

IN THE SUPREME COURT OF THE UNITED STATES  
AGAINST PETITION FOR CERTIORARI  
IN RE EXECUTIVE ORDER 13998: SAFER TERMINATIONS OF PREGNANCIES

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*Petition submitted by President Adith\_MUSG*

## **I. QUESTIONS PRESENTED**

1. Does Executive Order 13998 fall within the authority conferred by the Occupational Safety and Health Act of 1970 (29 USC 15) on the Secretary of Labor to make rules about workplace safety?

## **II. TABLE OF AUTHORITIES AND SOURCES**

### *Statutes*

1. [29 U.S.C 15](#)

### *Executive Orders*

1. [E.O. 13998: Safer Terminations Of Pregnancies](#)
2. [Executive Order 13994: Right to Life](#)

## **III. FACTS**

- A. On the 28th of December, 2021, I, in my official capacity as 47th President of the United States, issued Executive Order 13998.

The Executive Order:

1. Forbids medical professionals from carrying out medical procedures that result in the loss of life of a human child, using President Ninjjadragon's definition of life (Exec. Order No. 13994)
2. Imposes penalties under OSHA regulations on violators of the Executive Order.

## **IV. ANSWERING QUESTIONS PRESENTED**

- 1. Does Executive Order 13998 fall within the authority conferred by the Occupational Safety and Health Act of 1970 (29 USC 15) on the Secretary of Labor to make rules about workplace safety?**

As outlined by the Petitioner, the Occupational Safety and Health Act confers upon the Secretary of Labor the authority to make rules regarding workplace safety. This would include the right of

employees to a safe workplace, where murders are not deliberately carried out by employees resulting in deaths at the workplace.

*29 U.S. Code § 654 (b) - Each employee shall comply with **occupational safety and health standards** and all rules, regulations, and orders issued pursuant to this chapter which are applicable to his own actions and conduct.*

*29 U.S. Code § 652(8) - The term “occupational safety and health standard” means a standard which requires conditions, or the adoption or use of one or more practices, means, methods, operations, or processes, reasonably necessary or appropriate to provide **safe or healthful employment** and places of employment.*

It follows that the practice of a procedure that results in an act of denial of the right to life (as defined in Exec. Order No. 13994) does not constitute a safe or healthful place of employment. Indeed, terms of employment at centers where pregnancy terminations are carried out would constitute coercion of employees to work in unsafe conditions under threat of termination of employment.

This is precisely the type of employer overreach and abuse that the Occupational Safety and Health Act seeks to combat. Hence it is clear that the Secretary of Labor has the authority under OSHA to promulgate this rule.

## **V. REMEDIES SOUGHT**

The State seeks that:

1. The petition be dismissed.

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Submitted to the United States Supreme Court by Mr. Adith\_MUSG on the 6th of January, 2022