NO. _____

In the

Supreme Court of the United States

Javier Alejandro Moline-Borroto, et al.,

Petitioners,

v.

United States of America,

Respondent.

On Petition for a Writ of Certiorari
from the United States Court of
Appeals for the Fifth Circuit

Fifth Circuit Cases No. 19-60294,
19-60295, and 19-60380

PETITION FOR A WRIT OF CERTIORARI

OMODARE JUPITER
Federal Public Defender
N. and S. Districts of Mississippi

KIGER L. SIGH (MB #103540)
Research and Writing Specialist
Northern District of Mississippi
1200 Jefferson Avenue, Suite 100
Oxford, Mississippi 38655
Telephone: (662) 236-2889
Facsimile: (662) 234-0428

M. SCOTT DAVIS (MB #103225)*
Assistant Federal Public Defender
Northern District of Mississippi
1200 Jefferson Avenue, Suite 100
Oxford, Mississippi 38655
Telephone: (662) 236-2889
Facsimile: (662) 234-0428
*Counsel of Record for Petitioner

Attorney for Petitioner-Defendant

QUESTION PRESENTED

The issue in this case is based upon an encounter between Mr. Moline and highway patrol officers that occurred at a driver's license checkpoint. Mr. Moline and his two traveling companions, both of whom were seated in the back of the vehicle, arrived at the checkpoint shortly after midnight. The checkpoint had not been active for very long, and the few vehicles that had come through had been allowed to pass on after quick checks of driver's licenses.

Mr. Moline's encounter, however, was quite different. The trooper seized not only Mr. Moline's valid driver's license, but the identifications of his two travel companions as well, and engaged in extended interrogation of them; unlike the seven vehicles that came before him. Mr. Moline was ordered out of the vehicle, a narcotics-sniffing dog was brought to the scene, and the officers eventually searched the vehicle. The focus of this petition is the very brief window of time immediately following the vehicle's arrival at the driver's license checkpoint, well before the dog arrived.

This petition presents a straightforward case for certiorari review. The question presented is whether the lower courts erred by finding that the officer had reasonable suspicion to transform a suspicionless checkpoint seizure into a prolonged investigatory encounter. Mr. Moline asks this Court to grant review to clarify and reaffirm *Terry v. Ohio*, 392 U.S. 1 (1968) and *Rodriguez v. United States*, 575 U.S. 348 (2015) at suspicionless seizures.

PARTIES TO THE PROCEEDING

Petitioner is Javier Alejandro Moline-Borroto *et al.*, who was a Defendant-Appellant in the court below. Respondent, the United States of America, was the Plaintiff-Appelleein the court below.

COURT PROCEEDINGS

United States v. Javier Moline-Borroto, 1:18-CR-070 Northern District of Mississippi; Denial of Motion to Suppress entered November 28, 2018.

United States v. Javier Moline-Borroto, 1:18-CR-070 Northern District of Mississippi; Original Judgment entered April 25, 2019.

United States v. Javier Moline-Borroto, Fifth Circuit Case Number 19-60294, 970 F.3d 613 (2020) entered on August 18, 2020.

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PETITION FOR A WRIT OF CERTIORARI

Petitioner Javier Alejandro Moline-Borroto ("Mr. Moline") *et al.* seeks a writ of certiorari to review the judgment of the United States Court of Appeals for the Fifth Circuit.

OPINIONS BELOW

The petitioner, Mr. Moline, respectfully petitions for a writ of certiorari to review the judgment and opinion of the United States Court of Appeals for the Fifth Circuit, entered in the above-entitled proceeding on August 18, 2020. The Opinion and Judgment are attached hereto as composite Appendix 1. The published opinion of the Court of Appeals for the Fifth Circuit can be found in the Westlaw electronic database at *United States v. Burgos Coronado et al.*, 970 F.3d 613 (2020). A copy of the published Opinion is attached as Appendix 3.

The district court entered an Order denying the suppression motion on November 28, 2018 and a Judgment reflecting this sentence on January 17, 2019. A copy of the Judgment is attached hereto as Appendix 2.

JURISDICTION

The Opinion of the Fifth Circuit Court of Appeals in *United States v. Burgos Coronado et al.*, 970 F.3d 613 (2020), was entered on August 18, 2020. Petitions for panel rehearing and rehearing *en banc* were denied on September 17, 2020. This petition is filed within 150 of that date in compliance with Rule 13.1 of the Supreme Court Rules and the Court's Filing Deadlines Order related to COVID-19. *See* https://www.supremecourt.gov/orders/courtorders/031920zr_d1o3.pdf. The

jurisdiction of this Court to review the judgment of the Fifth Circuit is invoked under 28 U.S.C. § 1254(1).

CONSTITUTIONAL PROVISION INVOLVED

The Fourth Amendment of the United States Constitution forbids unreasonable searches and seizures: "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated . . ." U.S. Const. Amend. IV.

STATEMENT OF THE CASE

I. Procedural History

Petitioner, Mr. Javier Alejandro Moline-Borroto[1], was charged on May 21, 2018, by Criminal Complaint in the United States District Court for the Northern District of Mississippi, with three offenses related to credit card fraud. A preliminary and detention hearing was held on May 29, 2018, during which the Court found probable cause are ordered the defendants detained pending trial. An Indictment was returned on June 20, 2018, charging the defendants with five counts: one count of conspiracy to defraud, three counts of possession of various instruments of fraud, and one count of use of unauthorized access devices.

On September 4, 2018, Mr. Moline's counsel filed a Motion to Suppress, jointed by all co-defendants, alleging that Mr. Moline had been subjected to an illegal detention in violation of the Fourth Amendment during his interaction with the

[1] Throughout this petition, the collective defendants are referenced as Mr. Moline, as he was the driver of the vehicle, and his record on appeal is referenced as much as possible.

troopers on May 18, 2018. A hearing was held on November 7, 2018, and, after testimony and argument, the trial court denied the suppression motion.

Soon thereafter, the defendants entered conditional pleas of guilty, preserving their right to appeal the denial of the suppression motion. Each defendant was sentenced on January 17, 2019. Mr. Moline filed a timely notice of appeal, and his appeal was ultimately consolidated with that of co-defendants Coronado and Balza. *See* Fifth Circuit Case No. 19-60295 Documents 00514983044 and 00514986399.

The district court held a suppression hearing on November 7, 2018. An Order was issued on November 28, 2018, denying the Motion to Suppress. Mr. Moline filed a timely notice of appeal, and his was eventually consolidated with Mr. Coronado's and Ms. Balza's appeal. *See* Fifth Circuit Case No. 19-60295 Documents 00514983044 and 00514986399.

Following briefing and oral argument, the Fifth Circuit Court of Appeals issued a published opinion on August 18, 2020, affirming the trial court's denial of the motion to suppress. Specifically, the Court held that the highway patrol officers had the "miminum level of objective justification to support reasonable suspicion of criminal activity – namely, human trafficking – sufficient to justify prolonging the stop by inquiring further about where the Toyota occupants were going."

Mr. Moline now files this petition for writ of certiorari.

II. Factual History

Around midnight on May 18, 2018, highway patrol officers set up a driver's license checkpoint on a highway near Starkville, Mississippi. The purpose of the

checkpoint, according to Trooper Gregory Bell, was to check for valid licenses and to make sure that basic safety measures, such as seatbelts being worn, were being followed. The first seven vehicles were allowed to pass through without incident. Of these seven vehicles, none was kept at the checkpoint for longer than 88 seconds, and the some were allowed to pass through after just a few seconds – just long enough for an officer to see that seatbelts were buckled and to look at the driver's license.

The eighth vehicle to arrive at the checkpoint was a Toyota with a Florida tag being driven by Mr. Moline and occupied by Mr. Moline and two companions. Trooper Matthew Minga, supervised by Trooper Bell, made contact with Mr. Moline, who immediately provided a valid driver's license and informed the officer that the vehicle was a rental. There were no signs of impairment or duress, and the requested licensure was in order. However, rather than allowing Mr. Moline to proceed, Trooper Minga began interrogating Mr. Moline about his two passengers, who were seated in the backseat, and their itinerary. This included the seizure of the two passengers' identifications, which were never returned. Ms. Balza, one of the passengers, provided a Venezuelan passport. At the preliminary hearing held a few days later, Trooper Bell testified that the passport was valid. Months later at the suppression hearing, his opinion about that passport had changed, and he stated that her passport lacked an entry stamp, though he acknowledged he did not know the difference between a valid and invalid passport.

Mr. Moline and his companions are Venezuelan nationals, and Spanish is their primary language. According to the troopers, Mr. Moline was polite, though the

language barrier made it difficult for Mr. Moline to understand all of the troopers' questions. At the preliminary hearing, Trooper Bell was asked specifically and repeatedly what suspicious factors existed that warranted extended interrogation and investigation. He stated that he found the seating arrangement and cited some confusion over Mr. Moline's responses to questions about their itinerary. Months later at the suppression hearing, he testified that the seating arrangement made him concerned that human trafficking might be afoot, despite no evidence of restraint or duress.

Meanwhile, but during this extended interrogation, a Volkswagen arrived at the checkpoint, also bearing a Florida tag and occupied by Venezuelan nationals. Once the troopers realized that there were consecutive vehicles with similar identifiers, they asked the two drivers if they were traveling with anyone else. According to the officers, the two men gave conflicting answers, which elevated their suspicion. The officers asked for consent to search the vehicles. Mr. Moline declined to sign a consent form, and the driver of the Volkswagen gave consent to search. A drug-sniffing dog was brought out, and the troopers claim the dog alerted to the presence of narcotics on Mr. Moline's vehicle. The officers searched both vehicles, and while Mr. Moline's vehicle contained none of the narcotics that the dog supposedly alerted to, evidence of credit card skimming was recovered from both vehicles.

REASONS FOR GRANTING THIS PETITION

I. The Fifth Circuit Court of Appeals has wrongly decided that a suspicionless seizure may be turned into a prolonged investigatory encounter based on subjective reasonable suspicion.

In 1968, the Supreme Court ruled that if a law enforcement officer can point to specific, articulable facts that lead him to reasonably suspect "that criminal activity may be afoot," then he may conduct a brief investigative stop. *Terry v. Ohio*, 392 U.S. 1, 21–22 (1968). Further, this Court has approved limited suspicionless seizures in special circumstances, including Border Patrol stops for undocumented person, sobriety checkpoints for impaired drivers, and, as here, checkpoints to verify drivers' licenses and vehicle registration. *See City of Indianapolis v. Edmond*, 531 U.S. 32 (2000). In 2015, this Court held that officers must have additional reasonable suspicion of criminal activity to extend an otherwise completed traffic stop. *Rodriguez v. United States*, 575 U.S. 348 (2015).

At a driver's license checkpoint, which constitutes a suspicionless seizure, officers may conduct a brief investigation as long as there is a "legitimate, programmatic purpose." *Burgos-Coronado*, 970 F.3d at 618 (citing *Edmond*, 531 U.S. at 47). Here, the driver's license checkpoint is not challenged as *per se* unconstitutional by the parties. *See e.g.*, *Delaware v. Prouse*, 440 U.S. 648 (1979).

However, there is a fundamental difference between traditional, suspicion-based seizures, and suspicionless seizures. Officers involved in suspicion-based seizures, *i.e. Terry* encounters, can point to specific, objective factors that support their belief that the defendant was engaged in criminal activity; for example, when

officers pull over a vehicle based on a traffic violation or an officer responds to a 911 call, there is already reasonable suspicion of criminal activity, even if only a *de minimins* violation. A suspicion-based seizure occurs where criminal activity has been reported or seen and there is an investigative basis for initiating the encounter.

On the other hand, suspicionless seizures do not require evidence of criminal activity. Instead, officers are allowed to engage in limited seizures for specific, programmatic purposes; a roadblock seizure or driver's license checkpoint falls into the category of suspicionless seizures because it is conducted in the absence of a warrant and without probable cause or reasonable suspicion. *See e.g., Michigan Dept. of State Police v. Sitz*, 496 U.S. 444 (1990); *see also Prouse*, 440 U.S. 648. The standard should be higher in these circumstances, as these encounters are not predicated on some level of particularized criminal suspicion. Officers are not permitted to transform such seizures into investigative encounters without objectively reasonably bases for doing so – that is, that officers have more than a mere hunch that criminal activity is afoot.

This Court has never precisely defined "mere hunch." Rather, it has defined reasonable suspicion as meaning more than a mere hunch or intuition. *Terry,* 392 U.S. at 21-22. An officer operating on a mere hunch is not proceeding based on reasonable suspicion or probable cause.

Hunch is defined as "a feeling or guess based on intuition rather than known facts." *Hunch*, Oxford English Dictionary, https://languages.oup.com/google-dictionary-en/ (last visited Nov. 23, 2020). Hunches are quick instinctive responses

that are felt more than they are thought. The German cognitive psychologist Gerd Gigerenzer coined the term "fast and frugal heuristics" to describe the way the human mind operates under real world conditions of "bounded rationality," where information is sparse and time is limited. Craig S. Lerner, *Reasonable Suspicion and Mere Hunches*, 59 Vand. L. Rev. 407, 410 (2006) (citing generally Gerd Gigerenzer & Peter M. Todd, *Simple Heuristics That Make Us Smart* (1999)). Because of this, objective factors are not considered in the time it takes to act upon a hunch.

Reasonableness, on the other hand, is equated with objective and particularized evidence, which is distinguished from subjective and generalized evidence. Courts must assess the facts against an *objective* standard: would the facts available to the officer *at the moment* of the seizure or the search warrant a man of reasonable caution in the belief that the action taken was appropriate? *Id*. In other words, the officer's state of mind is irrelevant - his intent, his hunch, gut instinct, sixth sense, are never relevant under a Fourth Amendment analysis.

Anything less would invite intrusions upon constitutionally guaranteed rights based on nothing more substantial than inarticulate hunches, a result this Court has consistently refused to sanction. *See e.g.*, *Beck v. Ohio*, 379 U.S., 89 (1964); *Rios v. United States*, 364 U.S. 253 (1960); *Henry v. United States*, 361 U.S. 98 (1959). If subjective good faith alone were the test, the protections of the Fourth Amendment would evaporate, and the people would be "'secure in their persons, houses, papers and effects,' only in the discretion of the police." *Beck*, 379 U.S. at 97.

Never has this Court allowed an officer's subjective opinion, or mere hunch, to satisfy *Terry*. *See e.g.*, *United States v. Arvizu*, 534 U.S. 266, 274 (2002) ("Although an officer's reliance on a mere " 'hunch' " is insufficient to justify a stop, the likelihood of criminal activity need not rise to the level required for probable cause, and it falls considerably short of satisfying a preponderance of the evidence standard.") (internal citations omitted).

Without reasonable suspicion of criminal activity, an officer may not initiate a seizure. *Brown v. Texas*, 443 U.S. 47, 51–52 (1979). In *Brown*, police officers approached a man after he was seen walking away from another man in an alley in an area known for drug trafficking. When the man refused to identify himself, he was arrested. The flaw in the State's case was that none of the circumstances preceding the officers' detention of the appellant amounted to reasonable suspicion that he was involved in criminal conduct. *Id.* The officer testified that the situation in the alley "looked suspicious," but he was unable to point to any facts supporting that conclusion. When pressed, Officer Venegas acknowledged that the only reason he stopped appellant was to ascertain his identity. In the absence of any objective basis for suspecting the appellant of misconduct, the balance between the public interest and appellant's right to personal security and privacy tilts in favor of freedom from police interference. *Id.*

When such a stop is not based on objective criteria, the risk of arbitrary and abusive police practices exceeds tolerable limits. Officers must be able to point to

specific, articulable facts of criminal activity that is occurring or has occurred to prolong an otherwise suspicionless seizure.

As such, the Opinion of the Fifth Circuit Court of Appeals conflicts with this Court's precedent. Mr. Moline challenges the finding that the officer's hunch regarding human trafficking, based on the factors available to him at the time of the seizure, satisfied the standards established by this Court. The holdings of the Trial Court and Fifth Circuit effectively permit officers free range to interrogate people during suspicionless seizures.

Here, there is also an underlying issue of racial profiling. While generally a taboo subject, the facts provided suggest the unlawful detention was premised, even if only partially, on unlawful grounds. The only facts known to the officer at the moment that the seizure became investigatory beyond the programmatic purpose of the stop, were that the occupants of the vehicle were Venezuelan, the car had a Florida tag, nothing illegal was in plain view, there were no signs of impairment, the two passengers were seated in the backseat, and the driver, Mr. Moline, had a valid driver's license. Yet, based on these factors alone, the trooper's eventual testimony was that he was concerned Mr. Moline was involved in "human trafficking."

Many critics of the reasonable suspicion test contend that the test permits racial profiling, because it uses stereotypes and profiles. Jennifer Pelic, *United States v. Arvizu: Investigatory Stops and the Fourth Amendment*, 93 J. Crim. L. & Criminology 1033, 1054, FN215 (2003). These stereotypes draw conclusions of criminal activity based on the race of the individual under the

assumption that certain races are more likely to commit crimes than other races. *Id*. at FN 216.

Trooper Bell testified that the stated purpose of driver's license checkpoints was to check driver's licenses, insurance documentation, seat belt usage, and other "safety aspects." ROA.19-60295.523, 554; *Burgos-Coronado*, 970 F.3d at 618. These stated, programmatic purposes were satisfied within seconds of the inception of the encounter. Mr. Moline handed over a valid driver's license, all three occupants were wearing seat belts, nothing illegal or suspicious was in plain view, and Mr. Moline provided information that the vehicle was a rental. ROA.19-60295.530, 572. This satisfied the stated purpose of the checkpoint, and he should have been allowed to pass after mere seconds, as the vehicles in front of him were allowed to do. Instead, the officer seized the identifications of all the occupants, not just Mr. Moline, and initiated an extended and investigatory interrogation.

Trooper Bell unequivocally stated the seating arrangement was the primary reason for suspecting human trafficking. ROA.19-60295.531. Objectively, however, such suspicion was not justified. Given the totality of the circumstances, suspicion of human trafficking was objectively unreasonable. Due weight must be given, not just to Trooper Bell's inchoate and unparticularized suspicion or "hunch," but to the specific reasonable inferences which he is entitled to draw from the facts in light of his experience. *Terry*, 392 U.S. at 27. Hunches are not probative evidence. While Trooper Bell did not expressly call it a hunch, his testimony reveals that it was

nothing more. He provided no corroboration as to why he suspected human trafficking, other than he though the arrangement was strange. ROA.19-60295.531.

At a lengthy preliminary hearing shortly after the stop itself, Trooper Bell never mentioned concern of human trafficking, despite being asked repeatedly and specifically about his suspicion necessary to justify extending the encounter. Neither was this concern referenced in any contemporaneous investigative report. ROA.19-60295.568-70. Months later, at the suppression hearing, Trooper Bell testified for the first time that he was concerned about human trafficking.

If Trooper Bell suspected human trafficking, he had plentiful opportunities to say so, in both written reports and in his initial testimony. Trooper Bell's inconsistent testimony casts even more doubt about the objective legitimacy of his alleged suspicion. *See e.g.*, *Brown*, 443 U.S. at 51; *see also United States v. Beck*, 602 F.2d 726, 729 (5th Cir. 1979) (reversing after the officer's mere, unfounded feeling that something might be afoot did not warrant his stop of the vehicle). Had Trooper Bell included this information in his arrest report or testified he suspected human trafficking at the preliminary hearing, that would at least lend some credibility to the notion that he was actually suspicious of human trafficking. However, given the factors known to the officers at the time the encounter was extended beyond its programmatic purpose, such suspicion would be objectively unreasonable, even if genuine.

Finally, this Court has never held that a seating arrangement by itself could satisfy reasonable suspicion. Only one district court has addressed this specifically.

United States v. Bristol, 819 F. Supp. 2d 135, 143 (E.D.N.Y. 2011) ("[A] two-to-the-back seating arrangement alone falls short of satisfying the reasonable suspicion standard."). The *Bristol* court listed numerous, innocent reasons why people would choose to sit in the back seat rather than the front — they have dropped off a front-seat passenger and chosen not to rearrange, maybe the passengers wanted more leg room or to talk to one another, or perhaps a spill or seatbelt problem makes the front passenger seat undesirable, or maybe the passengers are a couple and wanted to sit together. *Id*. at n. 13. Using the seating arrangement, without any other sign of restraint, coercion, or duress, as a basis for suspecting human trafficking is objectively unreasonable.

The Fifth Circuit Panel noted nine relevant factors that were known to the highway patrol officers at the beginning of Trooper Bell's interrogation of Mr. Moline. *Burgos-Coronado*, 970 F.3d at 620.

> (1) the encounter occurred shortly after midnight;
>
> (2) the Toyota had an out-of-state license plate;
>
> (3) the driver of the Toyota had a temporary driver's license;
>
> (4) that temporary driver's license was also out-of-state;
>
> (5) the driver informed the officers that the vehicle was a rental;
>
> (6) the driver was a man, the passenger seat was unoccupied, and there was a man and a woman occupying the rear seats;
>
> (7) the driver began translating to the passengers in Spanish;
>
> (8) the male passenger produced another out-of-state temporary driver's license;

(9) the female passenger produced a Venezuelan passport with no entry stamp.

Id.

Factors (1), (2), (3), (4), (5), (7), and (8), even when taken together, do not form an objectively reasonable basis for believing that criminal activity is afoot. Most checkpoints are set up late at night, many vehicles have out-of-state license plates, temporary driver's licenses are still valid, speaking Spanish does not indicate suspicion, and Mr. Moline gave truthful information that the vehicle was a rental. *Id*. None of these factors indicate illegal activity, individually or collectively.

The only two factors that could possibly justify prolonging a seizure are factors (6) and (9), the seating arrangement and the passport issue. The seating arrangement, for the reasons stated, is not inherently suspicious, and inferring human trafficking from something so innocuous borders on absurdity. Further, the passport should not have been considered in the lower courts' analyses, because the issue of the passport allegedly lacking an entry stamp was not known to the officers during the encounter. Indeed, Trooper Bell testified at the contemporaneous preliminary hearing that the passport was valid, and only testified to the contrary months later, presumably after preparing for his testimony with the prosecutor.

Trooper Bell's belief that the seating arrangement indicated human trafficking was not objectively reasonable. Even giving him the benefit of the doubt (which is likely not warranted given the inconsistencies in his testimony), that it was his subjective belief that human trafficking was afoot belief, such a notion fails the objective standard required by *Terry* and its progeny. *See United States v. Sokolow*,

490 U.S. 1, 7 (1989) ("The officer, of course, must be able to articulate something more than an "inchoate and unparticularized suspicion or 'hunch."); *see also United States v. Lopez-Moreno*, 420 F.3d 420, 430 (5th Cir. 2005) ("In scrutinizing the officer's basis for suspecting wrongdoing, it is clear that the officer's mere hunch will not suffice."); *see also United States v. Hill*, 752 F.3d 1029 (5th Cir. 2014) (same).

Without anything more, this mere hunch cannot satisfy the standard set forth in *Terry* and *Brown*. *Terry* requires, and *Brown* clarifies, that officers must point to specific, articulable facts suggesting *that criminal activity may be afoot*. *Brown*, 443 U.S. at 51-52 (citing *Terry*). Trooper Bell's own words suggest no specificity or objectivity, only the tenuous possibility that Mr. Moline was involved in human trafficking. *Terry*, 368 U.S. at 27; *see also Sokolow*, 490 U.S. at 7 ("Reasonable suspicion" entails some minimal level of objective justification for making a stop, that is, something more than inchoate or unparticularized suspicion or "hunch."). At most, the officers were operating on a hunch.

While the Fifth Circuit's analysis addressed these specific factors surrounding the reasonable suspicion, it erroneously gave undue weight to the officer's focus on the seating arrangement and Trooper Bell's *subjective* hunch that human trafficking was occurring. Accordingly, its decision to affirm the denial of the suppression motion constitutes error and is in direct contradiction to other Fourth Amendment precedent.

CONCLUSION

This Court should grant review for the above stated compelling reasons. The Fourth Amendment requires an objective basis for reasonable suspicion of criminal activity in order for an otherwise lawful suspicionless encounter to transform into investigatory detention, and an officer's mere hunch does not suffice. The factors known to the officers at the time of this transformation did not provide an objectively reasonable suspicion that human trafficking was occurring. The Petitioner respectfully requests that this Court grant the instant Petition for Writ of Certiorari.

Respectfully submitted,

OMODARE JUPITER
Federal Public Defender

____**/s/**_____

M. SCOTT DAVIS
KIGER L. SIGH
Assistant Federal Public Defender
N. and S. Districts of Mississippi
1200 Jefferson Avenue, Suite 100
Oxford, Mississippi 38655
Telephone: (662) 236-2889
Facsimile: (662) 234-0428

Attorney for Petitioner-Defendant