

18-7883

IN THE SUPREME COURT OF THE UNITED STATES

FURN-LEE SALOMON,

PETITIONER,

v.

UNITED STATES OF AMERICA,

RESPONDENT,

FILED

FEB 16 2019

OFFICE OF THE CLERK
SUPREME COURT, U.S.

ON PETITION FOR WRIT OF CERTIORARI TO THE
UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT

PETITION FOR WRIT OF CERTIORARI

Mr. Furn-Lee Salomon
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RECEIVED

JAN 24 2019

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SUPREME COURT, U.S.

QUESTIONS PRESENTED

1. WAS TRIAL COUNSEL INEFFECTIVE FOR FAILING TO CONDUCT ANY PRE-TRIAL INVESTIGATIONS TO AT LEAST INTERVIEW POTENTIAL WITNESSES THAT COULD HAVE SUPPORTED PETITIONERS VERSION OF EVENTS, THAT HE DID NOT PARTICIPATE IN THE FATAL ASSAULT ON THE VICTIM?
2. BASED ON THE FACTS SURROUNDING PETITIONERS CAS WAS IT A REASONABLE AND INFORMED STRATEGIC DECISION BY TRIAL COUNSEL NOT TO OBJECT TO TAYLORS HIGHLY PREJUDICIAL AND IRRELEVANT TESTIMONY PERTAINING HOW PETITIONER WAS CUT IN HIS FACE?
3. DID TRIAL COUNSEL MAKE A REASONABLE AND STRATEGIC DECISION TO ALLOW THE PETITIONER TO TESTIFY ABOUT OBTAINING A FRAUDULAENT PASSPORT FROM HAITI TO RETURN TO THE UNITED STATES?
4. DID TRIAL COUNSEL GIVE A REASONABLE JUSTIFICATION AT THE EVIDENTIARY HEARING FOR FAILING TO OBJECT TO ALL OF THE HIGHLY PREJUDICIAL TESTIMONY EVEN AFTER A SIDEBAR WAS CALLED FOR BY THE TRIAL COURT TO ACERTAIN WHY TRIAL COUNSEL FAILED TO MAKE ANY OBJECTIONS?
5. DID TRIAL COUNSEL RENDER DEFICIENT REPRESENTATION WHEN HE FAILED TO PROPERLY PREPARE PETITIONER TO TESTIFY ON HIS OWN BEHALF?
6. DID TRIAL COUNSEL'S CUMULATIVE ERRORS AMOUNT TO PETITIONERS UNCONSTITUTIONAL CONVICTION?
7. DID THE PCR COURT MAKE A REASONABLE FINDING UNDER THE STRICKLAND/FRITZ STANDARD SUPPORTED BY THE EVIDENTIARY HEARING RECORD THAT PETITIONERS TRIAL COUNSEL'S REPRESENTATION SATISFIED THE CONSTITUTIONAL SAFEGUARDS GUARANTEED BY BOTH THE UNITED STATES AND NEW JERSEY CONSTITUTIONS?

LIST OF PARTIES

[X] All Parties appear in the caption of the case on the cover page.

[] All Parties Do Not appear in the caption of the case on the cover page. A list of all Parties to the proceeding in the Court whose judgment is the subject of this petition is as follows:
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APPENDIX A September 21, 2018, United States Court of Appeals, Third Circuit.

APPENDIX B October 24, 2018, SUR PETITION FOR REHEARING.

TABLE OF AUTHORITIES CITED

CASES

Albrecht v. Horn, 485 F.3d 103, (3d Cir 2007)

Brecht v. Abrahamson, 507 U.S. 619 (1993)

Collins v. Sec'y of Pa. Dept. of Corr., 742 F.3d 528, (3d Cir 2014)

Darks v. Mullin, 327 F.3d 1001, (10th Cir. 2003)

Hoots v. Allsbrook, 7885 F.2d 1214, 1220 (4th Cir 1986)

Huddleston v. United States, 485 U.S. 681, (1988)

Keller v. Larkins, 251 F.3d 408, (3d Cir. 2001)

Lesko v. Owens, 881 F.2d 44, (3d Cir 1989)

Lord v. Wood, 184 F.3d 1083, 1093 (9th Cir 1999)

Lambert v. Lord, 528 U.S. 1198, 120 S.Ct. 1262 (2000)

Marshall v. Hendricks, 307 F.3d 36, (3d Cir. 2002)

Saranchak v. Sec'y Pa. Dept. of Corr., 802 F.3d 579, (3d Cir 2015).

United States v. Gray, 878 F.2d 702, (3rd Cir 1989)

United States v. Green, 617 F.3d 233, (3d Cir. 2010)

United States v. Davis, 726 F.3d 434, (3d Cir 2013)

United States v. Himelwright, 42 F.3d 777, 782 (3d Cir. 1994)

United States v. Debango, 780 F.2d 81, 85 (D.C. Cir 1986)

United States ex rel. Hampton v. Leibach, 347 F. 3d 219, 251-253, 255, 260 (7th Cir 2003)

STATUTES AND RULES

2254 (d) (2) and (e) (1)

Fed. R. Evid. 404(b) (1)

Fed. R. Evid. 404(b) (2)

OTHER

IN THE

SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

[X] For cases from federal courts:

The opinion of the U.S. court of appeals appears at **Appendix A**, to the petition and is:

reported at ; or

has been designated for publication but is not yet reported; or

[X] is unpublished.

The opinion of the U.S. District Court appears at **Appendix B**, to the petition and is:

reported at ; or

has been designated for publication but is not yet reported; or

[X] is unpublished.

For cases from State courts:

The opinion of the highest state court to review the merits appears at Appendix to the petition and is:

reported at ; or

has been designated for publication but is not yet reported; or

is unpublished.

The opinion of the Court appears at Appendix to the petition and is:

reported at ; or

has been designated for publication but is not yet reported; or

is unpublished.

JURISDICTION

For cases from federal courts:

The date on which the U.S. Court of Appeals decided my case was **September 21, 2018**.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the U.S. Court of Appeals on the following date: **October 24, 2018**, and a copy of the order denying rehearing appears at Appendix

An extension of time to file the petition for a writ of certiorari was granted to and including (date)
on (date) in Application No. A-

The Jurisdiction of this Court is invoked under 28 U.S.C. 1254(1).

For cases from state courts:

The date on which the highest state court decided my case was . A copy of that decision appears at Appendix

A timely petition for rehearing was thereafter denied on the following date: , and a copy of the order denying rehearing appears at Appendix

An extension of time to file the petition for a writ of certiorari was granted to and including (date)
on (date) in Application No. A-

The Jurisdiction of this Court is invoked under 28 U.S.C. 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Intrinsic challenges to State-Court findings pursuant to the "unreasonable determination" standard, under sections 2254 (d) (2) and (e) (1). This determination is predicated on the State's Courts plainly misapprehend or misstate the record in making its findings.

Pursuant to Fed. R. Evid. 404(b)(1), "evidence of a crime, wrong, or other act is not admissible to prove a person's character in order to show that on a particular occasion the person acted in accordance with the character."

Under the doctrine of cumulative error, habeas relief is appropriate when (1) the individual error involved matters of constitutional dimension rather than mere violations of state laws; (2) the errors were not procedurally defaulted for habeas purpose; (3) the errors so infected the entire trial that the resulting conviction violates due process.

The matters involved include the following issues presented at both the District Court and the Third Circuit Court of Appeals. The Third Circuit has held that the admission of evidence may violate due process where evidence "undermine the fundamental fairness of the entire trial." *Keller v. Larkins*, 251 F.3d 408, 413 (3d Cir. 2001); see also *Lesko v. Owens*, 881 F.2d 44, 51 (3d Cir 1989) ("the erroneous admission of evidence

that is relevant, but excessively inflammatory, might rise to the level of constitutional violation"); Bisacia v. Attorney General of State of New Jersey, 623 F.2d 307, 313 (3d Cir. 1980) (when "the probative value of . . . evidence, thought relevant, is greatly outweighed by the prejudice to the accused from its admission, then use of such evidence by a state may rise to the posture of fundamental fairness and due process of law").

Pursuant to Fed. R. Evid. 404(b)(1), "evidence of a crime, wrong, or other act is not admissible to prove a person's character in order to show that on a particular occasion the person acted in accordance with the character." Such evidence may be admissible for another relevant purpose, "such as proving motive, opportunity, intent, preparation, plan knowledge, identity, absence of mistake, or lack of accident." Fed. R. Evid. 404(b)(2). Parties may not introduce "evidence of extrinsic acts that might adversely reflect on the actor's character, unless that evidence bears upon a relevant issue in the case such as motive, opportunity or knowledge." Huddleston v. United States, 485 U.S. 681, 685 (1988). As noted above, "one proper purpose under 404(b) is supplying helpful background information to the factfinder." United States v. Green, 617 F.3d 233, 250 (3d Cir. 2010). Under Rule 404(b), "prior act evidence is admissible only if it is (1) offered for a proper purpose

under Rule 404(b)(2); (2) relevant to that purpose; (3) sufficiently probative under the Rule 403 balancing requirement, and (4) be accompanied by a limiting instruction, if requested." *United States v. Davis*, 726 F.3d 434, 441 (3d Cir 2013). The proffered evidence must fit "into a chain of logical inferences, no link of which may be the inference that the defendant has the propensity to commit the crime charged." *United States v. Himelwright*, 42 F.3d 777, 782 (3d Cir. 1994).

"Under the doctrine of cumulative error, habeas relief is appropriate when: (1) the individual error involved matters of constitutional dimension rather than mere violations of state law; (2) the errors were not procedurally defaulted for habeas purpose; (3) the errors so infected the entire trial that the resulting conviction violates due process."

The Third Circuit Court of Appeals has stated that the cumulative error doctrine "allows a petitioner to present a standalone claim asserting the cumulative effect of errors at trial that so undermined the verdict as to constitute a denial of his constitutional right to due process." *Collins v. Sec'y of Pa. Dept. of Corr.*, 742 F.3d 528, 542 (3d Cir 2014). The Third Circuit has also recognized that "errors that individually do not warrant habeas relief may do so when combined." *Albrecht v. Horn*, 485 F.3d 103, 139 (3d Cir 2007) (citing *Marshall v. Hendricks*, 307 F.3d 36, 94 (3d Cir. 2002)). Cumulative errors

warrant habeas relief "if they had a substantial and injurious effect or influence in determining the jury's verdict." Id. (citing *Brecht v. Abrahamson*, 507 U.S. 619 (1993)). When performing a cumulative analysis, a court "aggregates all the errors that individually have been found to be harmless, and therefore not reversible, and it analyses whether their cumulative effect in the outcome of the trial is such that collectively they can no longer be determined to be harmless." Id. (quoting *Darks v. Mullin*, 327 F.3d 1001, 1018 (10th Cir. 2003)). While petitioner understands that our Court of Appeals has not resolved whether cumulative error claims "constitute clearly established federal law as determined by the Supreme Court for purposes of deference under ADEPA," a de novo review should be conducted to evaluate the fundamental fairness and due process rights of petitioner's trial. *Saranchak v. Sec'y Pa. Dept. of Corr.*, 802 F.3d 579, 590 (3d Cir 2015).

The record developed at Petitioner's evidentiary hearing failed to support the findings of the PCR court's ruling that trial counsel made strategic and tactical decision not to investigate any of the witnesses scheduled to testify for the State. Moreover, trial counsel's overall performance throughout Petitioner's trial constitutes ineffective assistance of counsel guaranteed by the Sixth Amendment depriving his right to a fair

trial. The following testimony from trial counsel was evaluated by the PCR court:

TRIAL COUNSEL'S TESTIMONY DURING THE PCR HEARING

In terms of trial strategy, Trial counsel testified during Petitioner's evidentiary hearing to the following:

PCR counsel: Did you review with him your plan strategy?

Trial counsel: yes.

PCR counsel: And what was that?

Trial Counsel: Like I told him that I felt that the strongest defense in this case was a causation argument because there was an issue as to whether the trauma suffered by Mr. Brown during the fight or attack was actually a - - cause of his death. There were many witnesses who placed my client at the scene and said that he was involved in striking Mr. Brown with a bicycle and other object. So I thought that the - - the other avenue was the best line of defense although obviously we would pursue the opportunity to discredit the state's witnesses who claimed that - - that Mr. Solomon participated in the attack..

PCR counsel: Did you review with my client the possibility of testifying on his own behalf?

Trial counsel: I don't remember. You mean at the time I visited him in prison?

PCR counsel: During any of these pretrial reviews?

Trial Counsel: I'm sure that we must have discussed it at some point but I don't recall.

PCR counsel: Do you recall ever having any type of preparation session with my client on how to provide testimony?

Trial counsel: Again, I have no specific recollection of discussing that particular issue, just as I have no particular recollection of discussing any issue with him. I -- all I know is that I did meet with him and I don't remember what happened at any particular meeting you know seven years ago.

PCR counsel: Do you recall meeting with my client during trial and jointly making the decision that he would testify?

Trial counsel: I recall that he decided to testify, that he wanted to testify, yes. I don't remember that being a joint decision. I don't -- let me put it this way, in probably 140 or 50 jury trials that I have handled over the years, I think that I have maybe recommended that the client testify in a handful of them. So I don't remember if I agreed with that decision or not. I don't know. [9T13-20 to 15-11].

In terms of investigations done to prepare for trial, Trial counsel testified to the following:

PCR counsel: You are aware, you do recall that there were a great number of witnesses and potential witnesses in this case? Trial counsel: Yes.

PCR counsel: Can you explain why you made no request for investigations in this matter until during trial it was requested to talk to one witness?

Trial counsel: During trial -- oh, okay. Why did I not request that an investigator talk to witnesses?

PCR counsel: Yes.

Trial Counsel: All of the witnesses that I was familiar with I considered to be witnesses for the state. All had given multiple statements in which they implicated my client, and I didn't think there was any likelihood that they were going to change their version of events. And that even if they did that they would be - - that they had already given detailed statements to the police in which they said that he was in - involved. So I did not think it would be helpful to use them as witnesses. That was my opinion.

PCR counsel: Well, answer me this, what harm could it have done?

Prosecutor: Judge, I - - I'm restraining myself from objecting but that's really not why we're here to determine what harm there could have been. The issue is was counsel ineffective because he failed to do specific things.

PCR court: I agree that what harm would it have done question is of limited value but go ahead, you can answer it.

Trial counsel: I don't know.

PCR counsel: did you ever go to the scene or by the scene, drive - -

Trial counsel: Yes.

PCR counsel: Okay. Did you ever have photographs taken of the scene?

Trial counsel: I did not. [9T16-14 to 18-1].

PCR counsel: You didn't see that as being prejudicial?

Trial counsel: See what as being prejudicial? The fact that she said that he had a bandage. Everybody knew that.

PCR counsel: No. Actually she said more than that. Isn't that correct? That he had gotten cut my some guy after beating up his girlfriend?

PCR counsel: Yeah. she did say that.

The Court: I'm sorry, say that again please?

PCR counsel: She testified that my client had gotten his face cut after beating up another guy's girlfriend?

Trial counsel: She also said that she thought that he told her that to impress her. I thought that that made -- I mean it absolutely made no sense that someone would go up to this girl, start a conversation with her, try to impress her by saying, see, I got cut because I beat somebody -- I beat up a -- a - another -- a woman. It's basically to me was an example of the fact that you know she was related to the victim. Okay. And she -- her -- all of her testimony was prejudicial and incredible.

PCR counsel: so --

Trial counsel: Mr. Solomon told me that he had never seen her before in his life until the day she walked into the courtroom.

PCR counsel: So it was your strategy that she would be so tremendously prejudicial as to become unbelievable?

PCR counsel: I think she was in -- I -- I think that her testimony was -- she was obviously prejudiced since she was the victim's niece and that her testimony was not credible not only because she was prejudiced but also because of the fact that

the statements that she -- what she said made no sense.

Trial Court: What about her testimony didn't make sense?

Trial counsel: The fact that she claimed that Mr. -- that she saw Mr. Solomon in this chicken restaurant, that he started a conversation with her out of the blue and say -- said see what happened to my face, I got cut because I beat up somebody's girlfriend. Why would you tell a strange woman that especially if you're to impress her, or hit on her, or whatever. That -- that -- why would you tell somebody -- that would be akin to going on a date and saying by the way, I have a restraining order you know, my ex-wife has a restraining order against me or you know I -- I -- it just made no sense. You don't --

Trial Court: Are you saying strategically you thought that was helpful to you the jury hearing that?

Trial counsel: Because it was so unbelievable I think it -- my argument would be that all of her -- testimony -- none of her testimony should be believed because she was so -- she had lost her uncle in this traumatic way, she was out to get the people who she thought was -- were responsible. And I mean Mr. -- as I said Mr. Solomon said he had never seen this woman in his life until she testified in court. And I had no reason not to believe that that was true.

PCR counsel: But isn't this all hindsight at the time because you didn't know what she was going to say when she started talking about the night before, correct?

Trial counsel: All I knew was basically what I had prepared you know reading her previous statement.

PCR counsel: And her previous statement talked about the cut to the face and my cl-- and Mr. Solomon beating up a girl?

Trial counsel: I -- I -- I simply don't remember. I don't know. PCR counsel: But so as she started to talk about the previous day, what had happened, you don't recall whether you anticipated that answer or not?

The Court: Wait. Are you asking him does he recall that as he sits here today or are you asking him to go back and asking him what his state of mind was during the trial?

PCR counsel: I'm interested in the state of mind at -- at the time of the trial. Do you recall whether you could anticipate what she was going to say?

Trial counsel: I am trying my best to piece together what I think my thought process might have been. This is nine years ago. I have no specific recollection as I sit here today as to what I was thinking at the time. And I do not recall what was in her previous statement.

PCR counsel: Do you recall having an opportunity, the judge bringing you to sidebar and asking you specifically and if you -- you don't recall then I would ask you to look at page 69?

The Court: Say it again, please? The page number?

PCR counsel: Because Your Honor had the attorneys at sidebar.

The Court: What page? I just said what page?

Trial Counsel: Page 69 I see, yes. I -- I see that. I'm on page 69.

The Court: Thank you.

PCR counsel: Do you recall the Judge asking you basically you -- you didn't object to the testimony about how your client got the scar on his face. I assume that was a conscious, tactful decision that you did not wish. I'm giving time to make any application to strike or cure. My response was not at all. The Judge said that is based on a tactical decision you discussed with your client and I said yes.

PCR counsel: You said yes that you had discussed that with your client, right?

Trial counsel: That's what I said at the time.

PCR counsel: When did you ever have that opportunity to discuss it with him?

Trial counsel: I have no -- I don't know. I don't remember. I mean I had many opportunities to discuss it with him. I don't remember whether I discussed it with him or not.

PCR counsel: Well, you couldn't have discussed an unanticipated statement prior to the statement, correct?

Trial counsel: Well, I knew that if she testified she was going to talk about the conversation that she claimed that she had. Yes. And if I said that I had discussed it with my client, then I discussed it with my client.

PCR counsel: So you're saying this statement that she made was included or had to have been included in some of her statements to the police or to the prosecutor's office?

Trial counsel: I assume so. I don't recall

Trial counsel's reasoning for allowing Taylor's prejudicial testimony was objectively unreasonable and had the potential to

turn the jury against the Petitioner. Taylor provided a total of three statements. On September 5, 1996, on the night of the incident, Ms. Taylor gave two statements. Taylor gave a subsequent statement on September 10. 1996. Taylor indicated that a total of eight people participated in the attack against her uncle.

Taylor's first statement claimed that two days prior to her uncle's attack, her mother was assaulted by the "Haitian guy with the patch on his face." When or how did Taylor's mother tell her that she was assaulted by presumably, the petitioner. That made Taylor a biased witness, who may have picked Petitioner's picture because Taylor believed that Petitioner assaulted her mother a day before she claimed that Petitioner told her that he was cut in the face for beating a guy's girlfriend one day after the assault of her mother and one day before the assault that led to her uncle's death.

Petitioner suffered severely due to the lack of investigation on the part of trial counsel. Although trial counsel indicated that his decision to allow Taylor's prejudicial but incredible testimony was unbelievable, the jury did not hear any other evidence that would disprove Taylor's testimony, other than Petitioner's testimony.

STATEMENT OF THE CASE

Petitioner suffered from his trial counsel's unprofessional and ineffective practice of failing to prepare for trial. Trial counsel knew well in advance that Petitioner was scheduled for trial. Trial counsel had discovery documents in his possession and made no attempt to conduct any independent investigation to support Petitioner's position that although he was at the scene of the incident, he did not participate in the attack that led to the victim's death. Numerous people on the scene of the crime were noted in the police reports provided in discovery. Trial counsel knew in advance that Petitioner intended to testify on his own behalf well before trial commenced.

Trial counsel instead decided to with a defense of causation that the victim died from a preconditioned berry aneurysm. The defense had an expert witness testify on behalf of the defense that the victim's personal activities involving drug use and alcohol likely caused his death but could not rule out that the attack is what led to the victim's death.

This line of defense did nothing to exclude Petitioner from the attack. There were different accounts of what actually happened which supported that the Petitioner attempted to intervene and stop the altercation before it got physical. There were two recantations from codefendants, who received favorable deals to implicate the Petitioner in the deadly assault. Trial counsel did not interview any of the potential witnesses for either the State nor did he interview any potential witnesses, despite the fact that Petitioner gave him names of individuals who were present and had direct knowledge that he did not participate in the vicious beating that resulted in the victim's death.

Trial counsel failed to prepare for Petitioner to take the stand and present his version of the events. The State was able to elicit damaging information from Petitioner that had no bearing on the case before the jury. The jury was exposed to extraneous information that prejudice the Petitioner from a fair trial.

Petitioner was granted an evidentiary during his PCR proceedings in which his trial counsel was called in to testify to the claims of ineffectiveness of his performance during Petitioner's trial. Trial counsel's testimony supported that he did not attempted to investigate, interview witnesses and could not remember whether he prepared Petitioner to take the stand. The existing record did not support the State court's ruling that trial counsel was effective and made strategic decisions during the course of Petitioner's trial. Therefore, the Third Circuit Court of Appeals decision was unreasonable in light of the state court's record. Thus, an intrinsic review of this matter was not reasonably conducted. Therefore, this matter should be granted because the trial counsel's unprofessionalism cannot be classified as strategic and reasonable.

REASONS FOR GRANTING THE PETITION

The State and Federal courts have steadfastly recognized that "ineffectiveness is generally clear in the context of complete failure to investigate because counsel can hardly be said to have made a strategic choice against pursuing a certain line of investigation when s/he has not yet obtained the facts on which such a decision could be made." United States v. Gray, 878 F.2d 702, 711 (3rd Cir 1989). Hence, "the complete failure to investigate potentially corroborating witnesses" cannot be attributed to trial strategy. United States v. Debango, 780 F.2d

81, 85 (D.C. Cir 1986); United States ex rel. Hampton v. Leibach, 347 F. 3d 219, 251-253, 255, 260 (7th Cir 2003) (affirming grant of habeas on ineffective assistance grounds because counsel acted objectively unreasonably in failing to contact witnesses whose names defendant provided, and failing to make an effort to locate other eyewitnesses); Lord v. Wood, 184 F.3d 1083, 1093 (9th Cir 1999) (holding that failure to conduct more than "cursory investigation" of three potential witnesses, and to call them to stand, "constitutes deficient performance by counsel prejudicing defendant), cert. denied sub nom. Lambert v. Lord, 528 U.S. 1198, 120 S.Ct. 1262 (2000); Hoots v. Allsbrook, 7885 F.2d 1214, 1220 (4th Cir 1986) ("Neglect even to interview available eyewitnesses to a crime simply cannot be ascribed to trial strategy and tactics"). In sum, to be entitled to deference, a decision not to pursue a particular line of investigation must be based on reason, not dereliction of duty.

This case presents an issue of general importance pertaining to the degree of deference that should be afforded to a trial attorney's uninformed decision not to investigate and prepare a viable defense for trial, therefore, Petitioner was deprived a fair trial and should be remanded back to the District Court with instructions to issue habeas corpus relief.

CONCLUSION

The Petition for a Writ of Certiorari should be granted.

Respectfully submitted,

Furn-Lee Salomon

Date: January 16, 2019

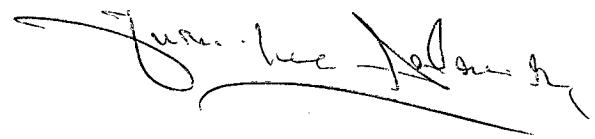
No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

FURN-LEE SALOMON-PETITIONER,

v.

Furn-Lee Salomon



A handwritten signature in black ink, appearing to read "Furn-Lee Salomon". The signature is fluid and cursive, with the first name "Furn-Lee" on the top line and the last name "Salomon" on the bottom line.