

NO. _____

IN THE
SUPREME COURT OF THE UNITED STATES

NATALIE ANGELES

Petitioner,

v.

UNITED STATES OF AMERICA

Respondent.

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

PETITION FOR A WRIT OF CERTIORARI

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QUESTION PRESENTED

Does a district court coerce the Defendant to withdraw her objections to findings in the Presentence Report where the court informs the Defendant that those objections may lead to the denial of acceptance of responsibility points? Relatedly, should such judicial coercion be treated as a structural error immune from harm analysis?

PARTIES TO THE PROCEEDINGS

Natalie Angeles the Petitioner, who was the defendant-appellant below.

The United States of America is the Respondent, who was the plaintiff-appellee below.

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PETITION FOR A WRIT OF CERTIORARI

Petitioner, Natalie Angeles, respectfully petitions for a writ of *certiorari* to review the judgment of the United States Court of Appeals for the Fifth Circuit.

OPINION BELOW

The published opinion of the United States Court of Appeals for the Fifth Circuit is captioned as *United States of America v. Natalie Angeles, also known as Natalie Deschamps*, __ __ F.3d. __ __, 2020 WL 4931649(5th Cir. Aug. 24, 2020), and is provided in the Appendix to the Petition. [Appendix A]. The judgment of conviction and sentence was entered August 16, 2019 and is also provided in the Appendix to the Petition. [Appendix B].

JURISDICTIONAL STATEMENT

The judgment and opinion of the United States Court of Appeals for the Fifth Circuit were filed on August 24, 2020. [Appendix A]. This Court's jurisdiction is invoked under 28 U.S.C. § 1254(1).

STATEMENT OF THE CASE

A. Proceedings Below

On January 16, 2019, Defendant-Appellant Natalie Angeles (“Ms. Angeles” or “Appellant”) was charged by indictment with conspiracy to possess with intent to distribute a controlled substance. [ROA.7]; *see* 21 U.S.C. §§ 841(a) (1), (b) (1) (B); 846.

On April 5, 2019, Ms. Angeles entered her plea of guilty before the Honorable John McBryde to the offenses set forth in the indictment. [ROA.118]. On August 16, 2019, Ms. Angeles was sentenced by the district court to a term incarceration of 280 months. [ROA.145]. Ms. Angeles filed timely notice of appeal on August 21, 2019. [ROA.76].

B. *Statement of the Facts*

On January 16, 2019, Ms. Angeles was charged by indictment with conspiracy to possess with intent to distribute a controlled substance. [ROA.7]. Pursuant to the Factual Resume filed on April 5, 2019, Ms. Angeles admitted her willful participation in a conspiracy to distribute methamphetamine. [ROA.49]. On April 5, 2019, in demonstration of her acceptance of responsibility for her conduct, Ms. Angeles entered her plea of guilty before the Honorable John McBryde to the offenses set forth in the indictment. [ROA.118].

The government, fully aware that Ms. Angeles timely accepted

responsibility for her actions, filed its Notice Regarding Acceptance of Responsibility on April 8, 2019, formally notifying the court of its position that Ms. Angeles was entitled to a downward adjustment for acceptance of responsibility under § 3E1.1(b) of the sentencing guidelines. [ROA.55].

The Probation Officer prepared and submitted Ms. Angeles' Presentence Investigation Report ("PSR") to the parties and the court on June 3, 2019. [ROA.154]. Consistent with her early guilty pleas, the PSR recommended that Ms. Angeles receive a two-level downward adjustment under § 3E1.1(b) of the Guidelines for readily and clearly acknowledging her guilt. [ROA.161]. Echoing the government's position regarding acceptance of responsibility, the PSR further recommended that Ms. Angeles receive the third point of downward adjustment under § 3E1.1(b) for timely accepting responsibility. [ROA.161].

As with any other conspiracy to distribute methamphetamine case, the PSR calculated the amount of narcotics for which Ms. Angeles could be held responsible for. Further, the PSR increased Ms. Angeles' recommended Guidelines calculation by: (1) two levels under § 2D1.1(b)(5) because the offense purportedly involved the importation of methamphetamine; (2) two levels under § 2D1.1(b)(12) on the grounds that Ms. Angeles purportedly maintained a premises for the purpose of manufacturing or distributing a controlled substance; and (3) two levels under § 3B1.1(c) for her purported role

in the offense as an organizer, leader, manager or supervisor. [ROA.160-61].

On July 15, 2019, Ms. Angeles made a number of substantive objections to the PSR. Specifically, she objected: (1) to various paragraphs which accused her of performing certain leadership roles in the offense; (2) certain paragraphs outlining methamphetamine transaction for which Ms. Angeles should not be held responsible for; (3) the two-level increase in her offense level grounded in the importation of methamphetamine based on the lack of evidence to support same; (4) the two-level increaser in her offense level grounded in the allegation that she kept a residence for the manufacturing or distribution of methamphetamine, due to the fact that many of the transactions took place away from her California residence; (5) the two-level increase in her offense level; and (6) the failure of the PSR to recommend a four-level decrease in her offense level based on her minimal / minor role in the offense.¹ [ROA.264-68].

The Addendum to the PSR (the “Addendum”) submitted on July 29, 2019, rejected the totality of Ms. Angeles’ objections. [ROA.238-40]. Further, the Addendum noted that as result of Ms. Angeles’ objections to what the probation officer considered to be relevant conduct, the Addendum provisionally redacted the three point reduction in offense level on the grounds that Ms. Angeles was

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Ms. Angeles also objected that as a consequence to the foregoing objections, the PSR’s total offense level was equally inflated. [ROA.270].

not acting in a manner consistent with the acceptance of responsibility.² [ROA.240-41]. By supplemental filing submitted on August 12, 2019, Ms. Angeles withdrew her objection to the two-level increase grounded on the importation of methamphetamine. [ROA.278].

After Ms. Angeles filed her supplemental pleading on August 12, 2019, the court issued an order on August 15, 2019. [ROA.66]. In that order, the court tentatively, and without hearing, ruled that Angeles' remaining objections were without merit and that she would not receive credit for acceptance of responsibility at sentencing. [ROA.66]. As shown by the record, the court came to this tentative conclusion despite the fact that Angeles had entered a plea of guilty; admitted that the facts set forth in the Factual Resume were true and that he was guilty of the charged offenses; assisted authorities in the investigation and prosecution of own misconduct by timely notifying authorities of his intention to enter a guilty plea, and had done nothing in this case—other than lodging good faith objections—that was inconsistent in any way with accepting responsibility for her conduct. The order concluded with the implication-laden warning to Angeles that, “[the parties should take such tentative conclusions into account in making decisions as to what presentations to make at the

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The Addendum also included a new paragraph setting forth potential grounds for a downward departure or variance grounded in Ms. Angeles' lack of significant criminal history and certain facts relating to her childhood and upbringing. [ROA.242].

sentencing hearing.” [ROA.66-67].

Prior to the August 15 order, as stated above, Angeles had withdrawn her objection to the two-level importation increase. Indeed, absent the difference between the drug quantity amount agreed to by the government and Angeles in the Factual Resume and the amount alleged in the PSR and Addendum, all of Angeles’ remaining objections were purely legal objections.

At the sentencing hearing, the following dialogue occurred:

THE COURT: Okay. There were a number of objections to the presentence report. You've seen the government's response to those objections, the probation officer's response to the objections, and then the government's response to my order requiring the government to give specific information relative to its response and my order expressing my tentative conclusion that the objections are without merit. And I have a note that you filed a document on behalf of your client, Ms. Lederman, abandoning or withdrawing one of the objections, the one having to do with the two level increase for the importation of methamphetamine from Mexico. Do you still want to pursue any of the other objections?

MS. LEDERMAN: Judge, we just stand on the filings at this time.

THE COURT: Pardon?

MS. LEDERMAN: At this time we would just stay with our written objections.

THE COURT: Well, if you're pursuing them, we're going to have to deal with each one of them individually. I'm trying to find out if there are any that you're not pursuing at this time.

MS. LEDERMAN: At this time the only one we would still pursue would be the—and I don't want my client punished for my advocacy, but the only one that I think still—if the judge felt that we needed to have a hearing but I don't feel we do—would be the premises, but other than that we will just go on your ruling from the other day.

THE COURT: I haven't made a ruling. I simply told you what my tentative thought was, and if you're not withdrawing all of the objections, then we're going to have to consider those as having

been withdrawn. I'm trying to find out if you are withdrawing more than just the one having to do with importation from Mexico.

MS. LEDERMAN: At this time we would ask just for the continued ruling on the premises.

THE COURT: That's the only objection that you're wishing to maintain at this time?

MS. LEDERMAN: And the--yes, at this time.

THE COURT: Well, I'm the one who says at this time. There won't be another time. So tell me which objection your client wishes to pursue.

MS. LEDERMAN: Can I have one moment to consult with her?

THE COURT: Yes.

(Brief pause in proceedings)

MS. LEDERMAN: At this time my client is indicating that she is withdrawing her objections.

THE COURT: Withdrawing all objections?

MS. LEDERMAN: Yes.

THE COURT: Okay. Is that your wish, Ms. Angeles, that all objections be withdrawn?

DEFENDANT ANGELES: Yes, Your Honor.

[ROA.128-130].

The trial court ultimately allowed Ms. Angeles to retain her acceptance of responsibility points. [ROA.135].

At that sentencing hearing, the district court accepted the offense computations set forth in the PSR. [ROA.135-136]. Those computations resulted in a base offense level of 38, as Ms. Angeles was found responsible for the equivalent of 749,800 kilograms of converted drug weight. [ROA.160].

There were also three guideline enhancements. Two levels were added due to the importation of the methamphetamine from Mexico. [ROA.160]; *See*

U.S.S.G. §2D1.1(b)(5). Two level were added because Ms. Angeles maintained a premises for the purpose of manufacturing or distributing a controlled substance. [ROA.160]; *See* U.S.S.G. §2D1.1(b)(12). Finally, two levels were added because Ms. Angeles was an organizer, leader, manager or supervisor in the conspiracy. [ROA.161]; *See* U.S.S.G. §3B1.1(c). The resulting adjusted offense level of 44 was calculated; three levels were then subtracted based on Ms. Angeles' acceptance of responsibility for the offense. [ROA.161]; *See* U.S.S.G. §§3E1.1(a), (b). Her total offense level was calculated to be 41. [ROA.161].

Ms. Angeles' limited criminal history resulted in one criminal history points, which correctly established a criminal history category of I. [ROA.162]; *See* U.S.S.G. Ch. 5, Pt. A. Ms. Angeles' offense level of 41 indexed with a criminal history category of I resulted in a guideline range of 325 to 405 months. [ROA.135]. Ms. Angeles was sentenced by the district court to a term incarceration of 280 months, which was somewhat below the advisory guideline range. [ROA.145].

C. The Appeal

Petitioner appealed to the United States Court of Appeals for the Fifth Circuit, contending in a single point that the district court had coerced her into waiving all of her objections to the PSR by threatening to deny her the three

acceptance of responsibility points she had earned by entering a timely guilty plea. The court of appeals rejected this claim, holding that the district court did no coerce her into waiving her PSR objections. *Angeles*, ___ F.3d ___, 2020 WL 4931649, at *3 (holding “the [district] court nonetheless examined whether the objections showed she had ‘frivolously contest[ed] or falsely denie[d] relevant conduct.’ This was directly relevant to whether Angeles had ‘clearly demonstrate[d] acceptance of responsibility for [her] offense.’”

REASON FOR GRANTING THE PETITION

The courts are required to be fair and impartial in sentencing a defendant. The court's actions in this case fell short of that required standard. Similar to a judicially-induced plea agreement, where a judge explicitly or implicitly threatens a defendant with a lengthier sentence unless a plea is accepted, the court here effectively induced Angeles to withdraw all of her objections to the Probation Officer's reports, under the threat that her failure to do so would result in being stripped of the acceptance of responsibility adjustment. Indeed, Ms. Angeles, at the court's urging and due to its clear warning in the August 15 order, waived all objections to the PSR and Addendum.

The court's clear warning that Ms. Angeles risked losing the acceptance of responsibility adjustment if she merely exercised her rights under the Federal Rules of Criminal Procedure and persisted in her objections at sentencing amounted to judicial coercion that denied Ms. Angeles her right to a fair sentencing.

A. *Standard of Review*

The standard of review for fundamental issues such as the one present in this case is structural error. *United States v. Mudekunya*, 646 F.3d 281, 291 (5th Cir. 2011). Some errors are so fundamental that they affect the entire process, undermining its structural integrity, e.g., the right to counsel, a coerced

confession, or a biased judge. *Id.*

Errors such as these require automatic reversal, regardless of whether or not the error can be shown to have affected a substantial right or whether the error was properly preserved. *Id.*; see also *United States v. Gonzalez-Terrazas*, 529 F.3d 293, 299 (5th Cir. 2008) (holding that the imposition of a sentence that was substantially greater than the Guidelines range affected the defendant's substantial rights and the fairness of the judicial proceedings).

B. *Discussion*

The legal system is based on the principle that an independent, fair and competent judiciary will interpret and apply the law. Indeed, the purpose of the judiciary is to apply concepts of justice and rules of law. MODEL CODE OF JUDICIAL CONDUCT, at p. 1. (2007).

Judicial coercion most frequently occurs in the context of plea bargaining. This type of judicial coercion is exemplified in *Longoval v. Meachum*, 693 F.2d 236, 237 (1st Cir. 1982). In that case, the trial court informed the defendant that if he did not plead guilty, it “might be disposed to impose a substantial sentence” if convicted. After the defendant refused to plead guilty and went to trial, the court sentenced him to forty to fifty years in prison (reduced on appeal) instead of the three year sentence his co-defendant received. *Id.* at 238. On appeal, the

First Circuit admonished the trial court for the coercive tactic: “[a] judge, however, is expected to be impartial, and to appear impartial. It is difficult to reconcile with impartiality a forceful recommendation to consider pleading, ending on a note of the judge's power to impose a substantial sentence if not complied with.” *Id.*

The Second Circuit reached a similar conclusion in *United States ex. rel. McGrath v. LaValle*, 319 F.2d 308 (2d Cir. 1963). In *McGrath*, the defendant accepted a plea after an off the record conference where it was alleged that the trial court told him that he did not have a chance at trial and that if convicted, he would never see the sunshine again. *Id.* at 309. The Second Circuit reversed the court and remanded the case for a hearing, holding that a plea induced by promises or threats is inconsistent with the due process of law. *Id.* at 311. If the plea was the product of coercion, either mental or physical, or was unfairly obtained or given through ignorance, fear or inadvertence the judgment of conviction which rests upon it is void ...” *Id.* (quoting *Kercheval v. United States*, 274 U.S. 220, 224, 47 S.Ct. 582 (1927)).

In reviewing the record for judicial coercion, a key factor is not whether the judge’s statements were deliberately designed or intended to influence or induce the defendant to act; the question instead is whether the statements in

fact had that impact on the defendant. *United States v. Gilligan*, 256 F. Supp. 244, 253 (S.D. NY. 1966). Indeed, the Supreme Court has stated that interference with a defendant's due process can be found in the form of ignorance, incomprehension, coercion, terror, inducements, subtle or blatant threats. *Boykin v. Alabama*, 395 U.S. 238, 242-43, 89 S.Ct. 1709 (1969), *superseded by statute*, FED. R. CRIM. P. 11(c).³

In this regard, the Fifth Circuit vacated a guilty plea when the trial court, before accepting a guilty plea, directed the defendant to resolve an unrelated civil matter before entering his plea. *United States v. Pena*, No. 11-50482, 2013 WL 3013870, (5th Cir. June 13, 2013) (unpublished). The Fifth Circuit vacated the plea despite the judge's almost immediate attempt to rectify the error by informing the parties the next day that he changed his mind regarding the need to resolve the civil matter before the court would accept the plea. *Id.*

The Fifth Circuit also reversed a conviction where the trial court more subtly coerced the defendant into entering a guilty plea. In *Rodriguez*, 197 F.3d

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In fact, Rule 11(c)(1) of the Federal Rules of Criminal Procedure states that the court must not participate in plea discussions. FED. R. CRIM. P. 11(c)(1). The purpose of this rule is to diminish the possibility of judicial coercion of a guilty plea, regardless of whether the coercion would cause an involuntary, unconstitutional plea. *United States v. Miles*, 10 F.3d 1135, 1139 (5th Cir. 1993). Pressure would be inherent by any involvement by a judge in a plea negotiation process. *United States v. Rodriguez*, 197 F.3d 156, 159 (5th Cir. 1999). Further, participation in plea discussions creates a misleading impression of the judge's role. *Miles*, 10 F.3d at 1139.

at 158, the district court informed the defendant that if he did not accept a plea and was convicted, he would be sentenced under a ten-year minimum as opposed to a five-year minimum. *Id.* The judge expressed his subtle desire that the defendant enter a guilty plea by asking the defendant if he was “sure [he] want[ed] to do that” when the defendant indicated he would go to trial. *Id.* The Fifth Circuit again vacated the plea, holding that the district court clearly desired the defendant to accept the plea because the court’s statements exerted pressure on the defendant to accept the plea. *Id.* at 159.

In this case, the district court’s actions caused Ms. Angeles to withdraw, under improper pressure, good faith objections to the PSR. In a word, the court overstepped its proper role in the sentencing process by effectively coercing Ms. Angeles into surrendering her legal right to make good faith objections to the PSR and Addendum at the hazard, if he did not withdraw those objections, of losing the adjustment for acceptance of responsibility to which all participants in his sentencing agreed he was entitled.

Analogous to the judge in *Longoval*, the court threatened Ms. Angeles with the loss of a three-level downward adjustment if she did not do what the court wanted, namely, withdraw a limited number of substantive objections that it deemed frivolous before it even heard evidence or argument on any of them. This threat was made plain by the August 15, 2019, order, in which the court,

inter alia, expressly stated that Ms. Angeles should consider its “tentative conclusions” including that Ms. Angeles’ relevant conduct objections were frivolous and merited loss of acceptance in deciding whether he would persist in any of those objections at sentencing. A clearer linkage between merely persisting in his objections and losing acceptance of responsibility credit is difficult to imagine. This is no less coercive than the strong-armed conduct that the First Circuit found objectionable. In *Longoval*, the trial court in essence told the defendant that if he did not plead guilty, he faced a substantially longer sentence. *Longoval*, 693 F.2d at 237. Similarly, the court here effectively told Ms. Angeles that if she did not withdraw her objections at sentencing (stated as, “[t]he parties should take such tentative conclusions [including that Ms. Angeles should not receive the acceptance of responsibility adjustment] into account in making decisions as to what presentations to make at the sentencing hearing.”), she too faced a longer sentence, albeit through the loss of credit for acceptance. This led to Ms. Angeles’ coerced withdrawal of her sentencing objections to avoid the threatened penalty of losing acceptance under § 3E1.1. This amounted to judicial coercion and, as structural error, warrants the reversal of the sentence in this case.

Importantly, the district court’s subjective intent is not the critical issue in deciding whether judicial coercion has occurred. *Gilligan*, 256 F. Supp. at 253.

Instead, the issue is whether the defendant was, in fact, coerced to act based on the judicial pressure imposed on him. *Id.* (vacating a guilty plea because the trial court's coercive statements exerted pressure on the defendant to accept the plea).

Here, regardless of the court's intent, it is clear that Ms. Angeles was coerced into withdrawing her objections to the PSR and Addendum. Through the August 15 order, Ms. Angeles' receipt of the Section 3E1.1 acceptance of responsibility adjustment was clearly linked to whether she persisted in or withdrew her objections. Indeed, she knew from the order that based on those exact objections alone, the court had tentatively concluded that she should lose the acceptance adjustment.

However, Ms. Angeles also explicitly knew from that order that the court's tentative conclusion could be influenced by her upcoming "decisions as to what presentations" she would make at sentencing. The linkage—and options—could be not more clear: Ms. Angeles could (1) maintain her objections at sentencing, and consequently lose the reduction for acceptance of responsibility, or (2) withdraw her objections, and presumably cause the court to rescind its tentative conclusion that she should lose the acceptance of responsibility adjustment. Under these circumstances, Ms. Angeles was clearly pressured into withdrawing her objections, and accordingly improperly coerced.

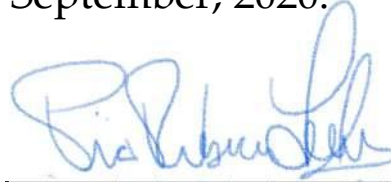
This case is no different from that of a coerced plea bargain. Here, the district court effectively threatened a longer sentence if Ms. Angeles did not take actions consistent with its tentative conclusions. In the plea bargaining context, improper judicial pressure is exerted when the court coerces a defendant to accept a plea. Here, improper pressure was exerted on Ms. Angeles when the court informed her of its conclusion that it likely would take away acceptance if she did not waive her objections. In either circumstance, the defendant is improperly coerced by judicially-imposed pressure.

Courts should take strong measures to ensure that the balance is never weighed against the defendant. Indeed, the court should never be instrumental in causing the balance to be shifted against the accused or, as here, a convicted defendant awaiting sentencing. *Sheppard v. Maxwell*, 384 U.S. 333, 362, 86 S.Ct. 1507 (1966). When a court, regardless of intent, oversteps its authority and becomes proactive in increasing the length of a sentence through improper and coercive pressure, unintended as it may be, that court oversteps those boundaries and its authority.

For the reasons described above, the district court here overreached its judicial authority and coerced Ms. Angeles to waive objections with a sound legal basis. Accordingly, the Fifth Circuit Court of Appeals should have vacated her sentence and remanded for sentencing before a different judge.

CONCLUSION

Petitioner respectfully prays that this Court should grant certiorari to review the judgment of the United States Court of Appeals for the Fifth Circuit. Alternatively, she prays for such relief to which she is justly entitled. Respectfully submitted this 16th day of September, 2020.



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