

In The United States District Court for
The District of Maryland

IN THE UNITED STATES COURT OF APPEALS

FOR THE FOURTH CIRCUIT

No. 17-1586

DKC 16CV2897

8:16-cv02897-DKC

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2017 DEC 15 PM 12:23
CLERK OF COURT
BY w DEPUTY

INFORMAL OPENING / MOTION FOR ORAL ARGUMENT

Debra F. Meadows

Plaintiff – Appellant

v.

Charles County Board of Education in Maryland

Keller Transportation, Inc., Helen E. Keller, and E. Keller III Bus Service,

Incorporated, Single Employer

Defendants – Appellee

10 of 16

MEMORANDUM

I, the petitioner Debra Meadows appeals from the United States District Court for the District of Maryland at Greenbelt. Honorable Judge Deborah K. Chasanow DKC16CV2897 and Magistrate Judge Timothy J. Sullivan. I had a 90 day right to sue from EEOC on June 15, 2016. This case was filed on August 18, 2016. The case was filed under the American Disability Act of 1964 and also under misclassification and genetic. I had no other choice but to file this case since I could not get an attorney or council to represent me.

Submitted: August 18, 2016. _____

Decided: Date Unknown _____

Before the honorable Deborah K. Chasanow a schedule order was followed for discoveries Rule 26(a)(1) for December 21, 2016. I can prove that I sent the discoveries on December 21. Judge Deborah Chasanow gave me an order on Document 27 and I gave the defendants Rule 26(a)(1) on December 21, which was also sent to the courts. Then on January 25, 2017 at 9:30 am I attended a court hearing with Magistrate Judge Timothy J. Sullivan. He told me that it was for a protective order against my son, Joshua. However, neither the subject nor the matter had anything to do with my son. He told me to stop writing Senators and told me that I shouldn't be going to the Department of Justice. I told him he

couldn't tell me what to do. He then told me that the court needed discoveries. I told him I already turned in discoveries, and there was no comment. He later admitted that he sent the discoveries back. Judge Sullivan gave me a paper saying the court needed the interrogatories by February 3, 2017, when previously Judge Deborah Chasanow had given me until April 21, 2017 to turn in the interrogatories and the production of documents. The judge changed the scheduling order. I then realized that it would be impossible for me to get witnesses' deposition interrogatories in one week. So I put in a motion to extend my time, but he denied it. Then I put in a motion for my original judge, Judge Chasanow, to be put back on the case. He claimed that Judge Chasanow put him on the case for discoveries, but I can prove that Judge Sullivan sent the discoveries back, as well as telling me that the case was about my son which it was not. Judge Sullivan sent me back a product request, and he changed electronic discoveries dates. I also put in a request for an attorney, that was denied by Judge Sullivan as well. I never received ECF Nos. 33 & 34. My original document 27 was taken out of the system. This court hearing was at 9:30 am on the 25th of January, and not at 3:00 pm like the judge's documents stated. His documents did not state a courtroom either. There were no flags up, no sworn statements, and jurisdiction wasn't even established. I was very shocked because I didn't even know what I was there for after I had just received a letter stating what I needed to give to the defendants. I also informed the judge that

30F16

the defendants were going into my phone and had deleted some of my information. Social security wanted me to call Kimberly Hill back, and I asked why I should call her back when she's the Superintendent of the school board. She shouldn't have anything to do with social security. The next day my cell phone was turned off without my permission. I sent the judge paperwork on that too. I felt the Magistrate Judge was being biased and that a hearing should not have taken place at this time. In the first place, protocol stated that plaintiff and defendant both had to agree on a Magistrate Judge. I never agreed on a Magistrate Judge. Why would I have requested Judge Chasanow back if I had agreed to replace her with Magistrate Judge Sullivan? After that he sent me a letter putting me down as a pro se plaintiff. He's the person who put me down as pro se. He denied my multiple requests for an attorney. I then realized I wasn't getting help from anyone. I called around and no attorney or counselor would take my case. Paperwork claimed I broke Local Rule 103.3, but it was not me, it was the defendants. In documentation they claim I broke it. The deficiency was on Keller Transportation. This was on ECF System on 11/28/16. Four summary judgements have been put in by the defendant with no justifiable cause and then the court sent me a notice for me to do a memorandum and declaration for Local Rule 105.3. One summary judgement was in February, one in March, and one in November. I have been fighting four summary judgements and the only one I knew about was with Helen Keller and she put in

that she was sovereign. I put in a memoranda asking for a jurisdiction of a long arm. I never put in a motion for summary judgement, only for their judgement to be amended with attorney generals. Attorney generals are supposed to review this case and I have a witness from the past and the present to testify to the defendant's bad behavior. That was also denied. I was not receiving my mail before they changed the judge. I never got a certification of service from any summary judgements. I called the courts and they told me that it was on jurisdiction. So the defendants and Judge Sullivan told me I could not put any more information in or submit any more evidence because I did not do Local Rule 103 which was not true. Judge Sullivan granted the defendants more time for their interrogation and deposition. The defendants put in a summary judgement on me on the 3rd of March 2017 to teach me a lesson. I asked for them to remove the sanctions, and a summary for the state legislative audit to be added into my complaint. I never heard back from them so I went to the courthouse. I went to the courthouse and looked into their ECF I saw an order for amend and correct. I put the order in. After I did that I started receiving different paperwork with different documents included. Magistrate Judge Sullivan told me that I could put in a motion to resend the order providing granted by April 21, 2017 document 27. When I put in the order, he denied it. He sent me a letter saying I didn't give him good enough reason to put the order back in. He gave the defendants until June 21, 2017 and he

gave me seven days. Once I saw that my documents were being terminated, I put in an order of delegate of authority on April 28, 2017 and I put in for a judicial appeal because I saw that my documents had been removed. I cannot get into the system at home so I have been going to the courthouse. I find it convenient that they moved the courthouse to Richmond, VA which is a place I cannot even drive to. On April 21, 2017 the defendants put in a summary judgement motion deadline when there was never a summary judgement. They were changing the document order and then terminating my case. I saw document 48 for the first time on ~~April~~ March 25, 2017 on the courthouse's ECF System. On the paperwork on document 54-1, another document I never received, document 48 is referenced in my favor but then when I looked into the system, Bradley Snow put in affirms and a certification that I have never received. I don't even know who Bradley Snow is. The defendants are putting in motions and acting like they represent me. How can they represent me when I am the plaintiff and they are the defendants. I was denied council, they claimed I never even worked for them, and they were still trying to move the courts to a board hearing.

I tried to amend and correct my complaint because my first complaint did not contain any details but I gave all of the evidence and they denied that too.

ISSUES

This case arises out of a complaint against the Charles County School Board and

60816

defendants, had all their employees School Bus driver and Attendance complaining about their wages, contributions, healthcare, taxes, and unpaid federal holidays.

This case started from a Class Action lawsuit in Greenbelt, MD in the US District case 8:11-CV-03073-JFM, went to appeals in the Fourth District Court in Virginia and then back to Charles County Circuit Court case No.08-C-15-001526 and is still ongoing now in 2017.

In which the defendants make sure that I was not privileged to be part of it is clearly discriminated against me under 42U.S.C.1983 civil Action of Deprivation of Right and also 18 U.S.C.§241. conspiracy against my rights as citizenship Americans with Disabilities Act of 1990 (ADA) as amended by the ADA Amendments Act of 2008 (Public Law 110-325) 42 U.S.C. §§ 12101-12213, 47 U.S.C. §§ 225 and 611; 29 C.F.R. Part 1602.1 et seq., 1630.1 et seq., 1640.1 and 1641. 1

The Law: Title I of the ADA prohibits employment discrimination against a qualified individual with a disability. The law requires that reasonable accommodations be made to allow the employee to perform the essential functions of the job, or to assist the employee in the application process if necessary. The ADA contains strict confidentiality requirements for medical information related to employee's disabilities. The law also contains requirements for elimination of physical barriers to access. See also the Architectural Barriers Act of 1968, 42

U.S.C. § 4151 et seq., which governs requirements for handicap access to buildings constructed, altered or leased with federal funds. The Uniform Accessibility Standards (UFAS) are found at 41 C.F.R. Part 101-19.6. For modifications to programs and services under Title III of the ADA, see Americans with Disabilities Act of 1990 in the section of this summary on Non-Discrimination with Respect to Students. Race, Religion, National Origin, Gender, and my Disability that the defendants conduct was unlawful to me in the workplace and with housing, children school, banks and more the civil rights laws prohibited conduct under hate crime laws. The defendants intentional select me and my family as their victims, may be it was the ADA or my national Origin or religion I think it was all of the above.

Cause: 28:1331 Federal Question: Other Civil Procedures

I have no idea what's going on with this case or the ECF System and that's why I ask for the courts to be put into appeal.

ISSUE #1

I got the contract through Pettina Scott through public knowledge because of her lawsuit that she is going through. Once she gave me the contract, it had on page 14 where Helen Keller's master contract changes your W-2 to a W-9 and if I were an independent contractor why would you be giving me a W-2 at the end of the year? I never knew I was driving a school bus with schoolchildren on as an uninsured

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I never knew I was driving a school bus with schoolchildren on as an uninsured

9 of 16

driver until I had gotten injured on the job on November 2, 2015. I knew that Keller Transportation had changed my taxes in 2014 because they were supposed to give me a revised copy of my W-2 and never did. Mr. Richard Wesolowski was part of the head of transportation and I showed him the statement I got back from the IRS. It showed me that federal taxes were not being taken out for that month of March 2015. I then found out that no money was being taken out for federal taxes from any employee's check that month. Mr. Wesolowski told me he would take care of this issue but he left at the end of the year. I wanted him to make sure the company fixed this problem so I wouldn't have the problem next year. So instead of doing my taxes in 2016, I went to a tax preparer and he had me down as a W-2 PR and under V resident with Betty Keller of Keller Transportation's phone number-(301) 843-3999-on my personal information. The number was to a Christian school in Washington, DC. It's on all of my, and my son's personal information. I can prove that my taxes were changed by Keller through public knowledge I got from Pettina Scott and pg 14 of Keller's master contract that I received.

ISSUE #2

In 2013, I was refused insurance from the Department of Social Services under Obamacare. That is when I received the demographic report stating that my son Joshua and I were borders and immigrants. I had been calling social services trying

to get this issue taken care of, I called David Ayan the deputy of social services in Baltimore, MD. Mr. Ayan was trying to help me for a while and then he gave me Mr. Slow's number. Mr. Slow told me he would have never found me in the system if I had not been receiving child support payments. He said it was very hard to get in contact with anybody in Charles County because he was in Baltimore. Mr. Slow had Ms. Susan Seifert contact me. Ms. Seifert asked me to send her the demographic report. I had my niece send it. I was not receiving any free lunch. At the time I went to the school board. The transportation department was in the school board and the cafeteria department. I told Ms. Seifert that I went because I was talking to her about my kids not receiving any free lunch. That's when I told her I went to transportation and she got very nasty with me when what I meant was that I went to the cafeteria. Come to find out I recognized her voice and asked her if she was a school teacher. She said no and she got very nasty with me and told me they had nothing to do with it and asked me if I heard her. Then I found out that she was my daughter's principal. But my issue is that I am not a border and a migrant worker. Ernie Keller did an investigation with the Department of Human Resources for Homeland Security during the hiring process and put me in as a border and a migrant worker and I did not find that out until I called Homeland Security. They told me he would have had to have done that during the hiring process. I have proof that he was part of the investigation with Homeland Security.

1B of 16

After September 11, I was told that the Department of Human Resources and your employer have to do an investigation. I still live in the same unit so I can't be a border and a migrant worker. I can prove I still live in the same unit, I've lived here for nine years, and my family have birth certificates and social security cards proving we are United States citizens. I never gave anyone a green card and I don't have one either. I showed my boss the immigration papers and migrant and demographic reports. He closed his eyes and he said "This is not a farm," and walked away. Then I went inside to talk to David Richardson. I asked him if I could see my initial application because I know I put down American citizenship. He told me it was confidential. How could my own information be kept confidential from me? Mr. Richardson wouldn't show it to me. I was enrolled under a group insurance pool FIP which, if you look up immigration puts you in under Charles County School Board's mandatory employee contract as an EB 5 Visa foreign investor. It also monitors everything you do. I have no freedom in my own country. Also, when I first filed this complaint I was told I needed an address to file with the courts. Under Keller Bus Service, when I looked online I found out they were a migrant consultant. Barbara Cook, the secretary, was also listed as a migrant consultant. Then Keller tried to remove the information after I presented the court with evidence. The defendants tried to take down the website and the

12 of 16

website said proxy couldn't take the website down.

ISSUE #3

I live in federal HUD housing under the section 8 program in Charles County, MD and have been living under it since 2005. I have been living in this particular unit since August 16, 2008. My employer has been reporting wages that I did not receive and every year I would have to go to housing and show them my W-2 forms and argue with them that I did not receive the reported wages. I was given a \$500,000 debt to owe to Indian Housing and they gave my then 7 year old daughter a \$500,000 debt. I never had to sign a debt to owe to Indian Housing before until 2013. They tried to make me sign a form that I was a homeowner, which I am not. Every year I would be charged outrageous prices because my employer report giving me money I did not receive. This year when I looked online under Helen Keller runs Indian Housing I found out they are real estate agents and have multiple businesses. In 2011, when I first started working for the defendants I made \$8000. He reported to housing that I made \$68000 and I had to go beg them to change it. Every year I have to beg HUD to change it. In 2016, I had an arm injury and I was out of work and Keller told HUD that I made \$45000. When I called my general manager, David Richardson, I told him to call HUD and tell them I didn't make that much and that I was out due to work-related injury that I

wasn't receiving compensations. He said he would not call and contradict himself. I myself went to HUD and showed them that I had only made \$22000 in 2015 and in 2016 I only made \$4000 because Keller gave me my sick leave three months after I left. I can prove that The Department of Labor and Licensing had a hearing and determined I was justifiable in quitting and with a doctor's note Keller would have to pay me until I found another job. I was told unemployment would only be given if I were able and available. I can prove how much my wages were.

ISSUE #4

Social Security and DIB benefits are coming out my daughter's father is 100% veteran status. I am not able to receive any benefits or any medical benefits because this company was receiving a DIB benefit even when I was working. In October 7, 2015, Keller suspended me because I reported over the radio that he was not paying me for my work that I had done. I went to the social security office and Keller was receiving a DIB benefit, a rental surplus, and children's surplus that was going to New Hampshire. I can prove an account in New Hampshire was receiving Social Security while I was working. I still have no access to this date to find out what he's reporting. I looked under my bank account and there were unnotified deposits being put in and taken from my account. Also I noticed as doing this case he has all six digit routing numbers on all of my checks for the last five years that I've worked for him. Every one of the routing numbers is different.

No one should be receiving any DIB benefits and putting money into accounts under my name illegally. No one should be receiving those benefits other than me. I was still getting unnotified deposits in my account as of March 2017 and I can prove it.

RELIEF REQUESTED

I would like me and my children to be put back in the Department of Homeland Security's system as United States citizens. I would like my housing back the way it was. If anyone owes federal housing it is the defendants for reporting false income to HUD. They need to pay HUD back, not me or my kids. Under social security, my daughter is entitled to her backpay and her benefits. I would like the defendants to make sure they give back social security for her and remove me from social security. I am not a DIB benefit. Any money that belongs to me that my employer has reported, I am entitled to a equitable estoppel. Also, I do not want to be watched like I'm a prisoner.

A MOTION

I would like to ask for a motion for an oral argument because I have dyslexia which the defendants are very aware of because I got my CDL license under the American Disability Act. That is why I am not able to get a lawyer or a counselor for someone to help me. It would be easier to communicate my case if I were granted permission to make my argument oral to the courts.

15 of 16

CONCLUSION

My freedom, my joy of enjoying a place to stay without being threatened to be put out, my children, our peace, and our freedom to remain in the country we are citizens of are being threatened by the defendants. The defendants also claim sovereignty. No man can break the law and get away with it. Here we have the Bill of Rights. See United States v. Keller is proof that from Pennsylvania to California, even in Charles County, MD, these companies have been put to trial for multiple fraud, taxes, and contract fraud offenses. See the State vs Mahoney in Charles County, MD, under the school board, one of the Kellers went to jail for contract fraud and had 613 attorney generals on the case. Also see the United States vs the Board of Education.

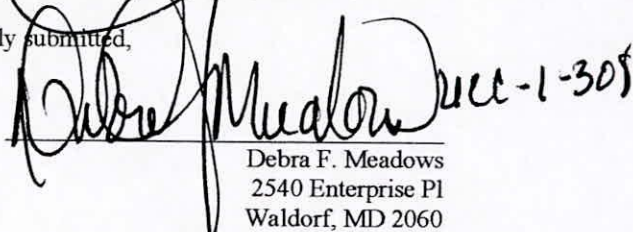
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The plaintiff further requests a motion for the appeals fourth circuit court motion for oral argument and hereby certifies that on this 24 day of May 2017 a copy of the foregoing [name of document] was mailed, first class email, postage prepaid, to [opposing counsel].

Respectfully submitted,

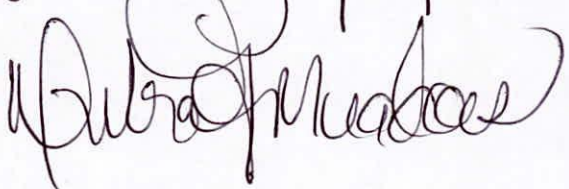

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16 of 16

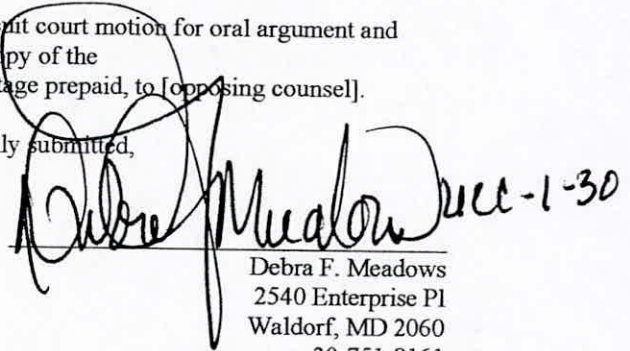
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