

18-808

No.

Supreme Court, U.S.
FILED
DEC 14 2018
OFFICE OF THE CLERK

In The
Supreme Court of the United States

KIRK E. WEBSTER, SR.,)
)
 Petitioner,)
)
 v.)
)
 JAMES N. MATTIS,)
 SECRETARY OF DEFENSE,)
)
 Respondent.)

On Petition For Writ Of Certiorari To
The United States Court Of Appeals
For The Fourth Circuit

PETITION FOR WRIT OF CERTIORARI

Kirk E. Webster, Sr.
Pro Se
43184 GATWICK SQUARE
ASHBURN, VA 20147
703-729-5955

QUESTIONS CONSIDERED FOR REVIEW

- a. Should a settlement agree be rendered legally invalid if the National Geospatial-Intelligence Agency's Associate General Counsel Jack W. Rickert, used Plaintiff's recent stroke to coerced him into a "voluntary" retirement settlement agreement that effectively removed Plaintiff from Federal Service?
- b. Is the 22 August 2017 transfer Order by Judge Christopher Cooper sufficient to establish that the Eastern District of Virginia Court is the proper jurisdiction for Plaintiff's Title VII, and ADEA claims?
- c. Can the lower Court dismiss a timely accepted, processed and investigated Title VII claim, NGA case No. NGAE-13-S02, of retaliation, filed after the June 2012 agreement that is listed in Plaintiff's Court complaint, without allowing Plaintiff to engage in discovery?
- d. Can the lower Court dismiss a timely filed ADEA claim that was before the lower Court and was referenced in Judge Cooper's 22 August 2017 Opinion and Order to be processed because pro se Plaintiffs are not held to same standards as complaints drafted by lawyers?
- e. Shouldn't a settlement agree be rendered legally invalid if coerced by a named discriminating Responsible Management Official (NGA's Associate General Counsel, Jack W. Rickert) in an effort to exonerate himself?
- f. Can an Intelligence agency be held accountable to whistleblower retaliation laws if the violation of law occurred prior to the agency converting to an intelligence agency?

TABLE OF CONTENTS

QUESTIONS PRESENTED	i
TABLE OF AUTHORITIES	iii
INTRODUCTION	1
OPINION AND ORDER BELOW	5
JURISDICTION	5
RULES INVOLVED	6
STATEMENT OF CASE	6
REASONS FOR GRANTING THE WRIT	9
CONCLUSION	18
APPENDIX A-Mandate	1a
APPENDIX B-Stay of Mandate	2a
APPENDIX C-Unpublished	4a
APPENDIX D-Order	6a
APPENDIX E-Report and Recommendation	9a
APPENDIX F- Opinion and Order	19a
APPENDIX G-Denied Petition for Rehearing	29a
APPENDIX H-Stroke Records	31a
APPENDIX-I-DSR	33a

TABLE OF AUTHORITIES

Cases

	Page(s)
<i>Archuleta v. Sullivan</i> , 725 F. Supp. 602 (D.D.C. 1989).....	8, 16
<i>Brown v. Whole Foods Market Group, Inc.</i> , 789 F.3d 146 (D.C. Cir. 2015)	17
<i>Dehaemers v. Wynne</i> , 522 F. Supp. 2d 240, (D.D.C. 2007).....	6, 8, 16
<i>Gardner v. Mabus</i> , 49 F. Supp. 3d 44 (D.D.C. 2014).....	8, 16
<i>Haley v. Astrue</i> , 667 F.Supp.2d 138 (D.D.C. 2009).....	5
<i>Jackson-Spells v. Rumsfeld</i> , 457 F. Supp. 2d 39 (D.D.C. 2006).....	2, 6
<i>Navy v. Egan</i> , 484 U.S. 518 (1988).....	15
<i>Sparrow v. United Air Lines, Inc.</i> , 216 F.3d 1111, (D.C. Cir. 2000)	17

Statutes and Rules

<i>Age Discrimination in Employment Act of 1967</i> (Pub. L. 90-202) (ADEA), as amended, as it appears in volume 29 of the United States Code, beginning at section 621	<i>passim</i>
<i>The Older Workers Benefit Protection Act (OWBPA)</i> (Pub. L. 101-433).....	12
5 U.S.C. 8336(d)	6
28 U.S.C. § 1391	6, 8, 16
42 U.S.C. § 2000e- 5(f)(3)	5
5 CFR 831.503	6
29 C.F.R. § 1614.504(a).....	10

Other Authorities

Presidential Policy Directive – 19 (PPD-19)	15
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WRIT OF CERTIORARI

PRO SE PLAINTIFF IS REQUESTING REVIEW OF SETTLEMENT THAT WAS COERCE DURING PLAINTIFF'S RECOVERY FROM A STROKE THAT FACTORED INTO LACK OF SUBJECT-MATTER-JURISDICTION DISMISSAL OF AGE DISCRIMINATION IN EMPLOYMENT ACT (ADEA) AND TITLE VII RETALIATION CLAIMS

INTRODUCTION

This case is about trying to destroy a Black man and his family because he took a stand against racial (Black) discrimination that he knew was being intentionally committed by the EEOC (James L. Lee) and the National Geospatial-Intelligence Agency's (Jack W. Rickert). NGA's Assistant General Counsel Jack W. Rickert, and EEOC's Deputy General Counsel, James L. Lee colluded to take away Plaintiff's \$122,000 per year job and have prevented Plaintiff from being able to support his family and pay for his children's college education, because Plaintiff exposed corruption they were engaged in to improperly dismiss Black NGA employee's Title VII EEO complaints, as if we are insignificant and don't matter. To make matters worse, they colluded with my wife's employer, the Department of the Navy's Strategic Systems Program (SSP) Office, to keep her from being promoted in nearly twenty years. She is a college graduate who, at the time of this complaint,

has been stuck in a Secretarial job at the GS-06 level or its pay band equivalent for much of her entire 20 plus year career. This was intentionally done by James Lee and his cohorts (NGA's Jack Rickert and SSP's Kevin Keefe) to inflict enough financial strain on Plaintiff and his wife to revoke our security clearances. Plaintiff's wife's case, Webster v. Stackley (17-1472-DLF), was filed at the District of Columbia Federal Court on 24 July 2017. Yet, these two White men (Rickert and Lee) are still gainfully employed, and Plaintiff is without his job; this is a travesty of justice! Shortly after wife's case was filed in Court, SSP's EEO Representative Kevin Keefe retired. In Plaintiff's complaints at ECF 1 and 27, Plaintiff has stated that a stroke he suffered at NGA's Bethesda, MD office, was used to coerce him into signing the June 2012 settlement agreement. Plaintiff wrote a letter to the former EEOC Baltimore Field Office Director James Lee, and later the EEOC's Director of Complaints Adjudication Linda Jackson, that Two NGA officials were colluding with an EEOC Administrative Law Judge under Lee's supervision, to unlawfully dismiss Plaintiff's EEO claims. Plaintiff and his wife (see Webster v. Stackley, ECF 1, pp. 59-73, U.S. District Court for the District of Columbia) later filed EEO complaints of retaliation in March of 2001 that named NGA's Assistant General Counsel, Jack Rickert; NGA's Acting EEO Director, John Sutkowsky; and EEOC Baltimore Field Office Administrative Judge, Charles Shubow (who worked under James Lee's supervision), as Responsible

Officials. Plaintiff's and his wife's formal cases were never investigated, the processing stopped, as if Jack Rickert and his cohorts were above Title VII Civil Rights laws. Since Lee was involved in the violation of Title VII corruption, Plaintiff believes Lee informed NGA's Associate General Counsel Jack W. Rickert that Plaintiff had made the disclosures and Lee later aided the NGA's Associate General Counsel Jack Rickert in retaliating against Plaintiff by negatively influencing the adjudication of Plaintiff's administrative discrimination claims. Plaintiff and his wife, Katrina L. Webster, who works for the Department of the Navy, have been subjected to Whistleblower retaliation because of Plaintiff's disclosures to the EEOC.

In Plaintiff's wife's case, Webster v. Stackley (case No. 17-1472), she is also alleging that EEOC Deputy General Counsel James Lee colluded with the Strategic Systems Programs Office's (SSP's) EEO Representative, Attorney Kevin Keefe, to adversely influence SSP management to not promote Plaintiff's wife for the remainder of her career, after Lee became the General Counsel of the EEOC in the year 2003. Plaintiff's wife's one and only promotion in her entire 20-year career was the year 2000, which is when she was promoted from a GS-05 to a GS-06 Secretary, and has not been promoted again in over 18-years and counting, despite having a Bachelor's degree in Business & Management and Associate degree in Business Administration. EEOC Deputy General Counsel James Lee used his influence and position to

collude with the two agency EEO Attorneys to launch Whistleblower retaliation against Plaintiff and Plaintiff's wife. Lee and his co-conspirators, Rickert & Keefe, intentionally created enough financial debt in Plaintiff and Plaintiff's wife's life that their clearances would be subject to revocation. They successfully revoked Plaintiff's security clearance, but failed at their attempt to revoke Mrs. Webster's. Navy EEO Attorney Kevin Keefe retired (September 2018) after Mrs. Webster's case was filed, Webster v. Stackley (17-1472), at the U.S. District Court for the District of Columbia. Mrs. Webster's case was initially assigned to Judge Christopher Cooper, but was reassigned to Donald Trump's appointed Judge Dabney L. Friedrich in December of 2017, within days of her confirmation.

Plaintiff is asking the Supreme Court to reinstate all claims resolved as a result the coerced settlement contract (due to Plaintiff's stroke, see Pl.'s Compl. at ECF 1, ¶¶ 35-39) that was also finalized under false pretenses by EEOC Federal Sector Mediator Kenneth Morse; see Pl.'s Compl. at ECF 27, pp. 20-21 (also 41-43 exhibits F and G) and Pl.'s Complaint, ECF 27, ¶¶ 93-100.

The United States District Court for the Eastern District of Virginia is the jurisdiction from which review is sought. The dates of orders for which review is sought is Judge Christopher Cooper's 08/22/2017 and Magistrate Ivan Davis' Report and Recommendation dated, 11-14-2018. The U.S.

District Court for the Eastern District of Virginia and Defendant have done their utmost to evade this most important facet of Appellant's case.

OPINION AND ORDER BELOW

The Opinion and Order Written on 22 August 2017 by Judge Christopher Cooper, Transferred Plaintiff's Case To The Proper Jurisdiction, The Eastern District Of Virginia Court, Where It was Later Dismissed Due To Lack Of Subject Matter Jurisdiction.

JURISDICTION

1. Proper Venue

"Venue in Title VII cases against federal employers is governed by 42 U.S.C. § 2000e- 5(f)(3). See 42 U.S.C. § 2000e-16(d). Venue is only proper in the judicial district where: 1) the unlawful employment practice was alleged to occur; 2) the employment records relevant to such practice are maintained and administered; 3) the plaintiff would have worked but for the alleged unlawful employment practice; or 4) if the defendant is not within any of these judicial districts, venue may be proper in the district where the respondent has its principal office. 42 U.S.C. § 2000e-5(f)(3); see, e.g., *Haley*, 667 F. Supp. 2d at 140-41. Based upon all four criteria, venue is proper in the Eastern District of Virginia, the District of Maryland, and the Eastern District of Missouri. Any unlawful

employment practice would have occurred where Webster worked, and NGA is now located in Springfield, Virginia, and was previously headquartered in Bethesda, Maryland.' See Compl. 1, 13; Def.'s Mot. Dismiss 7. Webster does not contest Defendants' assertion that his employment records are stored in either Springfield, Virginia or St. Louis, Missouri. See Def.'s Mot. Dismiss 7. And finally, 'the Department of Defense has its principal office in Arlington, Virginia.' *Jackson-Spells v. Rumsfeld*, 457 F. Supp. 2d 39 (D.D.C. 2006). *Proper venue for ADEA claims is determined by the general venue statute, 28 U.S.C. § 1391. Dehaemers v. Wynne, 522 F. Supp. 2d 240,247-48 (D.D.C. 2007). Under that provision, venue for Appellant's age discrimination claim is proper: 1) where a defendant in the action resides; 2) where a substantial part of the events giving rise to the claim occurred; and 3) where the Appellant resides. 28 U.S.C. § 1391(e).*"

RULES INVOLVED

This case involves United States code: 5 U.S.C. 8336(d) and Code of Federal Regulations: 5 CFR 831.503.

STATEMENT OF CASE

Judge Davis stated in his "Report and Recommendation" that Plaintiffs current claims relate only to the validity and enforcement of the 2012

Settlement Agreement, but this is not true. Appellant's most significant claims currently before the lower Court is his Age Discrimination in employment Act claim (ADEA, which has Title VII race and retaliation too), in which Appellant alleges he was denied his statutory rights to a Discontinued Service Retirement (DSR). The revocation of Plaintiff's security clearance did not disqualify Plaintiff from his statutory rights to a DSR. This was a cruel and malicious Act to intentionally harm Plaintiff, a man with a wife of 20 plus years and 2 Middle School Age children, when his security clearance was revoked. Plaintiff was Denied a Discontinued Service Retirement (DSR) and forced to take a "voluntary" retirement, that effectively ended Plaintiff's career against his will. The claim was filed on 03 February 2015 and is not barred by the 2012 settlement agreement. This claim is agency case **No. NGAE-15-OGC-10** (see ECF 27, p. 2, No. 4) that by law, the Eastern District of Virginia Federal Court most certainly has jurisdiction over to hear Appellant's ADEA and Title VII claims, according to Judge Cooper's 22 August 2017 Transfer Order. The Defendant(s) attempted to confuse matters by making it appear that all of Plaintiff claims before the lower Court were resolved by the June 2012 settlement agreement. Moreover, they tried to further confuse matters because Plaintiff's ADAE claim's case No. NGAE-15-OGC-10 is similar to Plaintiff's wife's case No. NGAE-15-OGC27. Defendant(s) intentionally convoluted the matter to get "the baby thrown out

with the bath water,” and it has worked up to this point.

In Judge Christopher Cooper’s Opinion and Order, dated 22 August 2017, by which Appellant’s case was transferred to the Eastern District of Virginia Federal Court. Judge Cooper stated the following:

*“Appellant indicates in his opposition to Defendants’ motion that he was also subjected to age discrimination, Opp’n to Mot. Dismiss 1, which is governed by the Age Discrimination in Employment Act (“ADEA”).³ Proper venue for ADEA claims is determined by the general venue statute, 28 U.S.C. § 1391. Dehaemers v. Wynne, 522 F. Supp. 2d 240,247-48 (D.D.C. 2007). Under that provision, venue for Appellant’s age discrimination claim is proper: 1) where a defendant in the action resides; 2) where a substantial part of the events giving rise to the claim occurred; and 3) where the Appellant resides. 28 U.S.C. § 1391(e). Courts have consistently transferred cases that raise both Title VII [agency case No. **NGAE-13-S02**] and ADEA claims [Agency case No. **NGAE-15-OGC-10**] to courts where venue is proper for both claims. See, e.g., Archuleta v. Sullivan, 725 F. Supp. 602, 606 (D.D.C. 1989) (holding that pendant venue did not apply to Title VII claim when venue was proper only for ADEA claim); Gardner v. Mabus, 49 F. Supp. 3d 44, 47-48 (D.D.C. 2014) (transferring case with both Title VII and ADEA claims to a district*

where venue was proper for both claims because "there is little reason to split Appellant's claims" and it is "in the interest of justice to transfer the entire complaint").

Therefore, Appellant objects to the lower Courts dismissal of his claims for lack of subject matter jurisdiction. It is an irrefutable fact that Plaintiff's breach of settlement due to retaliation claim (NGAE-13-S02) and Age Discrimination in Employment Act ("ADEA") claim (NGAE-15-OGC10) have jurisdiction in the U.S. District Court for the Eastern District of Virginia.

REASONS FOR GRANTING THE WRIT

In Magistrate Judge Ivan Davis' "Report and Recommendation" he stated the following:

"Plaintiff claims that he involuntarily executed the 2012 Settlement Agreement and that the 2012 Settlement Agreement is "legally invalid[.]" (Compl. ¶¶ 25, 33.) Specifically, Plaintiff alleges that he was "under duress" at the time he agreed to the terms. (Compl, ¶¶ 90, 91.) Plaintiff explains his "duress" stemmed from "his declining health and immediate need for continued healthcare." (Compl. ¶¶ 90.) Plaintiff also "believes" that NGA deliberately failed to inform Plaintiff of "his statutory rights to a [discontinued service retirement,]" (Compl. ¶¶ 64-73), and that NGA's failure to inform Plaintiff of this alternative retirement option "forced" Plaintiff to accept the terms of the 2012

***Settlement Agreement. (See Compl. ¶¶ 40-43.)
Additionally, Plaintiff claims that NGA
breached the 2012 Settlement Agreement and
requests that his “underlying complaint” be
reinstated pursuant to 29 C.F.R. § 1614.504(a).
(Compl. ¶¶ 101-13.)***

Judge Davis’s statement is not an accurate quote or explanation of what Plaintiff stated in his Complaint at ECF 27, ¶ 34, that is, “Plaintiff had a stroke at the Bethesda Maryland location of the National Geospatial-Intelligence Agency’s (NGA’s) former Headquarters on 10 November 2010” and was desperately in need of his healthcare. NGA, knowingly used Plaintiff’s medical crisis against him to Coerce Plaintiff into signing the June 2012 settlement agreement. NGA revoked Plaintiff’s security clearance on 17 June 2011, which was 7-months after Plaintiff’s stroke. On the day Plaintiff’s security clearance was revoked, NGA’s HR Representative, Nancy Moore, deliberately failed to inform Plaintiff, a recent stroke victim, of his eligibility (age 52 and 23 years of Federal Service) for Discontinued Service Retirement (DSR), which provides an immediate annuity, and health & life insurance. Instead, NGA placed Plaintiff on a year of unpaid indefinite suspension. Force Plaintiff into incurring a debt of having NGA pay for Plaintiff’s healthcare until/if Plaintiff’s security clearance is reinstated. NGA later used this incurred healthcare debt to retaliate against Plaintiff after the June 2012

settlement agreement was executed and Plaintiff had received his Voluntary Separation Incentive (VSIP) payment, even though the agreement was supposed to resolve everything that came out of Plaintiff's employment with NGA. Plaintiff was still under the care of stroke doctors and in desperate need of his healthcare insurance. NGA's Associate General Counsel Jack Rickert, used Plaintiff's desperate health situation to force Plaintiff into a "voluntary" retirement that would end Plaintiff's career at NGA. The NGA's Assistant General Counsel Jack Rickert, told Plaintiff to his face, in the company of EEOC Mediator Kenneth Morse, that NGA would not give Plaintiff the Discontinued Service Retirement that Rickert had promised Plaintiff in a meeting with Administrative Judge Cynthia McKnight. The details of Plaintiff's coerced retirement is well documented in the Investigative File (IF) for agency case No. NGAE-13-S02 which was before the lower Court, but intentionally ignored as if it didn't exist. This claim was filed after the June 2012 settlement agreement. Plaintiff and NGA's Assistant General Counsel Jack Rickert's interactions are well-documented in the Investigative File (IF) for NGAE-13-S02, which was filed, processed, and accepted for investigation by NGA's EEO office well after the June 2012 settlement agreement. This Title VII claim was dismissed by the Eastern District of Virginia Court without allowing Plaintiff to engage in Discovery. The investigative file for NGA case No. NGAE-13-S02 is replete with documented evidence that mainly Jack Rickert has

for year retaliated and discriminated against Plaintiff according to his race & age. Jack Rickert and NGA's Benefits Manager, John Zimmerman, knowingly denied Plaintiff valuable retirement benefits he was eligible for, thus intentionally violating ADEA and OWBPA laws. Judge Davis left out this most significant and compelling reason, that NGA's Associate General Counsel Jack W. Rickert used Plaintiff's recent stroke to force him into executing the June 2012 settlement agreement. This is one of the reasons why Plaintiff stated the claims resolved as a result of the 2012 settlement agreement must be rendered invalid. Plaintiff believes there is something unlawful about an official who's the subject of whistleblowing, using his position to force a settlement that exonerates him as a Responsible Management Official. Plaintiff believes there is something unlawful about Jack Rickert coercing a settlement agreement that eliminates him from blame, guilt or Responsibility for his actions. Plaintiff is asking the Supreme Court to render the June 2012 settlement agreement null and void for this very reason. The June 2012 settlement agreement was signed by all parties as of 01 June 2012, but had to go through a 7-day waiting period, due to ADEA law regarding waiver of claims agreements. EEOC Mediator Kenneth Morse stated he was holding onto the settlement after the seven-day ADEA revocation waiting period, to ensure Plaintiff received what was promised in the settlement agreement. EEOC Mediator Kenneth Morse prematurely finalized the

2012 settlement agreement prior to meeting with Plaintiff (see ECF 27, p. 14), and well before Plaintiff had received the annuity, health, and life insurance portion of the Voluntary Early Retirement Authority (VERA) facet of the VERA/VSIP (Voluntary Separation Incentive Payment) retirement settlement. Morse also stated if Plaintiff didn't receive the annuity by 30 July 2012, he (Mr. Morse) would inform AJ McKnight that mediation didn't work. (see Pl.'s Compl. At ECF 27, pp. 20-21 and Pl.'s Complaint, ECF 1, ¶¶ 93-100.

NGA had Defense Finance and accounting Service (DFAS) send plaintiff a demand notice to collect \$7,449.18 in past healthcare debt that was supposed to be resolved by language in the settlement agreement (see ECF 1, pp. 136-140). It wasn't until Plaintiff paid the \$7,449.18 that Plaintiff's annuity, health, and life insurance went into effect. Demanding that Plaintiff pays \$7449.18 to get his Voluntary Early Retirement Authority (VERA) led to the filing of agency case number NGAE-13-S02 (see Pl.'s Complaint, ECF 1, ¶¶ 101-148), which was accepted, processed, and investigated by the NGA EEO office as a separate Title VII claim, yet it was improperly dismissed by the lower Court without allowing Plaintiff to engage in discovery.

As stated in Judge Cooper's 22 August 2017 Opinion and Order, Plaintiff faults EEOC Federal Sector Mediator Kenneth Morse, for lying to Plaintiff

and finalizing the agreement before he and Plaintiff had the 30 July 2012 meeting. Therefore, the settlement agreement was never legally finalized. The actions of EEOC Mediator Kenneth Morse is yet another reason why the June 2012 settlement agreement must be rendered null and void, as Plaintiff explained in his 45-page Complaint, pp. 20-21 at ECF 27 and Pl.'s Complaint, ECF 27, ¶¶ 93-100. The June 2012 settlement agreement is linked to numerous acts of Title VII racial discrimination & retaliation that is linked to NGA's recent admission to the Press via "5 On Your Side" News, that NGA admits to years of racial discrimination and retaliation against its Black employees. Shortly after the dismissal of Plaintiff's case was affirmed by the Fourth Circuit Court of Appeals, the NBC's St. Louis affiliate, "5 On Your Side" reported, on 25 August 2018, that the "National Geospatial-Intelligence Agency (NGA) admits to years of racial discrimination. Please one of see the following two links:

<https://www.ksdk.com/article/news/investigations/federal-agency-admits-to-years-of-racial-discrimination/63-587359549>

<https://www.youtube.com/watch?v=ivnCS8XKyHg>

Plaintiff also believes the NGA is guilty of discriminating against him according to his age and race during the time-frame NGA has admitted to.

Plaintiff also believes the NGA has abused *Navy v. Egan*, 484 U.S. 518 (1988), to retaliate against him for blowing the whistle on the corruption and collusion between EEOC's James L. Lee and NGA's Jack Rickert, to improperly dismiss Black NGA employees Title VII race and retaliation claims, and this is what has led to the revocation of Plaintiff's security clearance. In short, NGA has abused *Navy v. Egan*, 484 U.S. 518 (1988), to revoke Plaintiff's security clearance to hide corruption. *Navy v. Egan*, 484 U.S. 518 (1988), must be repealed because it is being used as a retaliatory tool to silence intelligence agency employees from exposing corruption. Presidential Policy Directive - 19 (PPD-19) [is supposed to] "provides protections for Intelligence Community (IC) employees against personnel actions taken in reprisal for lawfully participating in the whistleblowing process. In addition, employees and contractors are [supposed to be] protected from reprisals in the security clearance adjudication process."

AGE DISCRIMINATION IN EMPLOYMENT ACT (ADEA)

In Judge Christopher Cooper's Opinion and Order, dated 22 August 2017, by which Plaintiff's case was transferred to the Eastern District of Virginia Federal Court, Judge Cooper stated the following:

“Plaintiff indicates in his opposition to Defendants’ motion that he was also subjected to age discrimination, Opp’n to Mot. Dismiss 1, which is governed by the Age Discrimination in Employment Act (“ADEA”).³ Proper venue for ADEA claims is determined by the general venue statute, 28 U.S.C. § 1391. *Dehaemers v. Wynne*, 522 F. Supp. 2d 240,247-48 (D.D.C. 2007). Under that provision, venue for Plaintiff’s age discrimination claim is proper: 1) where a defendant in the action resides;

2) where a substantial part of the events giving rise to the claim occurred; and

3) where the plaintiff resides. 28 U.S.C. § 1391(e). Courts have consistently transferred cases that raise both Title VII [**agency case No. NGAE-13-S02**] and ADEA claims [**Agency case No. NGAE-15-OGC-10 (attachment 2)**] to courts where venue is proper for both claims. See, e.g., *Archuleta v. Sullivan*, 725 F. Supp. 602, 606 (D.D.C. 1989) (holding that pendant venue did not apply to Title VII claim when venue was proper only for ADEA claim); *Gardner v. Mabus*, 49 F. Supp. 3d 44, 47-48 (D.D.C. 2014) (transferring case with both Title VII and ADEA claims to a district where venue was proper for both claims because “there is little reason to split Plaintiff’s claims” and it is “in the interest of justice to transfer the entire complaint”),

Therefore, Plaintiff objects to the lower Courts dismissal of his claims for lack of subject matter jurisdiction. It is irrefutable that the lower court has

jurisdiction to hear Plaintiff's Title VII and Age Discrimination in Employment Act (ADEA) claims, as stated in Judge Christopher Cooper's 22 August 2017 Order and Opinion. Moreover, even the U.S. Attorneys initially assigned to this case in the District of Columbia, requested that these Title VII and ADEA claims be transferred this case to the Eastern District of Virginia Court. Plaintiff's Title VII (**NGAE-13-S02 claim**) and Age Discrimination in Employment Act ("ADEA") claim (**NGAE-15-OGC10**) have jurisdiction in the U.S. District Court for the Eastern District of Virginia, as Judge Cooper stated in his 22 August 2017 transfer Order:

"Although Plaintiff does not explicitly invoke the ADEA, *pro se* plaintiffs are held "to less stringent standards than formal pleadings drafted by lawyers." *Sparrow v. United Air Lines, Inc.*, 216 F.3d 1111, 1113 n.2 (D.C. Cir. 2000) (quotations omitted). See also *Brown v. Whole Foods Market Group, Inc.*, 789 F.3d 146, 152 (D.C. Cir. 2015) (holding that courts should consider all allegations in *pro se* plaintiffs' pleadings before dismissing a case (see appendix 1).

CONCLUSION

Plaintiff is requesting that his case is remanded to the lower Court for processing and that the coerced settlement is deemed legally invalid. Plaintiff is also requesting that he is also allowed to engage in discovery for all his ADEA and Title VII claims that are not part of the June 2012 settlement agreement.

Respectfully submitted,

Kirk E. Webster, Sr.
43184 Gatwick Square
Ashburn, VA 20147