Case No: 18-6522

In The Supreme Court of the United States

ROBERT R. PRUNTY,
PETITIONER

VS.

THE SCHOOL DISTRICT OF OF DESOTO COUNTY FLORIDA, ET AL; THE AGENCY FOR HEALTHCARE ADMINISTRATION,(AHCA)ET AL & THE JACK NICKLAUS MIAMI CHILDREN'S HOSPITAL, ET AL,

---

RESPONDENTS.

ON PETITION FOR A WRIT OF CERTIORARI TO ELEVENTH CIRCUIT COURT OF APPEALS PANEL, CASE NO: 17:14891

PETITIONER'S REPLY BRIEF TO THE SCHOOL DISTRICT OF DESOTO COUNTY'S LONE BRIEF IN OPPOSITION TO PETITIONER'S ORIGINAL WRIT SEEKING CERTIORARI, AND REGARDING THE NEW ISSUE OF SANCTIONS RESPONDENTS NOW SEEK AGAINST PETITIONER

ROBERT R. PRUNTY
PRO SE' PETITIONER
427 WEST HICKORY STREET
ARCADIA, FLORIDA 34266
(863) 991-5195

TABLE OF CONTENTS

TABLE OF AUTHORITIES

CONTESTED ISSUES OF OPPOSITION

I. BECAUSE THE RESPONDENTS HAD ALREADY ACCESSED PETITIONER'S MEDICAID AND EDUCATIONAL BENEFITS UNLAWFULLY FOR THE FIRST TIME IN 2011,AND WITHOUT PARENTAL CONSENT, AND SYSTEMATICALLY CONTINUED SUCH ACTIONS UP UNTIL THE PRESENT DAY, A STATE ADMINISTRATIVE JUDGE INVOLVED IN EXHAUSTION OF STATE REMEDY MATTERS, HAS LONG AGO LOST JURISDICTION OVER ANY PARENTS COMPLAINING ABOUT EXCLUSION UNTIL 34 C.F.R 300.154 HAS BEEN FULLY COMPLIED WITH.

II. ALTHOUGH PETITIONER HAS FILED SEVERAL SEPARATE ACTIONS, THE GRAVAMEN OF SUCH ACTIONS HAVE ALWAYS BEEN THE SAME REGARDING THE TOTAL EXCLUSION OF PARENTS FROM THE SCHOOL ENROLLMENT PROCESSES AND NOT F.A.P.E. OR OTHER CHILD DISABILITY OR EDUCATIONAL MATTERS.

III. RESPONDENTS GROUNDLESS DECLARATION THAT IT BELIEVES PETITIONER'S CLAIM IS FRIVOLOUS SHOULD BE ANALYZED UNDER FEDERAL RULE OF CIVIL PROCEDURE RULE 11b STANDARDS, SINCE THE CONSTANT FALSE NARRATIVES OF RESPONDENTS FALL FAR SHORT OF RULE 11b MANDATES AS WELL AS LACKING CANDOR BEFORE FEDERAL TRIBUNALS.

IV. THE FIRST CONSTITUTIONAL AMENDMENT FORBIDS SPEECH CRITICAL OF THE GOVERNMENT AND ANY ATTEMPTS TO CHANGE U.S. SUPREME COURT RULINGS SHOULD BE VIEWED AS SUCH.

STATEMENT OF THE FACTS

Despite Petitioner constantly informing respondents that it was he, and none other who was wronged by the years long policy of exclusion employed by respondents, which completely contravenes **34 C.F.R. 300.154 et seq.**, the same rhetoric claiming Petitioner has a case concerning children is still being utilized by the Respondents, in face of the plain script of the actual Complaint in this case. **(See: Supplemental Appendix A—First Amended Complaint).**

34 C.F.R. 300.154 does not relate to children, but instead, only parents. Furthermore, and contrary to the Desoto County School Districts claim that Petitioner previously filed "numerous complaints", the fact of the matter is that there have only been (4) four actions filed, which will be described below:

Action One: Appendix A— Known as Cases 1:14-cv-20834 and 2:14-cv-00313, Petitioner alleged that several drug companies were forcing innocent persons to consume dangerous drugs with school assistance in violation of the 13th Amendment. The Complaint alleged violations of Title VI and IDEA based upon Race Discrimination, The Rehabilitation Act, (which has since been abandoned) due to the long time systematic exclusion of parents, The Florida Deceptive and Unfair Trade Practices Act, the 13th Amendment and Gross & Intentional Negligence.

In the relief section, Petitioner sought to declare unconstitutional, the Respondents Systematic Policy of exclusion from I.D.E.A. and Title VI supported programs. No relief was sought concerning education or a F.A.P.E.

Action Two: Appendix B—Known as Case 2:15-cv-00105, Petitioner again directed the action at drug companies who were allegedly using schools to cause ingestion of dangerous drugs into minor children. The Complaint alleged violations of Title VI, 42 U.S.C. 1983 & 42 U.S.C. 1981. In the relief section, no relief is sought for children or under the I.D.E.A or a F.A.P.E.

Action Three: Appendix C—Known as Case 2:16-cv-00577, Petitioner again alleged violations of Title VI by discrimination, the systematic policy of exclusion from I.D.E.A. programs and processes, 42 U.S.C. 1985, 4th and 14th Amendment violations, The Parental Rights and

Responsibilities Act of 1995, Invasion of Privacy and Intentional Infliction of Emotional Distress. In the Relief section, no relief is sought concerning a F.A.P.E. or any other I.D.E.A. related relief regarding education, children or medical issues.

Action Four, Appendix D-(Present Action)—Known as Case 2:17-cv-00291, Petitioner alleged violations of 42 U.S.C. 1983, 42 U.S.C 1985, Invasion of Privacy, Negligence ,Intentional Infliction of Emotional Distress and Race Discrimination. In the Relief Section Petitioner sought to declare Florida Statutes 1003.57 and Florida Board of Education Rule 6A-6.03411 Unconstitutional. No relief is sought concerning F.A.P.E. or any other educational or disability related issues, but only a parents Constitutional Right to control the educational destiny of their children. There is no remedy available under I.D.E.A. that covers circumstances of when a party has a systematic policy of failing to obtain parental consent, as a matter of fact and law. (See: **34 C.F.R. 300.154 et seq.).

Furthermore, I.D.E.A. only concerns itself with **Children** and their Education and whether or not a **Child** received a F.A.P.E. (See: **20 U.S.C. 1400**).

There is no relief available for Parents who are systematically excluded from I.D.E.A. processes. Therefore, any decision by a hearing officer on a request for substantive relief "**shall**" be "based on a

determination of whether the **child** received a free appropriate public education." (See: 20 U.S.C.1415(f)(3)(E)(i). In this case, such was never possible since the person aggrieved is an adult parent and not a child.

Thus, Exhaustion of Administrative Remedies is futile when Parental Consent has not been obtained pursuant to **34 C.F.R. 300.154** and when a Parents Constitutional Rights are at issue. (See: **Assoc. for Retarded Citizens of Ala. v. Teague, 830 F. 2d 158 (11th Cir. 1987), Alifano v. Sanders, 430 U.S. 99, 109 (1977)** ("Constitutional questions obviously are unsuited to resolution in administrative hearing procedures and, therefore, access to the courts is essential to the decision of such questions."); **Oestereich v. Selective Servs. Bd., 393 U.S. 233, 242 (1968) (Harlan, J., concurring); Buckeye Indus., Inc. v. Secretary of Labor, 587 F.2d 231, 235 (5th Cir. 1979)** ("No administrative tribunal of the United States has the authority to declare unconstitutional the Act which it is called upon to administer."); **Spiegel, Inc. v. FTC, 540 F.2d 287, 294 (7th Cir. 1976), Planned Parenthood of Southeastern Pennsylvania v. Casey, 112 S. Ct. 2791, 2808 (1992) & Public Utilities Commission v. United States,**

Therefore, a Petitioner need not "demonstrate" whether the administrative process would be futile, when it plainly is already, as a matter of fact and law. For instance, when issues arise under **I.D.E.A.** relating to children, there is a mandatory (2) two year

statute of limitations that would have expired long ago in this case, if children's rights were ever at issue.

In conclusion, all of Petitioners previous actions, viewed in totality, sought to obtain answers to questions presented by the Respondents bold and sinister actions, compared to laws Respondents appeared to be ignoring systematically and simultaneously.

Therefore, it is believed by this Petitioner that this Supreme Court forum will solve the problems of modernized separate but equal types of exclusion, confusion and disparity that presently exists regarding the issue of **Parental Consent** in todays educational context.

PROCEDURAL HISTORY

Petitioner concurs with Respondents description of previous actions and their conclusions.

PETITIONER'S REPLY IN OPPOSITION

I. BECAUSE THE RESPONDENTS HAD ALREADY ACCESSED PETITIONER'S MEDICAID AND EDUCATIONAL BENEFITS UNLAWFULLY FOR THE FIRST TIME IN 2011,AND WITHOUT PARENTAL CONSENT, AND SYSTEMATICALLY CONTINUED SUCH ACTIONS UP UNTIL THE PRESENT DAY, A STATE ADMINISTRATIVE JUDGE INVOLVED IN EXHAUSTION OF STATE REMEDY MATTERS, HAS LONG AGO LOST JURISDICTION OVER ANY PARENTS COMPLAINING ABOUT EXCLUSION UNTIL 34 C.F.R 300.154 HAS BEEN FULLY COMPLIED WITH.

As an initial matter, it must be stated that, a lawful I.E.P. Contract cannot exist without compliance with **34 C.F.R. 300.154**, as a matter of

fact and law. Although Petitioner indeed "started down the road" to Administrative Proceedings, such an effort was curtailed by the agency itself when it was revealed to Petitioner that the **I.D.E.A.** was only concerned with a **F.A.P.E.** for children and not when a persons private and Constitutional rights have been violated.

When this fact was learned, Petitioner refused to proceed further with such Administrative Proceedings due to such a reality. However, and in any event, that same State Administrative Agency lost all Jurisdiction over Petitioner when it became clear that **34 C.F.R. 300.154** was never complied with. In such a scenario, any inferior court would also lose jurisdiction due to such non-compliance.

Only a United States Federal Judge or this Honorable Supreme Court can remedy such a situation, where a person has been denied Due Process of Law and it's Constitutional Rights have been allegedly violated due to any Governmental oversight or inadvertence.

Therefore, an independent Federal Judges' judicial authority has jurisdiction since it can demand and receive respect and obedience, even from presidents….whereas, Administrative Law Judges are subject to doubts about their independence, due in large part to their employment status as agency personnel. **(See: Jeffrey S. Lubbers, Federal Administrative Law Judges: A Focus On Our Invisible Judiciary, 33 ADMIN. L. REV. 109, 110 (1981)).**

Only children with a handicap fall within the ambit of **I.D.E.A.** and it's remedies, and "the very basis for the handicapped child's entitlement to an individualized and appropriate education is the individualized educational program" ("IEP"), that a school system must design to meet the unique needs of each child with a disability." ***Phillip C. v. Jefferson County Bd. of Educ., 701 F. 3d 691, 694 (11th Cir. 2012), citing Doe v. Ala. State Dep't of Educ., 915 F.2d 651, 654 (11th Cir. 1990) and Winkelman v. Parma City Sch. Dist., 550 U.S. 516, 524 (2007) (internal quotation marks omitted). See also Honig v. Doe, 484 U.S. 305, 311 (1988).***

In this case, instead of the Respondents separating black and white students into separate schools, ***(as in Brown v. Board of Educ.)***,the Respondents are actively "excluding parents", surreptitiously, and then unilaterally separating students into improper categories created by them ***without*** parental consent, all to the detriment of parents and their minor children, systematically. (***See: Brown v. Board of Education of Topeka, 347 U.S. 483 (1954)***. Hence, this case closely mirrors the intent and goals of the previous "Separate but Equal" regime and case scenario of **Brown v. Board of Education.**

Furthermore, all Courts lack Jurisdiction until the proper pleadings are filed. ***(See: Cortina v. Cortina, 98 So. 2d 334, 337 (Fla. 1957); Aldridge v. Peak Prop. & Cas. Ins. Corp., 873 So. 2d 499, 501 (Fla. 2d***

D.C.A. 2004); Carroll & Assocs., P.A. v. Galindo, 864 So. 2d 24, 28 (Fla. 3d D.C.A. 2003); Instituto Patriotico Y Docente San Carlos v. Cuban Am. Nat'l Found., 667 So. 2d 490, 492 (Fla. 3d D.C.A. 1996).

II. ALTHOUGH PETITIONER HAS FILED SEVERAL SEPARATE ACTIONS, THE GRAVAMEN OF SUCH ACTIONS HAVE ALWAYS BEEN THE SAME REGARDING THE TOTAL EXCLUSION OF PARENTS FROM THE SCHOOL ENROLLMENT PROCESSES AND NOT F.A.P.E. OR OTHER CHILD DISABILITY OR EDUCATIONAL MATTERS.

To be more precise, it must be further illustrated here that the gravamen of Petitioner's actions have always been about Constitutional violations for discrimination and intentional exclusion from **Title VI, I.D.E.A.** and **Rehabilitation Act** program participation. In action one, Petitioner sought relief for Respondents allegedly working with drug companies to induce minor children to ingest harmful drugs.

In action two, virtually the same allegations were continued. In action three, Petitioner merely repeated it's claims of total exclusion and discrimination by the Respondents. In action four, the same basic allegations concerning discrimination, and Constitutional violations of the Respondents are made.

However, the relief sections of all those actions fails to allege Petitioner is seeking relief that is available under I.D.E.A. **(See: Fry v. Napoleon Community School District)**, where it was held that Exhaustion of the IDEA's administrative procedures is unnecessary where the gravamen of the plaintiff's suit is something other than the

denial of the IDEA's core guarantee of a FAPE. **(See: Fry v. Napoleon Community School District).**

The language of **§1415(l)** compels exhaustion when a plaintiff seeks "relief" that is "available" under the IDEA. Establishing the scope of **§1415(l)**, then, requires identifying the circumstances in which the **IDEA** enables a person to obtain redress or access a benefit. That inquiry immediately reveals the primacy of a **FAPE** in the statutory scheme. The IDEA's stated purpose and specific commands center on ensuring a **FAPE** only for children with disabilities.

Thus, any decision by a hearing officer on a request for substantive relief **"shall"** be "based on a determination of whether the **child** received a free appropriate public education." **§1415(f)(3)(E)(i).** Accordingly, **§1415(l)**'s exhaustion rule hinges on whether a lawsuit seeks relief for the denial of a **FAPE.** If a lawsuit charges such a denial, the plaintiff cannot escape **§1415(l)** merely by bringing the suit under a statute other than the IDEA. But if the remedy sought in a suit brought under a different statute is not for the denial of a FAPE, then exhaustion of the IDEA's procedures is not required. **(Quoting Fry, Supra).**

****Please take notice that the above argument is totally lacking in Respondents Brief in Opposition, which needs such an argument to justify it's false narratives…..**

In determining whether a plaintiff seeks relief for the denial of a **FAPE**, what matters is the **gravamen** of the plaintiff's complaint, setting aside any attempts at artful pleading. That inquiry makes central the plaintiff's own claims, as **§1415(l)** explicitly requires in asking whether a lawsuit **"in fact seeks relief available under the IDEA"**.

In addressing whether a complaint fits that description, a court should attend to the diverse means and ends of the statutes covering persons with disabilities. The **IDEA** guarantees individually tailored educational services for children with disabilities, while **Title II** and **§504** promises nondiscriminatory access to public institutions for people with disabilities of all ages. **(See: Fry, Supra.)**

This Petitioner's actions have never even come close to qualifying for the above description illustrated in Fry when it described other statutes which could also be termed seeking **"relief also available under IDEA"**.

One clue to the gravamen of a complaint can come from asking a pair of hypothetical questions. First, could the plaintiff have brought essentially the same claim if the alleged conduct had occurred at a public facility that was not a school?

—In this case, the answer would be an emphatic **YES**, since **34 C.F.R. 300.154** mandates that school officials obtain parental consent **before** they can proceed with the I.E.P. process, which is based upon services being selected and previously paid for before the service can be considered a part of a child's future curriculum or IEP Plan.

The statute requires parents to give their informed consent before such services can be accessed for the first time by interested officials, or else the Respondents have not afforded Due Process to **I.D.E.A.** and **Title VI** program participants.

The same legal factors regarding Parental Consent and minor children are involved before minors can enter a **"Public Theater".** Likewise, To enter **"The Armed Forces" a person must have Parental Consent if under 18.**

In order to obtain employment when under 16 years of age, there must be Parental Consent.

To obtain a **"Drivers Learners Permit"** you must have parental permission if under 18.

Children under 18 years of age cannot be tattooed without parental permission.

Doctors need Parental Consent before operating on a child under 18 years of age.

Out of town school trips always require parental consent before the child under 18 can attend the trip. Likewise,

Fashion Models cannot work without Parental Consent until they are 18 years of age. Obviously, **34 C.F.R. 300.154** operates along the same vein as other statutes relating to **Parental Consent.**

Secondly, and in response and perfect accord with the emphatic **YES** answer described above, any other Adult or parent with a Child enrolled at the School could press the same claim if the particular School in question also maintained a systematic policy of refusing to obtain parental consent pursuant to **34 C.F.R. 300.154** before starting the **I.E.P. process.** Therefore, **YES** would be the answer to both Supreme Court questions set forth in Fry regarding this Case.

Therefore, it can be easily shown that this Petitioner's present and previous actions have never **"expressly alleged a denial of F.A.P.E."**, since such civil actions have never been about such a subject. **(Citing Napoleon v. Fry, Supra.)**

III. RESPONDENTS GROUNDLESS DECLARATION THAT IT BELIEVES PETITIONER'S CLAIM IS FRIVOLOUS SHOULD BE ANALYZED UNDER FEDERAL RULE OF CIVIL PROCEDURE RULE 11B STANDARDS, SINCE THE CONSTANT FALSE NARRATIVES OF RESPONDENTS FALLS FAR SHORT OF RULE 11B MANDATES AS WELL AS LACKING CANDOR BEFORE FEDERAL TRIBUNALS

In this case, the Respondents were well aware that there was no way on God's Green Earth that they could prove this Petitioner brought a case

about children being denied a **F.A.P.E.** Instead, they created a false narrative that assumes Petitioner did just that.

However, such contentions were misplaced in this case, since Attorneys are not allowed to provide a "lack of candor" before Court Tribunals, as a Matter of fact and law.

Please See **Model Rules of Professional Conduct, Rule 3.3**

A Lawyer shall not knowingly: (1.) make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer.

In this case, and especially before this Supreme Court Tribunal, Respondents have once again claimed:

"Prunty's claims are related to whether his children have received an education that meets their needs and whether his rights as a parent have been protected. His claims are the exact type of concerns that the I.D.E.A. was intended to address"…(See: Respondents Brief in Opposition, pg. 6., par. 1)

However, the truth of the matter would show that this Petitioner has never made any statements or contentions that would imply Petitioner was filing suit about children's educational needs. **(See: All previous Complaints filed by this Petitioner, Appendix A, b, C & D).**

In not one of Respondents filings does it ever mention it's practice and policy of exclusion that violates **34 C.F.R. 300.154,** and thereby extinguishes subject matter jurisdiction in any case where the mantra of "Exhaustion of Administrative Remedies" is being chanted by Respondents in the manner done here.

Such neglect by Respondents to acknowledge the complete lack of Jurisdiction caused by failing to abide by **34 C.F.R. 300.154**, is tantamount to carrying on a litigation known to be frivolous merely to gain a favorable ruling later, howbeit unlawful, against Petitioner's precise and on point claims against Respondents years long and systematic policy of robbing the United States Federal Government and naive and unsuspecting parents under the auspices of **Title VI** and **IDEA**, while systematically excluding myriad parents/beneficiaries from the school enrollment processes outlined by the **United States Congress** with its enactment **34 C.F.R. 300.154.**

Counsel for the Respondents is well-aware of the Statute **34 C.F.R. 300.154**, and it is equally aware that failure to acknowledge this statute in it's filings and responses to Petitioner and the effects of it's existence upon this case, is tantamount to "Fraud Upon The Court", and coupled with a violation of **FRCP Rule 11b**, such actions also exhibit a lack of candor before this Honorable Federal and Supreme Court Tribunal.

"A lawyer shall not knowingly —(2) fail to disclose to the tribunal legal authority in the controlling jurisdiction known to the lawyer to be directly adverse to the position of the client and not disclosed by opposing counsel; or—(3) offer evidence that the lawyer knows to be false…..

IV. THE FIRST CONSTITUTIONAL AMENDMENT FORBIDS SPEECH CRITICAL OF THE GOVERNMENT AND ANY ATTEMPTS TO CHANGE UNITED STATES SUPREME COURT RULINGS SHOULD BE VIEWED AS SUCH.

First Amendment to the United States Constitution

"Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of people peaceably to assemble, and to petition the government for a redress of grievances."

Arguably, any United States Courthouse where cases are decided and the results subsequently published, could be, and should be viewed as "Publishers of Legal News". In New York Times Co. v. Sullivan, 376 U.S. 254 (1964), The Supreme Court held that news publications could not be sued for libel by public officials unless the plaintiffs were able to establish actual malice in the false reporting of a news story.

The Court ruled for *The Times*, 9–0. The rule of law applied by the Alabama courts was found constitutionally deficient for its failure to provide safeguards for freedom of speech and of the press, as required by the First and Fourteenth Amendment. The decision further held that even with the proper safeguards, the evidence presented in the case was insufficient to support a judgment for Sullivan.

In sum the court ruled that "the First Amendment protects the publication of all statements, even false ones, about the conduct of public officials except when statements are made with actual malice ***(with knowledge that they are false or in reckless disregard of their truth or falsity)."***

In this case, the record evidence will reflect and show, that all parties were well aware of **34 C.F.R. 300.154**, yet did or said nothing about the fact that the statute spells a loss of Jurisdiction over the entire Subject Matter of any **I.D.E.A.** case.

In this light and context, "all parties" means magistrates, federal judges, three-judge appellate judges, and countless attorneys—who all intentionally ignored **34 C.F.R. 300.154**, in the hopes that Petitioner would one day ***"simply go away"*** and the brilliant and systematic scheme of Exclusion designed to thwart **Title VI** and **I.D.E.A.** could continue to run smoothly—and Federal monies could continue to be quietly siphoned away by greedy States and Municipalities bent on depriving multitudes of innocent persons of Constitutional Rights and other benefits guaranteed by the Federal Government—while myriad intended beneficiaries and or other disabled or minority persons simply fall in the cracks and never come close to realizing their human potential. This describes the level of **"Malice"** that was well acknowledged and employed by the "parties" to this action, and which can be proven, as a matter of fact and law.

Counsel for the Respondents' loose and condescending statement declaring a United States Supreme Court's Opinion vulnerable to mere **"re-phrasing"** is merely another scornful example of the **"Malice"** that has continuously been expressed and employed by all the **"parties"** to

this action, against the interests of the Federal Government and countless intended beneficiaries.

Accordingly, in **Chaplinsky v. New Hampshire**, the Court opined that there exist "certain well-defined and narrowly limited classes of speech [that] are no essential part of any exposition of ideas, and are of such slight social value as a step to truth" such that the government may prevent those utterances and punish those uttering them without raising any constitutional issues.

As the Court has generally applied ***Chaplinsky*** over the past several decades, if speech fell within one of the "well-defined and narrowly limited" categories, it was unprotected, regardless of its effect. (See also: United States v. Alvarez, 567 U.S. ___, No. 11–210, slip op. at 5 (2012) (plurality opinion) ("Absent from those few categories where the law allows content-based regulation of speech is any general exception to the First Amendment for false statements.").

Likewise, random "changing" of U.S. Supreme Court words and phrases is equal to intentional Defamation of that Hallowed Court Body. Because the "rephrasing" of Supreme Court expression, Respondents have proven that the statement was made with 'actual malice'—that is, with knowledge that it was false or with reckless disregard of whether it was false or not." (See: McDonald v. Smith, 472 U.S. 479 (1985).

CONCLUSION

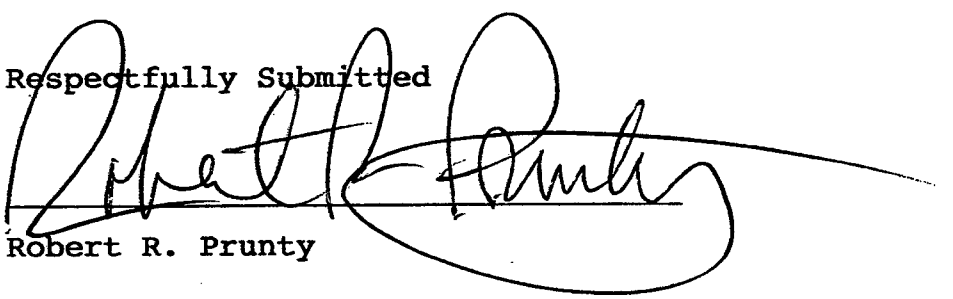
Because Counsel for the Respondents has constantly ignored the main Statute at issue in this Case, **34 C.F.R. 300.154**, and it's Jurisdiction destroying implications which would render Exhaustion futile, a Show Cause Order should be issued to all Respondents to explain to this Honorable United States Supreme Court why they all neglected to mention or acknowledge **34 C.F.R. 300.154**, throughout this litigation, thereby frivolously increasing the costs of such litigation vexatiously in violation of **28 U.S.C. 1927**, and for any other and further relief this Honorable Court deems just and proper.

Respectfully Submitted;

Robert R. Prunty—Petitioner Pro Se'

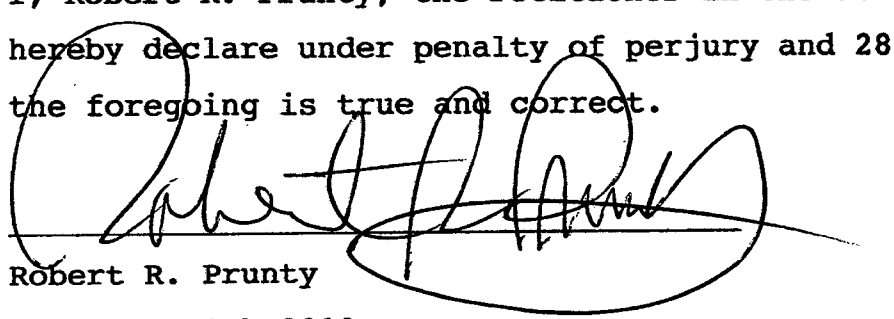
December 13th 2018

Respectfully Submitted



Robert R. Prunty

I, Robert R. Prunty, the Petitioner in the above described case, hereby declare under penalty of perjury and 28 U.S.C. 1746 that the foregoing is true and correct.



Robert R. Prunty

December 13th 2018