

No.

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In the  
Supreme Court of the United States

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Andrew U. D. Straw,  
*Plaintiff,*

Virginia Supreme Court,  
Virginia State Bar,  
*Involuntary FRCP 19(a)(2) Plaintiffs,*

v.

State of Indiana,  
James R. Ahler,  
Indiana Supreme Court,  
State of Vermont,  
Vermont Supreme Court,  
Commonwealth of Virginia Trial Court,  
Seventh Circuit U.S. Court of Appeals,  
U.S. District Court for the Southern District of Indiana,  
U.S. District Court for the Northern District of Indiana,  
U.S. District Court for the Northern District of Illinois,  
U.S. District Court for the Western District of Wisconsin,  
U.S. District Court for the Districts of Maryland & Vermont,  
*Defendants.*

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On Motion to File an **Original Action** Involving Virginia, Vermont, and Indiana

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ORIGINAL JURISDICTION COMPLAINT

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## COMPLAINT

I, *plaintiff* Andrew U. D. Straw, on this 4/22/2020 (Earth Day) for my U.S. Supreme Court Rule 17 Original Jurisdiction Complaint as authorized by 28 U.S.C. § 1251 against the state defendants and federal defendants herein, and with involuntary state plaintiffs alongside me under FRCP Rule 19(a)(2), plus several U.S. Courts (USA federal defendants) state as follows:

### CHART OF PLAINTIFFS AND DEFENDANTS

PLAINTIFFS	REASON FOR INCLUSION	LAW (NOT EXHAUSTIVE)
Andrew U. D. Straw	Injured by Court discrimination and retaliation at the state and federal level, as well as states directly.	Rights violated under 42 U.S.C. §§ 12132, 12133, 12203; 29 C.F.R. § 35.134; Article III, 1 <sup>st</sup> & 5 <sup>th</sup> & 14 <sup>th</sup> Amendments; attacked as a crime victim by courts, causing even more damage
Virginia State Bar	ORDER Disregarded	Full Faith & Credit; 28 U.S.C. § 1738
Virginia Supreme Court	VSB Disregarded	Full Faith & Credit; 28 U.S.C. § 1738
DEFENDANTS		
State of Indiana	Perjury and due process violations	18 U.S.C. § 1621; 18 U.S.C. §§ 2(a) & 3; 18 U.S.C. § 1513; 42 U.S.C. § 12203; Failed to observe 28 U.S. Code § 1738
James R. Ahler	Retaliation and ethical violations	42 U.S.C. § 12132, 12203; 14 <sup>th</sup> Am. Due Process; ABA Model Rule 8.4(g)
Indiana Supreme Court	Discrimination and retaliation against ADA complaints. Due process violations of a most extreme nature.	18 U.S.C. § 1621; 18 U.S.C. §§ 2(a) & 3; 18 U.S.C. § 1513; 42 U.S.C. §§ 12132, 12133, 12203; 29 C.F.R. § 35.134; ABA Model Rule 8.4(g); Failed to observe 28 U.S.

		Code § 1738; 14 <sup>th</sup> Am. Due Process; <b>False Retaliatory &amp; Discriminating Law License Suspension</b>
State of Vermont	Failure to protect	14 <sup>th</sup> Amendment Due Process; ADA Title II; Failed to observe 28 U.S. Code § 1738
Vermont Supreme Court	Failure to provide venue and failure to take jurisdiction / protect	ADA Title II; 14 <sup>th</sup> Amendment Due Process; Failed to observe 28 U.S. Code § 1738
Virginia Trial Court	Failure to take jurisdiction / protect	ADA Title II; 14 <sup>th</sup> Amendment Due Process; Failed to observe 28 U.S. Code § 1738
7 <sup>th</sup> Circuit USCA	Failure to protect & violations of due process & criminal law; false exclusion from using the courts and false punishment in retaliation for ADA cases and defending law licenses	18 U.S.C. § 1621; 18 U.S.C. §§ 2(a) & 3; 18 U.S.C. § 1513; Article III; 1 <sup>st</sup> & 5 <sup>th</sup> Amendments <b>(FALSE AND ILLEGAL COURT BAN)</b> ; Failed to observe 28 U.S. Code § 1738; Failed to enforce 14 <sup>th</sup> Amendment Due Process & ADA Titles II & V, <i>inter alia</i>
INND USDC	False suspension; false exclusion; failure to protect	1 <sup>st</sup> & 5 <sup>th</sup> Amendments; Failed to observe 28 U.S. Code § 1738; Failed to enforce 14 <sup>th</sup> Amendment Due Process; <b>False Reciprocal Law License Suspension</b>
INSD USDC	False suspension; false exclusion; failure to protect	1 <sup>st</sup> & 5 <sup>th</sup> Amendments; Failed to observe 28 U.S. Code § 1738; allowed perjury by Indiana, violating 18 U.S.C. § 1621 & 18 U.S.C. §§ 2(a) & 3;

		Failed to enforce 14 <sup>th</sup> Amendment Due Process; <b>False Reciprocal Law License Suspension</b>
ILND USDC	False suspension; false exclusion; failure to protect	1 <sup>st</sup> & 5 <sup>th</sup> Amendments; Failed to observe 28 U.S. Code § 1738; Failed to enforce 14 <sup>th</sup> Amendment Due Process; <b>False Reciprocal Law License Suspension</b>
WIWD USDC	False suspension; false exclusion; failure to protect	1 <sup>st</sup> & 5 <sup>th</sup> Amendments; Failed to observe 28 U.S. Code § 1738; <b>False Reciprocal Law License Suspension</b>
MD USDC	Refused Venue; refused to protect	1 <sup>st</sup> & 5 <sup>th</sup> Amendments; Failed to observe 28 U.S. Code § 1738
VT USDC	Refused <i>IFP</i> w 11 <sup>th</sup> Am.; refused to protect	1 <sup>st</sup> & 5 <sup>th</sup> Amendments; Failed to observe 28 U.S. Code § 1738
<b>NOTA BENE</b>		
Avvo.com	Lists Indiana discipline on my profile, ruining my reputation	Common law defamation and ADA violations.
11 <sup>th</sup> Circuit USCA	Refused me bar admission based on the Indiana suspension and ignored VSB exoneration	1 <sup>st</sup> & 5 <sup>th</sup> Amendments; Failed to observe 28 U.S. Code § 1738

## FACTS

1. My MOTION to file this Original COMPLAINT explains well the reasons why this COMPLAINT is needed and supports it, so I incorporate all of its allegations here by reference. Indiana's due process failures are delineated step-by-step here and incorporated by reference: <http://dueprocess.andrewstraw.com>
2. I am a disability rights "public figure" according to the Illinois Court of Appeals.<sup>1</sup> The ABA similarly recognized me in 2014 prior to the Indiana attack.
3. However, when I filed several lawsuits to *enforce* federal disability rights, these and my poisoning disability from Camp LeJeune were used against me by the Indiana Supreme Court ADA coordinator for a bogus disciplinary complaint she filed. See, <http://discipline.andrewstraw.com> (includes citations and links to the verified complaint, my answer, and my affidavit). My proposed reform legislation showing how the results could be different is here: <http://reform.andrewstraw.com>
4. My disabilities are the result of other's crime: <http://crime.andrewstraw.com>
5. No state's ADA coordinator has the right to retaliate like that under 42 U.S.C. §§ 12132 & 12133 and the National Federation of the Blind agreed with me on this point. In fact, the later Indiana ADA coordinator, Jennifer Weber, who replaced the one who attacked me, Brenda F. Rodeheffer, told me that no retaliation would be allowed if I made a complaint to the Indiana Supreme Court.

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[https://courts.illinois.gov/R23\\_Orders/AppellateCourt/2015/1stDistrict/1143094\\_R23.pdf](https://courts.illinois.gov/R23_Orders/AppellateCourt/2015/1stDistrict/1143094_R23.pdf)

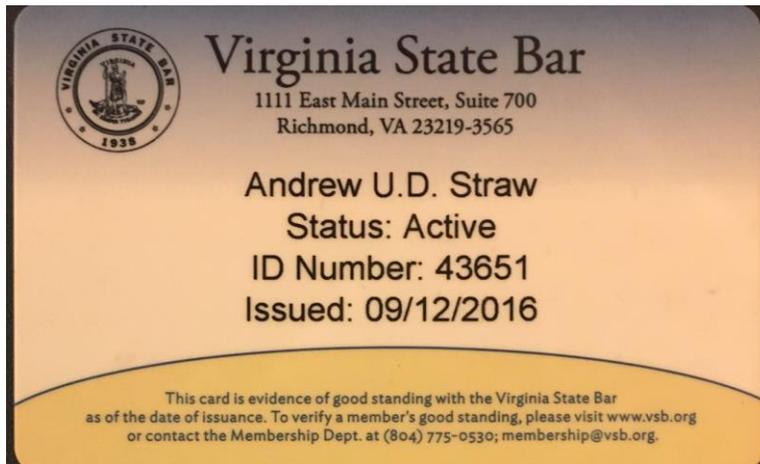
6. The Vermont Supreme Court has an ADA notice on its website that no retaliation is allowed when a person makes an ADA complaint. But in Indiana it was allowed and the damage has now continued for over **5 years**. My 2014 complaint and the retaliation complaint (**9/3/2014**) are in the record of *Straw v. Indiana Supreme Court, et. al.*, 1:16-cv-3483-SEB (S.D. Ind. 2/16/2017) (**Dkts. 1-11 & 1-13**). *See also* **Dkts. 1-14, 1-16, and 1-18**.

7. I was suspended for 180 days in Indiana on 2/14/2017. When the 180 days expired, I filed pleadings for 2.5 years, about 2 dozen total, which pleadings were wholly ignored and no orders issued. Given my 4 U.S. District Courts reciprocally suspended me and one *de facto* disbarred me by banning me from making pleadings in my discipline case (INSD), **I have lost 5 law licenses to the Indiana Supreme Court indefinite suspension**, 2.5 years over the original 180 days this month. <http://discipline.andrewstraw.com> *In Re Andrew U. D. Straw*, 1:17-mc-00013-WTL-TAB (S.D. Ind.). On 2/22/2020, I have suffered **1,104 days of suspension on 5 law licenses**. WIWD and ILND believe they have rescinded my licenses on my request, but the 7<sup>th</sup> Circuit said that I have no right to rescission and that it was “**frivolous**” for me to request it. *Straw v. U.S. District Court*, 18-2192 (7<sup>th</sup> Cir. 2018).

8. I know that this Indiana discipline is bogus because the Virginia State Bar rejected the Indiana discipline both before it happened and after it happened with a 3-judge panel, saying Indiana’s attack, “**had all the grace and charm of a drive-by shooting**” and announced that I met the “**clear and convincing**” evidence standard to

show I deserved no discipline. This is the VSB ORDER (also Exhibit A):  
<https://www.vsb.org/docs/Straw-062217.pdf>

9. The Virginia State Bar executive director, Karen Gould, and I conferred for about an hour in 2016 regarding the Indiana discipline and VSB rejected it, granting me my Virginia license status change from **disabled to active** just 5 months before the Indiana discipline. This is my VSB Card:



10. These multiple VSB ORDERS in 2016 and 2017 rejecting the Indiana process and suspension have Full Faith and Credit effect, but Indiana would not allow it, insisting that the ADA coordinator's attack in retaliation for my own complaint would be supported. *Straw v. Indiana Supreme Court, et. al.*, 1:16-cv-3483-JMS (S.D. Ind. **2/16/2017**). Indiana imposed the suspension with this federal ADA Title II lawsuit open to stop it. *In Re Straw*, 68 N.E.3d 1070 (Ind. **2/14/2017**). *In the Matter of Andrew U. D. Straw*, 17-000-108746 (VSB Disciplinary Board).

11. I have been suspended by the Indiana Supreme Court for **over 3 years** on a 180-day suspension. My case online at <http://mycase.in.gov> shows that my case is

“closed.” My discipline is devoid of orders starting in August 2017 when the 180 days expired.

12. What I did was not even called a crime, but criminally-convicted drunk-driving Indiana judges are routinely given a reprimand only, not suspension. *E.g.* Hon. T. Edward Page.

13. Why was I treated worse than Hon. Page if not discrimination based on disability? This Indiana judge was even driving in the wrong lane into oncoming traffic, putting lives at risk and convicted of a crime, but he only got a reprimand.<sup>2</sup> Ironically enough, that judge with his reprimand then represented a client who became angry at his actions and killed him. Sometimes a just suspension saves a life.<sup>3</sup>

14. In my case, an unjust suspension has ruined a life. Indiana’s consistent discrimination over the past 19 years since my car accident serving that Court has played a part in my poverty and my divorce. It ripped my life apart and I worked for every judge and justice in Indiana. None of the justices currently on the Court can even claim to have worked in such a role before they were appointed to the Court.

15. It is important for this Court to know me and know that I am not incompetent as my former employer says. It is important to see my civil rights work is not

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<sup>2</sup> <https://www.in.gov/judiciary/opinions/pdf/02201701per.pdf>

<sup>3</sup> <https://www.chicagotribune.com/suburbs/post-tribune/ct-ptb-lawyer-page-funeral-st-0826-story.html>

incompetent or frivolous at all. <http://www.andrewstraw.com> *See also:*  
<http://links.andrewstraw.com>

16. Interestingly, the lawyer<sup>4</sup> and the federal judge<sup>5</sup> who violated me personally in one of the cases Indiana used against me also **died in 2018**, both John F. Kloecker, Esq., and Hon. Milton I. Shadur.

17. The verified complaint is on my website about this discipline along with my answer and a long affidavit from me showing disciplining me was wrong and based on animus, not logic. <http://discipline.andrewstraw.com> Given Indiana used only Rule 3.1 against me ostensibly, if I can provide law reforms and amendments to law to conform to my positions, Rule 3.1 cannot be used against me because there is an exception to Rule 3.1 for **law reform work**. Here is my proposed legislation on precisely these topics: <http://reform.andrewstraw.com>

18. I was disabled as the result of crimes. <http://crime.andrewstraw.com> I was poisoned by the U.S. Marine Corps. <http://camplejeune.andrewstraw.com> is incorporated by reference. All links I provide on my website are incorporated here.

19. The attacks on me were additional crimes against a crime victim and civil rights leader.

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<sup>4</sup> <https://www.legacy.com/obituaries/erietimesnews/obituary.aspx?n=john-f-kloecker&pid=190918116&fhid=8578>

<sup>5</sup> <https://www.chicagotribune.com/news/obituaries/ct-met-milton-shadur-obituary-20180116-story.html>

20. I lost **4 additional law licenses** (INSD, INND, ILND, & WIWD) through reciprocal discipline and never had a hearing in federal court. <http://discipline.andrewstraw.com> and <http://reform.andrewstraw.com> discuss these matters and provide citations and I incorporate them by reference.

21. The Indiana hearing was done *in-absentia* over my objections by the hearing officer. Seventh Circuit Chief Judge Diane P. Wood said that *faux* hearing was enough for her. Of course, she said that **AFTER** hiring the Indiana hearing officer and announcing it on the 7<sup>th</sup> Circuit website with my appeal against him still open.<sup>6</sup> *Straw v. U.S. District Court*, 17-2523 (7<sup>th</sup> Cir. 2017); *Straw v. Indiana Supreme Court, et. al.*, 17-1338 (7<sup>th</sup> Cir. 7/6/2017). *Straw v. U.S. District Court, et. al.*, 1:18-cv-278-CMH (E.D. Va.).

22. The Indiana hearing officer, defendant James R. Ahler, was previously a **clerk for at least two 7<sup>th</sup> Circuit judges**, including a former chief judge of the circuit. Then he was a candidate for an Indiana Supreme Court justice vacancy when he began presiding over my disciplinary case. Then he was a candidate for a 7<sup>th</sup> Circuit-appointed federal judge position while sitting on my report for 6 months past the mandatory deadline, while he was my defendant in federal trial court, and while my appellee before the 7<sup>th</sup> Circuit. He was being considered by my federal trial judge for the federal bankruptcy judge vacancy when she dismissed the case against him, and of course she participated in hiring him. *Straw v. Indiana Supreme Court, et. al.*, 1:16-cv-3483-JMS (S.D. Ind. 2/16/2017). So many conflict and ethical violations were

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<sup>6</sup> [http://www.ca7.uscourts.gov/news/positions/2017\\_appt\\_Judge\\_Ahler.pdf](http://www.ca7.uscourts.gov/news/positions/2017_appt_Judge_Ahler.pdf)

condensed into one individual: **Hon. James R. Ahler**. Neither the 7<sup>th</sup> Circuit nor the Indiana Attorney Disciplinary Commission would investigate or punish these obvious violations when I asked.

23. Due process requires a **real hearing** before a **neutral and fair judge**, and this is something Indiana never provided me—not it in its hearing officer and not in its justices, who were retaliating against **my own complaints against them**. *In Re Ruffalo*, 390 U.S. 544 (1968); *In Re Ming*, 469 F.2d 1352 (7<sup>th</sup> Cir. 1972).

24. The U.S. District Court for the Southern District of Indiana acted exactly as hostile and nonsensical as the Indiana Supreme Court itself. For instance, Judge Richard Young stated that the retaliation was not retaliation because I complained about discrimination over the course of 13 years and included employment at the Indiana Supreme Court from 2000 to 2002. **Judge Young was wrong** because the ADA coordinator attacked my **PRESENT** disability, my **PRESENT** complaint, and my **PRESENT** federal lawsuits. *Straw v. Indiana Supreme Court, et. al.*, 1:15-cv-1015-RLY (S.D. Ind. 2016). If Young had done his job, much litigation and many appeals would have not been needed. This original action would not be needed if Hon. Richard L. Young had stopped the **discrimination and the discipline**. Instead, he played around, arguing that a dismissal for inadequate service was **with prejudice** and this allowed the 7<sup>th</sup> Circuit to impose *res judicata* for Ahler even when Ahler was not a defendant in Hon. Young's case. *Straw v. Indiana Supreme Court, et. al.*, 17-1338 (7<sup>th</sup> Cir. 7/6/2017). Due process allows none of this judicial abuse nonsense.

25. No federal court has ever evaluated the 2/14/2017 Indiana discipline for ADA violations or due process violations since the **actual discipline** was imposed.

26. These dishonest judicial games have ruined me, caused me to have such distress that my chest often hurts and my mental illness from Camp LeJeune poisoning was exacerbated. *Straw v. Wilkie*, 18-7129 (U.S. CAVC); *Straw v. North Carolina*, 7:18-cv-74-M (E.D. N.C.); *Straw v. USA*, 16-17573-GG (11<sup>th</sup> Cir.); *In Re Camp LeJeune Toxic Water Contamination*, 1:11-MDL-2218 (N.D. Ga. 12/5/2016).

27. The federal government just cannot stop discriminating against me or violating my First Amendment petitioning rights, presuming apparently that now that I am thoroughly injured by dishonest courts, **no other court** will ever give me justice. *Straw v. U.S. Department of State*, 1:19-cv-02294 (D.MD); *Straw v United States*, 3:19-cv-02531 (D.S.C.). It is a valid assumption after all of the injustice I have suffered, and it justifies my asylum application in the Philippines.

28. I also filed an ethical complaint appeal (JCD) about Diane P. Wood in Washington for her ethical violations. Her response to my complaints was to dishonestly deny them, judging herself like the Indiana Supreme Court judged itself, allowing that illegal hiring to stand, and she put a bond requirement **on me** making any further ethical complaints, which is **retaliation** protecting her own **dishonesty**.

29. She did not act like a neutral judge, ever, any time I have ever interacted with her. She was on the panel that banned me. *Straw v. Indiana*, 18-2878 (7<sup>th</sup> Cir. 2018)

30. And when I asked the U.S. Supreme Court to do something about it, it used its certiorari discretion and would not intervene.<sup>7</sup> I have been denied certiorari 12 times, mostly for cases concerning this discipline or related cases.

31. I am trying to address the matter of the blatant and well-established Midwest due process violations by the United States in Virginia. *Straw v. U.S. District Court, et. al.*, 1:18-cv-278-CMH (E.D. Va.) (Dkt. 7 & 20).

32. The federal trial judge and the 7<sup>th</sup> Circuit were in the process of **hiring my Indiana hearing officer to be a federal bankruptcy judge** when I was suing that hearing officer.<sup>8</sup> When my case was dismissed at the trial level, the trial judge violated my 5<sup>th</sup> Amendment right to due process and my 1<sup>st</sup> Amendment right to use the courts without interference and dishonesty. I had never sued Ahler before, so what were my trial judge and the 7<sup>th</sup> Circuit doing using *res judicata* to defend him while simultaneously hiring him as a federal judge?

33. There is no excuse for it.

34. No judge and no court have any business **hiring my defendant** during my lawsuit.

35. The 7<sup>th</sup> Circuit continued with the same due process violations, **hiring the appellee hearing officer**, with him starting work on June 15, 2017, three weeks before my appeal was denied solely on *res judicata* grounds, so ironic because the entire

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<sup>7</sup> [https://www.supremecourt.gov/DocketPDF/17/17-7499/42922/20180410140826934\\_00000001.pdf](https://www.supremecourt.gov/DocketPDF/17/17-7499/42922/20180410140826934_00000001.pdf)

<sup>8</sup> <https://www.innb.uscourts.gov/content/james-r-ahler>

discipline was **retaliation** for my **petition for redress of disability discrimination grievances**. June 15, 1215, is the date the Magna Carta was signed and this right came into being.

36. Less than one month later after his hiring as a federal judge, the hearing officer was rewarded by my appeal being denied under *res judicata* even though I never in my life sued that hearing officer before and the Indiana discipline was never adjudicated under the ADA as it needed to be under those circumstances. *Straw v. Indiana Supreme Court, et. al.*, 17-1338 (7<sup>th</sup> Cir. **7/6/2017**) (One panel member voted against me and then **recused** because Ahler was his clerk).

37. My discipline was and is an **ADA Title II violation and violates due process**. Because I tried to get the Indiana Supreme Court Clerk to file my petition and he would not, this also violates the First Amendment and the **open courts** provision of the Indiana Bill of Rights: Section 12. *California Motor Transport Co. v. Trucking Unlimited*, 404 U.S. 508, 510, 92 S.Ct. 609, 611, 30 L.Ed.2d 642 (1972); *McDonald v. Smith*, 472 U.S. 479, 486 (1985). Petitions are sacrosanct in our system of law and retaliation is not allowed even though the 7<sup>th</sup> Circuit, 4 U.S. District Courts, and the Indiana Supreme Court all retaliated.

38. As I mention and explain in my motion to allow this proceeding, neither the state and federal courts in the Midwest, a Virginia trial court, nor the Vermont state courts would provide me with an honest and open forum. The U.S. District Court for the District of Maryland has done the same, rejecting my lawsuit based on venue.

39. At least 3 states and more U.S. entities being in the caption (both plaintiff and defendant), **this is an original jurisdiction matter.** 28 U.S.C. § 1251.

40. I am asking for the Indiana **banning rule** I cite below to be found to violate the ADA Title II because it specifically and deliberately violates the right of people with disabilities to practice law. *Ex Parte Garland*, 71 U.S. 333, 379 (1867) (One does *not* hold a law license merely “**as a matter of grace and favor.**”); *Supreme Court of N.H. v. Piper*, 470 U.S. 274, 281 (1985) (“The opportunity to practice law is a ‘**fundamental right**’ which falls within the ambit of the **Privileges and Immunities Clause.**”).

41. So, this is a right protected by the Constitution as a fundamental right and the ADA and the Indiana rule does not even say that the attorney with disabilities is unable to practice. It just bans all disabled people from being lawyers.

42. With *Tennessee v. Lane*, 541 U.S. 509 (2004), laying the groundwork, now it is time to declare the violations and grant me damages and other relief against all of the defendants.

43. Even the 7<sup>th</sup> Circuit has precedent in this area implementing a U.S. Supreme Court precedent, allowing a state court loser to attack the state statute that caused the person to lose. In this case the statute is a state supreme court rule emanating from powers granted by the Indiana Constitution, just like the legislature is granted powers to make state legislation.

44. All are covered by the **Supremacy Clause** of the U.S. Constitution.

45. *Sykes v. Cook Cnty. Circuit Court Probate Div.*, 837 F.3d 736, 742 (7th Cir. 2016):

So, for example, a state court loser is not barred from **targeting a statute** which has been construed against her in a state court decision, so long as she does not seek to overturn the state court judgment itself. *Skinner v. Switzer*, 562 U.S. 521, 532-33, 131 S.Ct. 1289, 179 L.Ed.2d 233 (2011)

46. I tried again to address this Indiana catastrophe in 2017, but the case was dismissed by **allowing perjury** to get more time. Indiana committed perjury by stating that **29 days** after service of my complaint was the deadline. FRCP Rule 12 has no such 29-day deadline, as this Court will know.

47. The only reason I lost is because the court was dishonest and the 7<sup>th</sup> Circuit was dishonest, AGAIN. And when I fulfilled my obligation to report that perjury, **18 U.S.C. § 4**, my First and Fifth Amendment rights to use the courts was stripped. *Straw v. Indiana*, 18-2878 (7<sup>th</sup> Cir. 2018). See the motion to allow this proceeding, which also describes the other federal crimes inherent in protecting perjury and causing financial and other injury to me as a crime victim and witness. I have been a crime victim from the acts of other U.S. government officers for 50+ years. <http://crime.andrewstraw.com> This is just more of the same, unrepentant.

48. I have no rights now. Someone can sue me in the 7<sup>th</sup> Circuit and I cannot even respond because the 7<sup>th</sup> Circuit said I have no right to file anything of a civil law nature with any federal clerk of court in the 7<sup>th</sup> Circuit. Some criminal reckless driver could hit me **again** and I would not be able to use the 7<sup>th</sup> Circuit federal courts to get relief. This violates U.S. Supreme Court precedent, again:

In *Bill Johnson's Restaurants, Inc., Petitioner v. National Labor Relations Board*, 461 U.S. 731 (1983), the U.S. Supreme Court said:

In *California Motor Transport Co. v. Trucking Unlimited*, 404 U.S. 508, 510, 92 S.Ct. 609, 611, 30 L.Ed.2d 642 (1972), we recognized that the

**right of access to the courts** is an aspect of the **First Amendment right to petition** the Government for redress of grievances.

49. Moreover, using the petitioning right is one of the **most precious** of civil rights in the Bill of Rights. *McDonald v. Smith*, 472 U.S. 479, 486 (1985).

50. By citing to *In Re Wick*, 628 F.3d 379 (7<sup>th</sup> Cir. 2010), against me as the 7<sup>th</sup> Circuit has done, the 7<sup>th</sup> Circuit created a ghost rap sheet that I would have to overcome if ever falsely accused of a crime. The litany of bad faith decisions appears to follow me everywhere and this is why only one court can address this: the **U.S. Supreme Court**.

51. But the 7<sup>th</sup> Circuit does not believe I have rights. I know this because one of my 2 panel members, Hon. Richard Posner, said shortly after denying me that he ignores the law, ignores the Constitution, and *deliberately evades enforcing U.S. Supreme Court precedents*.

52. It is very important to see the arrogant and tyrannical attitude of a federal judge who believes he is bound by no law and his only role is to pick winners and make lackadaisical excuses. Hon. Posner's attitude<sup>9</sup> is the attitude of all the 7<sup>th</sup> Circuit judges and this is apparent in their ORDERS. <http://ca7.andrewstraw.com>

53. This "a judge can do no wrong" is the definition of **arbitrary and capricious** and leads directly to the abuses I have suffered, from the false accusations of "frivolous"

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<sup>9</sup> Adam Liptak, "An Exit Interview with Judicial Provocateur Richard Posner," 9/11/2017, *NYT*, <https://www.nytimes.com/2017/09/11/us/politics/judge-richard-posner-retirement.html>

to the refusal to enforce laws and the Constitution and Bill of Rights so that I am deprived of justice.

54. That bad faith attitude by federal judges deserves to be ridiculed and rejected by every honest federal judge in the United States. I did not get relief because Hon. Posner favored that hearing officer *whom he had just hired* and he favored the Indiana Supreme Court that employed Ahler, with 5 Republican justices who act with hubris and tyranny and political favoritism. This Court rejected their anti-civil rights attitude in *Timbs v. Indiana*, 586 U.S. \_\_\_\_ (2019), a 9-0 stomping of a 5-0 Indiana Supreme Court decision on the 8<sup>th</sup> Amendment.

55. Hon. Posner respects no law or civil rights **so he can choose winners** without the inconvenient restrictions of *law*:

He called his approach to judging pragmatic. His critics called it **lawless**. “I pay very little attention to legal rules, statutes, constitutional provisions,” Judge Posner said. “A case is just a dispute. The first thing you do is ask yourself — **forget about the law** — what is a sensible resolution of this dispute?”

The next thing, he said, was to see if a recent Supreme Court precedent or some other legal obstacle stood in the way of ruling in favor of that sensible resolution. “And the answer is that’s actually rarely the case,” he said. “When you have a Supreme Court case or something similar, they’re often **extremely easy to get around.**”

<https://www.nytimes.com/2017/09/11/us/politics/judge-richard-posner-retirement.html>

56. I sued the Indiana Supreme Court and its ADA coordinator and hearing officer, *inter alia*. I found the federal judges to be no better, no more honest or willing to uphold law or the Constitution than Indiana was.

57. Indiana said its discipline was based on Rule 3.1, but there are *no precedents* of anyone ever being suspended with that rule for civil rights lawsuits in which the only thing to happen was a federal judge *wrongly and cavalierly* using the word frivolous **without any sanction at all**. Certainly no precedent of a 3-year suspension on that basis.

58. In fact, the Virginia State Bar in 100% rejecting what Indiana did cited to a Virginia case on **attorney discipline and Rule 3.1**. VSB said:

Furthermore, in *Moseley*, Mr. Moseley was sanctioned by the trial court for filing frivolous pleadings; however, a three-judge panel of the disciplinary board dismissed a disciplinary charge relating to Rule 3.1 as it found **no clear and convincing evidence that the claims were totally frivolous**. *Virginia State Bar v. Moseley*, In the Circuit Court of Loudoun County, CL 52390 (July 28, 2009) (appealed on other grounds).

59. The term “totally frivolous” is not raised or considered by the Indiana Supreme Court. Its use of a **conflicted single hearing officer** (James R. Ahler) instead of a panel of 3 neutral judges as the VSB used both for me and Mr. Mosely shows the fragile and excessive nature of the process in Indiana. *In Re Straw*, 68 N.E.3d 1070 (Ind. 2/14/2017); *In Re Straw*, 98S00-1601-DI-12 (Ind. 2017); *In the Matter of Andrew U. D. Straw*, 17-000-108746 (VSB Disciplinary Board Dismissal, 6/20/2017).

60. Just 5 days before my VSB exoneration, my Indiana hearing officer, James R. Ahler, started working for the 7<sup>th</sup> Circuit as a federal judge with a 14-year term. It is worth noting when he is made a millionaire by the federal government that **poisoned me and refused me justice**, driving me into poverty on SSDI and making me swallow decades of discrimination without relief, humiliating me so severely.

61. Rule 3.1 was in fact NOT the reason for disciplining me because that rule provides in its comments for someone **seeking law reform**, as I was.

<http://reform.andrewstraw.com>

62. I was in fact suspended because of **Indiana Admission and Discipline Rule 23, Section 3(b)**.

63. The ADA coordinator attacked my disability from being poisoned by the U.S. Marine Corps and caused me injury all around the country.

<http://camplejeune.andrewstraw.com/> This focus on my disability made Section 3(b)

and its indefinite suspension **mandatory**. So that rule applies and **Rule 3.1 does not**.

This reality in the rules shows why I was suspended for 3 years on a 180-day suspension and there is no prospect of anything changing because my oppressor is completely in charge of me like a jailor or prison warden. I have been **“in the hole”** for 3 years.

64. With no action by the U.S. Supreme Court, I will die before this injustice ends. This is an embarrassment for me, my family, and my thousands of Disability Party supporters who watch in agony as I struggle with this.

65. It is very important for this Court to see the text of this Rule 23 and its Section 3(b):

**RULE 23, Indiana Rules of Adm & Discipline**

**Section 3. Types of Discipline and Suspension; Notice of Orders and Opinions (b) Disability suspension. Any attorney found disabled by reason of physical or mental illness or infirmity or by use of or addiction to any intoxicants shall be suspended indefinitely for the duration of the disability.**

66. This provision was created under authority of the Indiana Constitution, which gives power to create such rules to the Indiana Supreme Court. Indiana Constitution, Article 7.

67. Given my physical disabilities from public service working for the Indiana Supreme Court and my disabilities from being born on a U.S. Marine Corps base that is an EPA Superfund site, there should be **respect** for my disability rights work. I know more about disability than the judges who denied me. I know more about discrimination because courts discriminated against me for 19 years and denied my fundamental rights under the ADA and the U.S. Bill of Rights.

68. <http://disability.andrewstraw.com/>

69. <http://camplejeune.andrewstraw.com/>

70. <http://crime.andrewstraw.com>

71. <http://links.andrewstraw.com>

72. These URLs on my website show the massive damage to me all across the United States flowing from Indiana discrimination that started 19 years ago and has not stopped.

73. I believe my CV shows on its face that I am not incompetent as the Indiana Supreme Court has said. I ask this Court to read it. [www.andrewstraw.com](http://www.andrewstraw.com)

74. I have standing and have been injured by the Indiana Supreme Court's rule and all the other crimes. I need this Court to look at the language of that Indiana Supreme Court rule above and declare it to violate the ADA, Title II. The Court should also declare that it was this Section 3(b) rule applied to me, and no other.

75. State courts discriminate and have done so throughout American history and are covered by Title II of the ADA. The U.S. Supreme Court has held as much. *Tennessee v. Lane*, 541 U.S. 509 (2004).

76. Even the U.S. Supreme Court has generated sad precedents that discriminate badly based on disability and violate the most basic of human rights. *Buck v. Bell*, 274 U.S. 200 (1927); *Stump v. Sparkman*, 435 U.S. 349 (1978).

77. Just like *Bowers v. Hardwick*, 478 U.S. 186 (1986), was never good law and that case was replaced as constitutional law by *Lawrence v. Texas*, 539 U.S. 558 (2003), and *Obergefell v. Hodges*, 576 U.S. \_\_\_ (2015), people with disabilities need *Buck* and *Stump* to be wiped from good precedent.

78. I should be allowed to sue Ahler as a judge for his attacks on my disability rights and get damages from the State of Indiana.

79. People with disabilities have rights under the ADA Title II and the U.S. Supreme Court stated that the ADA Title II is valid 14<sup>th</sup> Amendment Section 5 legislation. *Tennessee v. Lane*. Indiana, Vermont, and Virginia have flouted the ADA Title II & V with regard to me by invoking venue and jurisdiction as reasons to deny me a fair forum.

80. In Lake County, Indiana was late with its answer and received 30 days more time without asking for more time (NO motion was made) and without there being any ORDER granting more time, no court discretion exercised. This is the bizarre universe of Indiana courts. *Straw v. Indiana*, 45D10-1711-PL-00113 (Lake Co. Sup. Ct. 2018).

81. The Virginia State Bar, a Virginia Supreme Court agency, has stood up for my rights and I do deeply appreciate that. It is also important that the U.S. Supreme Court has graciously allowed large groups of disabled lawyers to join the bar with the Chief Justice of the United States using ASL for the deaf lawyers.

82. Indiana does NOT do this because **Indiana bans disabled attorneys**.

83. This stark reality and difference in attitude is important when Harvard Law School revealed about 60% of its law students experience mental illness.<sup>10</sup> It is not enough that the U.S. Supreme Court would welcome those students to the bar when one state, Indiana, can thumb its nose at everyone who has a mental disability like I do. Like those Harvard students do. Just look at the complaint against me. The first grounds was my mental disability. *See, Straw v. Indiana Supreme Court, et. al.*, 1:16-cv-3483-SEB (S.D. Ind. 2/16/2017) (**Dkt. 1-11, 1-13**)

84. Note that the immunity federal judges have comes at the expense of the bodily integrity of a disabled woman, sterilized due to the actions of an Indiana trial judge. *Stump v. Sparkman*, 435 U.S. 349 (1978). Indiana gave us that abomination after decades of official eugenics and the first **Eugenics Law** on Earth passed in 1907. No judge should be immune when they deliberately hurt people, sterilize them, or we have a judicial branch equivalent to that of Nazi Germany, which also used the German courts to sterilize disabled people like unwanted animals. *Buck v. Bell* and *Stump v. Sparkman* are Nazi-style law and should be rejected now.

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<sup>10</sup> <https://www.law.com/2019/12/30/new-report-shows-depression-and-anxiety-are-prevalent-at-harvard-law/?slreturn=20200025105132>

## DISABILITIES

85. I have severe physical and mental disabilities from public service. I hereby incorporate by reference the following documents from *Straw v. Village of Streamwood, et. al.*, 3:16-cv-50387 (N.D. Ill.): my affidavit regarding disabilities, Exhibit 4 in that case, and all evidence thereof mentioned in that affidavit, Exhibits 5-10. The x-rays of my broken legs and pelvis are easily seen on the webpage I set up to display my disabilities, incorporated here by reference: <http://disability.andrewstraw.com>

86. I have been adjudicated as disabled by Illinois Court of Appeals, which recognized that I am a disability rights public figure. *Straw v. Chamber*, 2015 IL App (1st) 143094-U (at \*2).<sup>11</sup> The Department of Justice admits that those like me with SSDI benefits were administratively adjudicated as being disabled:

"All recipients of SSDI have been determined to have a disability within the meaning of 42 U.S.C. § 423(d)(1) by the Social Security Administration." *USA v. Evolve Bank & Trust*, 2:16-v-02040 (W.D. Tenn.) (Dkt. 1)

87. Further, the U.S. Department of Education forgave my \$52,000 student loan due to my being on SSDI with severe disabilities. This disability forgiveness was finalized on or about September of 2017.

88. My disabilities are severe but can be accommodated. The problem is that discrimination is worse than the disability itself and I am crippled not by mental or

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<sup>11</sup>

<https://courts.illinois.gov/R23 Orders/AppellateCourt/2015/1stDistrict/1143094 R23 .pdf>

physical disabilities, but the actions of others who want to see me fail. This is no different from the legal regime sustaining slavery. It is not a necessary condition for a black person to be a slave but law made it so. Laws perpetuate discrimination and judges even more so with their warped discretion.

89. The United Nations considers divorce to be a human right and especially for a woman, but disability is also considered a “**civil death.**” This position for women is ancient in English law:

The seventeenth-century English historian William Blackstone described women’s loss of full legal personality on marriage as a form of “**civil death**”. The main aim of reform ever since has been to restore to women all the indicia of legal personhood on genuinely equal terms with men – to change their status from object to subject. **Much the same can be said of people with disabilities except that civil death in their case has occurred either at birth or at the moment of disablement later in life.**

<https://www.ohchr.org/Documents/Publications/HRDisabilityen.pdf>

90. I am a **disability rights political figure** because I founded “Disability Party” on 2/5/2013 and it now has thousands of followers in the U.S.A. and abroad. I am a disability rights lawyer and impact legislation advocate. This made me some enemies in the Midwest. The sheer hostility can be seen as the 7<sup>th</sup> Circuit denies me the ability to keep sidewalks and curb cuts clear of snow in the Midwest. *Straw v. Streamwood, et. al.*, 17-1867 (7<sup>th</sup> Cir. 2018). I filed this lawsuit on the same day I filed the lawsuit to stop the Indiana discipline: **Christmas Day, 2016.**

91. The ADA Amendments Act of 2008 guarantees that mitigating or ameliorating treatments should be disregarded when considering the disability. 42 USC §12102(4)(E)(i).

92. The broken state of my right hip and right femur and left leg and ankle show that I would be in a wheelchair all the time without that metal keeping me together. I am even missing a large portion of the top of my right femur from the 2012 total hip replacement, which includes a prosthetic partial femur. I must be considered as a person who uses a wheelchair because I could be in that state with a single trip and fall, I have used a wheelchair in the past, and the ADA says I am in that “wheelchair-using state” forever **as a matter of law**. 42 USC §12102(4)(E)(i).

93. I have sued the City of South Bend and its Mayor Pete Buttigieg in Indiana and sought the assistance of the Federal Highway Administration’s Office of Civil Rights in 2015. *Straw v. City of South Bend, et. al.*, 3:16-cv-342-JED-MGG (N.D. Ind.). FHWA Civil Rights Office in Washington assisted me.

94. FHWA said that blocking accessible features with snow is prohibited under the ADA, Title II. (**Exhibit 16**, *Straw v. Streamwood*). I settled with South Bend years ago. Similarly, I settled with Kane County, Illinois, on or about March 2017 due to that local government leaving a large pile of snow in 50% of its handicap parking serving the Election Board office when I was a congressional candidate there. I acted as a Title II tester under the ADA. See, *Tandy v. City of Wichita*, 380 F.3d 1277 (10<sup>th</sup> Cir. 2004)

95. These settlements are evidence that my ADA work is yielding some scattered positive results for people with disabilities. I have also set an Illinois human rights precedent that businesses deliberately piling snow into handicap parking is discrimination on its face. *Straw v. Reposteria*, 2015CP3451 (Ill. Hum. Rts. Comm.

2018). I had standing to do this because of my physical disabilities obtained from my sacrifice to 400+ Indiana courts.

96. I also fought to force Illinois to provide me with accommodations in my run for Congress in 2015-2016. The failure to do so is now the subject of an appeal. *Straw v. Illinois State Board of Elections*, 1-19-1783 (Ill. Ct. App. Dist. 1).

97. The Indiana Supreme Court has discriminated against me for the past **19 years** for the reasons I gave in *Straw v. Indiana Supreme Court, et. al.*, 1:16-cv-3483-SEB-TAB (S.D. Ind.). See also *Andrew U. D. Straw v. State of Indiana, by Gov. Eric Holcomb*, 49D10-1907-PL-030392 (Marion County Superior Court #10).

98. I am very sensitive and absolutely intolerant to disability discrimination and denial of my rights to accommodations and this increases the level of damages that are due here. I come as a package, an eggshell skull plaintiff. <http://crime.andrewstraw.com> and <http://camplejeune.andrewstraw.com> and <http://disability.andrewstraw.com> and <http://reform.andrewstraw.com>

#### COUNT I: ADA TITLE II VIOLATIONS, *INTER ALIA*

99. On its face, the Indiana Supreme Court Rule 23, Section 3(b) cited above bans all people with disabilities from having an Indiana law license as a mandatory matter and does not include any provision about whether a lawyer with disabilities can practice or not, but instead it **presumes** that all disabled people are incompetent implicitly and cannot practice law, comparing us to people with substance abuse problems. This provision and the discipline retaliating against my ADA complaint in 2014 discriminate and **violate Title II of the ADA**. This simply proves that the

*Tennessee v. Lane* discussion of state court discrimination being pervasive is true. Compensatory damages are available under *Barnes v. Gorman*, 536 U.S. 181 (2002) and 42 U.S.C. § 12133. Punitive damages also due for the violations of the Bill of Rights (1<sup>st</sup> & 5<sup>th</sup> Amendments) under *Bivens v. Six Unknown Agents*, 403 U.S. 388 (1971) and *Bell v. Hood*, 327 U.S. 678 (1946). Just a few months before the ADA coordinator attacked me in retaliation for my own ADA complaint, I was recognized by the ABA as a “spotlight” attorney with disabilities<sup>12</sup> and every single person on that page is violated by that Indiana disability banning rule. The ABA noted my intention to study the rules and change them but before I could do that, I was under intense fire from the Indiana Supreme Court.

100. ABA said:

When asked about the inclusion of lawyers with disabilities in the legal profession, Andrew says we have a very long way to go. Attitudinal barriers are the most difficult to overcome. He is currently evaluating the relationship between **disability, admission, and discipline rules of all state supreme courts.**

101. Clearly, the Indiana Supreme Court did not want me to be doing that, so it engaged me with all its force for disruption for 5+ years after I complained about its discrimination against me.

102. The first deaf-blind attorney who ever graduated from Harvard Law School, Haben Girma,<sup>13</sup> also is on that ABA list with me and she just published a book. Her

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<sup>12</sup>

[https://www.americanbar.org/groups/diversity/disabilityrights/initiatives\\_awards/spotlights/](https://www.americanbar.org/groups/diversity/disabilityrights/initiatives_awards/spotlights/)

<sup>13</sup>

[https://www.americanbar.org/groups/diversity/disabilityrights/initiatives\\_awards/spotlight/girma\\_h/](https://www.americanbar.org/groups/diversity/disabilityrights/initiatives_awards/spotlight/girma_h/)

story is compelling and she should NEVER have to face discrimination like what Indiana dumped on me with that rule after *I sacrificed for them as an employee* so severely with broken legs and pelvis. <http://disability.andrewstraw.com/>

103. The Indiana justices should be walking on eggshells instead of damaging me after the amount of crime I have had to suffer as a disabled person from public service. <http://crime.andrewstraw.com>

104. Harvard Law School was featured in national news media in 2019 because its students have a mental illness rate of about 60%. Indiana would therefore ban 60% of the lawyers graduating from Harvard Law School when they are “outed.”

105. The facts here involve a conspiracy to deny disability rights and constitutional rights and engaging in criminal actions contrary to federal law involving at least 3 different states’ courts (VT, IN, VA) and seven federal courts (CA7, CA11, INSD, INND, ILND, WIWD, D.MD). It is truly unfortunate that the U.S. District Court for Maryland acted just like all the courts that would not take jurisdiction and complained about venue. *Straw v. Indiana*, 1:19-cv-03034-SAG (D.MD)

106. The 11<sup>th</sup> Circuit denied me bar membership by relying on what Indiana did to me, and the 11<sup>th</sup> Circuit ignored and rejected the VSB’s exoneration ORDER. This is more evidence that the conspiracy to deny my rights and hurt me as a crime victim crosses circuit lines. *Straw v. USA*, 16-17573-GG (11<sup>th</sup> Cir. 5/22/2019)

107. However, the 4<sup>th</sup> Circuit has not disciplined me or even felt the need to hold any process or hearing, presumably relying on the VSB ORDER. The 4<sup>th</sup> Circuit is the highest level court where I am admitted to practice law.

108. Virginia State Bar protected me and this makes Virginia a plaintiff. It is in the interest of the VSB to protect and maintain the full effect of that **6/20/2017 ORDER**. This is also true of the Virginia Supreme Court. Under FRCP Rule 19, VSB and the Virginia Supreme Court properly must appear as involuntary but necessary plaintiffs.

109. Vermont sided with Indiana and would not provide me with a forum. *Straw v. Indiana, et. al.*, 19-147 (Vt. 10/4/2019). This makes Vermont a defendant especially because Vermont states on its own supreme court website that it does not tolerate retaliation for ADA complaints: “Any **intimidation, retaliation** or **interference** for filing a complaint or assisting in an investigation is prohibited, will not be tolerated, and will result in a sanction similar to those imposed for discrimination against persons with disabilities.”<sup>14</sup>

110. Vermont clearly **knows better** than to let another state retaliate in exactly that fashion and then collude with federal courts to violate the ADA and commit crimes against a civil rights leader. ADA & Due Process violations are present here because I provided ample evidence that I have **no forum** where the damage happened. *Straw v. Vermont*, 2:19-cv-00221-CR (D.VT) (DISMISSED per 28 U.S.C. § 1915(e)(2)(B)(iii)).

111. Given the unanimous choices to deny me a forum, I received the same result in federal court in Vermont.

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<sup>14</sup> <https://www.vermontjudiciary.org/ada-info/policy-and-procedures-regarding-persons-disabilities>

112. All of the pending cases should be consolidated in this original action. All of the wrong decisions should be reopened and set right by this original action. *See*, <http://ca7.andrewstraw.com>

113. The Virginia trial court also would not provide me with a forum, violating the ADA and due process because I provided ample evidence that I have **no forum** where the damage happened. *Straw v. Indiana*, CM18-958 (Pr. Wm. Co. Cir. Ct. 2018). Virginia is therefore both a plaintiff and a defendant based on its contradictory actions.

114. The state defendants violated me under the ADA, Title II, the Rehabilitation Act, and the 14<sup>th</sup> Amendment. The federal defendants violated me as a due process matter under the 5<sup>th</sup> Amendment and Article III of the U.S. Constitution, both of which require **fair courts and open courts**, denied to me so roundly and in criminal collusion with the state courts. Amazingly, some of these courts would go so far to deny that they ended up protecting perjury and punishing the one who reported it. These are crimes and I am the victim, yet again. The failure to provide a forum and banning me from using federal courts represents 1<sup>st</sup> Amendment petition violations. *See, supra*.

115. The criminal violations involved with the perjury by Indiana and the protection of that perjury and attacks on me as a witness and my report all indicate due process violations by the courts that did it. The rampant ethical and conflict problems I describe also indicate due process violations that must be compensated and addressed so these problem end now. I want restitution.

116. The damages I claim for this completely unacceptable racket of discrimination and due process violations and the closing of the courts to me, *inter alia*, is my birthday converted to billions of dollars: **\$3,191,969,000**.

## COUNT II: DECLARATION OF LAW

117. This Court is requested to declare that the Indiana Supreme Court Rule (Ind. R. Adm. & Disc., R. 23, Sections 3(b)) violates Title II of the ADA and 14<sup>th</sup> Amendment due process. 42 U.S.C. §§ 12132 & 12133. It violates a **fundamental right** to a law license, also **privileges and immunities**. *Supreme Court of N.H. v. Piper*, 470 U.S. 274, 281 (1985) (“The opportunity to practice law is a ‘**fundamental right**’ which falls within the ambit of the **Privileges and Immunities Clause**.”).

118. The implementation of that Indiana rule led to a flood of legal and constitutional and ethical violations that all also violate 5<sup>th</sup> and 14<sup>th</sup> Amendment due process and the 7<sup>th</sup> Circuit has committed crimes related to the perjury done by the Indiana Supreme Court and its groper attorney general.<sup>15</sup> This also needs to be declared. The failure to protect basic disability rights is another violation of due process and the false allegations of frivolous only add due process damage and show the **bad faith of federal judges**. This is an enormous mess that cannot be swept under the rug. This Court must be very loud and very direct in rejecting the attitudes and behaviors of the lower courts, state and federal. The Court should also declare that it is manifest that I was disciplined based on *this Indiana banning rule* and *not Rule*

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<sup>15</sup> <https://www.indystar.com/story/news/politics/2019/12/17/disciplinary-commission-suspend-curtis-hills-law-license-2-years/2678346001/>

**3.1.** VSB explained this by rejecting discipline unless the action was “totally frivolous.” *Moseley*. Alternatively, I should be **treated as a tester** who is protecting both my rights and those of every other disabled person currently banned from practicing law in Indiana for no reason but **prejudice and categorical exclusion** in violation of the ADA Title II.

119. The Supremacy Clause of the U.S. Constitution supports such a declaration to implement Title II of the ADA, as do FRCP Rule 57 and 28 U.S.C. § 2201. Nothing in the Indiana Constitution, laws, or court regulations that allow such discrimination must stand. All of it must go.

120. A special master should be appointed to determine the broad swath of violations and recommend a thorough reform ORDER that protects me from accusations of “frivolous,” protects me from **any discipline**, and states crystal clear that the 20<sup>th</sup> Century attitudes of court discrimination and **court self-dealing** are now at an end.

#### **PRAYER FOR RELIEF**

121. I demand **\$3,191,969,000** in compensatory damages, **joint and several**, for ADA Title II violations, extreme emotional distress and any other conceivable legal injury from this explosion of judicial shrapnel, *inter alia*. *Barnes v. Gorman*, 536 U.S. 181 (2002). This also includes the constitutional violations, which have been extreme. I also seek mandamus and prohibition relief and injunction relief and any other relief possible under law or equity.

122. This amount is just and proper because my disabilities from crimes inflicted on me were disrespected in the context of my right to practice law. I am a crime victim and the federal courts caused me *more injury* and engaged in *more crimes* to suppress me instead of doing the right thing and punishing Indiana severely.

123. I should be granted law licenses in all state and federal jurisdictions in the United States as a matter of constitutional law, not any court's mere rules. None of those courts must have the ability to label my work frivolous anymore or punish me, since this Court and the Constitution will be the source of my law licenses. This Court should allow me to be a member of its bar.

124. I should be granted the privilege of reviewing any case from any of the defendants and recommend punishment if disability discrimination is present. This must be a permanent privilege and granted to my law firm even after I die. The United States must pay me for such review on an hourly basis (\$1800 per hour)<sup>16</sup> and I must be given the ability to pay staff at the same hourly rate. This Court should assign a case number, take my recommendations under advisement and accept any disability or due process case my firm and I suggest should be reviewed for certiorari, up to 5 cases annually.

125. This Court should ORDER the Indiana Supreme Court to make me and my firm a permanent member of the Indiana Attorney Disciplinary Commission with the sole power to appoint the executive director and remove that officer and any staff members at will, including appointing and removing Commission members.

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<sup>16</sup> <https://abovethelaw.com/2015/08/top-supreme-court-advocates-charge-how-much-per-hour/>

Similarly, I should be appointed to the Indiana Judicial Discipline and Nominations Commission permanently and my firm and I should have power to remove and appoint the executive director and any other staff or commission members of that body at will. The Chief Justice of Indiana is a position that has been abused to injure me and I must have the ability to reverse any judicial or administrative decision made by that officer and remove the Chief Justice of Indiana at my discretion. This will end the abuse, I guarantee it.

126. Similarly, my firm and I should have the ability to remove and appoint the chief judge or chief justice of all defendants here, and the power to reverse any disciplinary decision I find to be faulty or in bad faith. The age of federal court self-dealing and protection of state court discrimination must end now.

127. These powers and immunities flow from Article III, the Fifth Amendment, the Fourteenth Amendment, and the ADA Titles II & V. This Court's plenary power to fashion remedies allows such comprehensive treatment of these problems. While I recognize that my firm and I are taking on a serious burden, everything my firm and I do must be compensated at \$1,800 per hour.

### **JURISDICTION AND VENUE**

128. This Court has jurisdiction over this action under 28 U.S.C. § 1251, as it is an original action jurisdiction matter involving enforcement of the federal Constitution and federal civil rights laws on 3 states and at least 7 U.S. courts, protecting myself. Since this action is the direct result of *Indiana attacking me* and pulling in other states and federal courts for its dirty work, an original action jurisdiction is

warranted in several different ways under statute and constitutional rights without any 11<sup>th</sup> Amendment objection possible given states are on both sides of the question.

129. This jurisdiction and venue is also supported by Article III of the U.S. Constitution and due process because I have no other options in the USA. I rely on this Court as my last resort. The oppression of me has been so terrible and mighty that I live in poverty in the Philippines now and am an **official asylum seeker** because I cannot rely on my disability rights being protected ANYWHERE in the USA until this matter is solved for good. In the meanwhile, I support 4 children without any paternal support, including one with autism and one whose father was murdered.

130. Venue properly lies in the U.S. Supreme Court in Washington, D.C., because I am unable to avail myself of the protections of the federal courts in Indiana or the 7<sup>th</sup> Circuit. I cannot rely on Virginia, Vermont, or Indiana state courts because I have tried unsuccessfully. The VSB 3-judge ORDER, while nice, only appears to have any significance in Virginia. A national legal directory refuses to remove the Indiana discipline, which destroys my disability law reputation.<sup>17</sup>

131. Being banished by the 7<sup>th</sup> Circuit, I must bring my lawsuit where I am not banished and there are U.S. Supreme Court precedents allowing this type of venue choice. As Justice Jackson said, “giv[ing] a plaintiff a choice of courts” is important “so that he may be quite sure of some place to pursue his remedy.” *Gulf Oil Corp v. Gilbert*, 330 U.S. 401, 507 (1945). This is a statement of venue choice and I have no

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<sup>17</sup> <https://www.avvo.com/attorneys/20005-dc-andrew-straw-1901411.html>

such choices where the damage happened or other states, so this is my choice of where my **original action jurisdiction lawsuit** will happen.

### APPOINTMENT OF COUNSEL

132. I should be granted experienced counsel by this Court due to the magnitude of the allegations and I request this.

I, *plaintiff* Andrew U. D. Straw, verify that the above facts and allegations are true and correct under penalty of perjury. This MOTION is made in good faith.  
Date: 4/22/2020 (Earth Day)

Respectfully,



s/ Andrew U. D. Straw  
700 12<sup>th</sup> ST NW STE 700, PMB 92403  
Washington, D.C. 20005  
T (847) 807-5237  
Email: [andrew@andrewstraw.com](mailto:andrew@andrewstraw.com)

### CERTIFICATE OF SERVICE

I, *plaintiff* Andrew U. D. Straw, hereby certify that I filed this **COMPLAINT (WITH VSB ORDER EXHIBIT and IFP MOTION/AFFIDAVIT)** with the Clerk of the United States Supreme Court on 4/22/2020 (Earth Day) via U.S. Mail, postage prepaid, using Docsmit.com

I, Andrew U. D. Straw, hereby certify that on 4/22/2020 (Earth Day), I sent a true and correct paper copy of this **COMPLAINT (WITH VSB ORDER EXHIBIT and IFP MOTION/AFFIDAVIT)**, U.S. Mail, First Class and postage prepaid via Docsmit.com to:

**State of Indiana & Indiana Supreme Court** – to the Indiana Governor and Attorney General

**Commonwealth of Virginia & VSB** – to the Virginia Governor and Attorney General

**State of Vermont and Vermont Supreme Court** -- to the Vermont Governor and Attorney General

**7<sup>th</sup> Circuit U.S. Court of Appeals, U.S. District Courts for the Northern District of Indiana, Southern District of Indiana, Northern District of Illinois, Western District of Wisconsin, and the Districts for Maryland and Vermont – U.S. Department of Justice, Washington, D.C.**

NB: I attempted to seek writs of mandamus and prohibition, but the Clerk of Court returned my documents. I decided to refile as an original jurisdiction action including several states on both sides of the caption, federal courts in the caption, and a variety of violations that cannot stand. This document is in the format of a U.S. District Court complaint since this Rule 17 action is governed by the FRCP.

Respectfully submitted,

A handwritten signature in black ink that reads "Andrew U. D. Straw". The signature is written in a cursive, flowing style.

s/ Andrew U. D. Straw, *Petitioner, Proceeding Pro Se*  
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