out and provided at Pet.App.F., Exhibit I of this Petition.

United States District Judge Laplante Order Granting Petitioner's Motion For Provisional Class Certification of "future persons" for purpose of (nationwide) preliminary injunctive relief in "Barbara," et al. v. Donald J. Trump, President of the United States, in his official capacity, et al., Civil No. 25-cv-244-JL-AJ (ECF No. 63), District of New Hampshire, July 10, 2025 – appealed to First Circuit Court (No. 25-1861) – Certiorari before Judgment granted – U.S. Supreme Court decision (Docket no. 25-365), June 30, 2026, "The judgment of the District Court for the District of New Hampshire is affirmed."

In a federal immigration law case filed June 27, 2025 ("Barbara" v. Trump), U.S. District Judge Joseph Laplante "issued a nationwide preliminary injunction against former President Trump's executive order attempting to end birthright citizenship for children of noncitizen parents." ('CODIFIED — Rights of the Unborn Protected', Canada Free Press, July 14, 2025; further excerpts from this article included below).

'Final Word: A liberal judge's broad-brush efforts in preserving the rights of illegal aliens unwittingly safeguarded the rights of unborn children.'

'CODIFIED — Rights of the Unborn Protected'

Canada Free Press

July 14, 2025

<https://canadafreepress.com/article/codifiedrights-of-the-unborn-protected>

"While the headlines have focused on immigration, the decision also contains language with potentially historic implications: it formally recognizes a class that includes "future persons", individuals not yet born at the time of the lawsuit."

All human beings are **natural persons** by definition (Black's Law Dictionary, Ninth Edition, 2009). If unborn human beings are rightly recognized as **legal persons**, their Creator God-given inherent, unalienable right to life is protected by statutory and constitutional law, i.e., no so-called "right" to "abortion" exists. [Petitioner]

"The issue that has been opened up is how the court defined "future persons." The text of the certification order explicitly states: "The certified class comprises all current and future persons who are born on or after February 20, 2025..." "

"This language means the injunction applies not only to living infants but also to unborn children who would later be born into the class of affected individuals. In other words, the court recognized the legal protectability of rights accruing to persons not yet born, at least for the narrow purpose of preserving their future citizenship status."

"Possibly unknowingly, the court established a potential precedent for unborn standing."

"What makes Judge Laplante's ruling significant is that, for the first time in a high-profile federal case, a court explicitly acknowledged "future persons" as a certifiable class with protectable interests before birth."

"While the order itself carefully limited this recognition to birthright citizenship, its conceptual threshold is new: it treats the legal interests of the unborn as sufficiently real and immediate to justify an injunction on their behalf."

"One thing is certain: the phrase "future persons," once largely theoretical, has now entered the lexicon of federal judicial orders. If upheld, it could become a foundation stone for arguments over the legal standing and rights of the unborn in the decades ahead."

Judge Laplante's Birthright Citizenship Rulings - July 10, 2025

<https://storage.ning.com/topology/rest/1.0/file/get/13659402272?profile=original>

[See Judge Laplante's "Barbara" v. Trump case Order Granting Petitioners' Motion for Provisional Class Certification and Appointment of Class Counsel at Pet.App.G.]

Supreme Court of the United States

Donald J. Trump, President of the United States, et al., Petitioners v. Barbara, et al.

609 U. S. ____ (2026)

Docket no. 25-365

Decided June 30, 2026

Chief Justice Roberts

Opinion of the Court

"The judgment of the District Court for the District of New Hampshire is affirmed."

- Petitioners' Motion for Classwide Preliminary Injunction granted. *Barbara v. Trump*, No. 25-cv-00244 (D.N.H. July 10, 2025).
- Notice of appeal filed. No. 25-1861 (1st Cir. September 5, 2025).
- Cert. before judgment granted. 607 U.S. 1079 (2025).

The required written "human being advisory" within South Dakota House Bill 1166 enacted in 2005 was upheld by the 8th Circuit Court of Appeals in Planned Parenthood Minnesota, et al v. Mike Rounds, et al, No. 09-3362 (8th Cir. 2011), Filed: September 2, 2011

"Court Description: Civil case - South Dakota Abortion Law. ... This action involves facial challenges to the constitutionality of South Dakota's 2005 law on informed consent to abortion. The

court en banc's opinion upheld the law's human being advisory against a facial challenge, and the portion of the district court's decision reaching the same conclusion is affirmed; ..." (excerpt from JUSTIA U.S. Law entry on the case).

JUSTIA U.S. Law

Planned Parenthood Minnesota, et al v. Mike Rounds, et al,
No. 09-3362 (8th Cir. 2011)

Filed: September 2, 2011

<https://law.justia.com/cases/federal/appellate-courts/ca8/09-3362/093231p-2011-09-02.html>

**United States Court of Appeals
 FOR THE EIGHTH CIRCUIT**

Planned Parenthood Minnesota, et al v. Mike Rounds, et al,
 Nos. 09-3231/3233/3362

Appeals from the United States District Court for the District of South Dakota.

<https://cases.justia.com/federal/appellate-courts/ca8/09-3362/093231p-2011-09-02.pdf?ts=1411168646>

Excerpts:

"In 2005 South Dakota enacted House Bill 1166 (the Act) which is the subject of this action. The Act amended South Dakota's Public Health and Safety Code, expanding the requirements for informed consent to abortion. Under § 7 of the Act, each woman contemplating abortion is to be given oral advisories [fn. 3] twenty four hours in advance of the procedure by the doctor scheduled to perform the abortion or by the doctor's designee. The doctor must give other written advisories at least two hours before the procedure."

"The written advisories required by § 7(1) are to inform the patient"

"(b)That the abortion will terminate the life of a whole, separate, unique, living human being [the human being advisory];" [Continued... (c) and (d)]

"S.D.C.L. § 34-23A-10.1(1)(b)–(d)."

"Because Rounds upheld the human being advisory against a facial challenge, the district court certainly did not err in doing the same. It should therefore be affirmed." [i.e., by the 8th Circuit Court]

The human being advisory under § 7(1) requires that the pregnant woman be told that an abortion "will terminate the life of a whole, separate, unique, living human being." S.D.C.L. § 34-23A-10.1(1)(b)

Taken together with South Dakota's statutory definition of "human being", this "includ[es] the unborn human being during the entire embryonic and fetal ages from fertilization to full gestation." S.D.C.L. § 34-23A-1(4).

All human beings are **natural persons** by definition (Black's Law Dictionary, Ninth Edition, 2009). If unborn human beings are rightly recognized as **legal persons**, their Creator God-given, inherent, unalienable right to life is protected by statutory and constitutional law, i.e., no so-called "right" to "abortion" exists. [Petitioner]

IV. This petition presents pressing and recurring issues of national importance, and of long-term, at least 75 years duration; this case presents this Court with an ideal vehicle to resolve the questions presented.

As seen by the list of 15 post-1947 cases on page 20, the issue of whether "the Laws of Nature and of Nature's God" cited in the 1776 Declaration of Independence are the foundation of America's jurisprudence today has impacted the nation repeatedly and on a recurring basis, on pressing matters of national importance for decades, and has been the source of no small amount of societal turmoil in these United States.

America's existence is based upon "the Laws of Nature and of Nature's God", as expressed at the birth of our nation in the very first sentence of our nation's Founding Document, the 1776 Declaration of Independence. American, indeed Western, Civilization stands or falls upon whether God's eternal moral Law in Nature and God's eternal moral Law in the written Revelation of the Scriptures (the Bible) is manifested in the society, culture, institutions, and law, of our nation, and the other nations.

I pray in Jesus' Name that this Court will keep the main thing the main thing: that God's Law is the rightful just basis for man's law; that human life begins at conception, that a human being exists at conception; and that since by definition human beings are natural persons, that based on these premises, human beings ought rightly be recognized as legal persons, at fertilization, in law, without exception, and thereby protecting our Creator God-given, inherent, unalienable right to life, in statutory and constitutional law, because God's Word says, "Thou shalt not kill [murder]." Exodus 20:13, KJV.

CONCLUSION

The petition for a writ of certiorari should be granted.

Jesus Christ is LORD,



/s/ Steven C. Lefemine

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West Columbia, South Carolina
September 10, 2026