

No. 21-5941

**ORIGINAL**

IN THE  
SUPREME COURT OF THE UNITED STATES

Supreme Court, U.S.  
FILED  
**OCT 06 2021**  
OFFICE OF THE CLERK

Angela Michelle Morelli — PETITIONER  
(Your Name)

vs.

Joshua B. Flynn, et. al. — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

United States Court of Appeals for the Ninth Circuit  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Angela Michelle Morelli  
(Your Name)

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(City, State, Zip Code)

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(Phone Number)

## QUESTION(S) PRESENTED

1. Why are Womens' Constitutional Rights being violated under the 14th Amendment, for both procedural Due Process and Life, Liberty and Property, legally across the Nation?

How is it that any other criminal matter regarding violence or theft, would be reviewed in a "procedural due process hearing" orally and materially prior to a judgement, and prior to being sent to a civil dispute, other than Domestic Violence Cases involving a child?

Why is it that the tactical advantage in this manner that is violating Due Process and resulting in the removal of Life, Liberty or Property of the victim allowed, when the law clearly states throughout the Nation that it is detrimental for the child to not be in the custody of the perpetrator, then removing the victim from the child, placing the perpetrator in control of the court's opinion, resulting in Domestic Relations that cannot and will not be heard in a Federal Court Jurisdiction, even when the issue is not custody, but the violations of the Constitution's 14th Amendment that occurred in the court proceedings?

If false "hearsay" evidence was used and the victim proved with material evidence that it wasn't true, and a 1970 text message was the very next text claimed by the perpetrator after the assault and the victim was of color, would they be heard in Federal Court? If the victim did not have a child with the perpetrator and the same a previous statement occurred, would they be heard in Federal Court?

2. Why is it detrimental for not only the child involved in Domestic Violence, the courts influence on the community in both the present and the future, but also the individual rights of the victim of physical, sexual, financial, verbal and religious assault on a Constitutional level?

## TABLE OF CONTENTS

OPINIONS BELOW .....	1
JURISDICTION.....	
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED .....	
STATEMENT OF THE CASE .....	
REASONS FOR GRANTING THE WRIT .....	
CONCLUSION.....	

## INDEX TO APPENDICES

APPENDIX A • Appeal from U.S. District Court for the District of Hawaii;

APPENDIX B • Order Granting Motion to Dismiss Plaintiff's Second Amended complaint

APPENDIX C • Custody, visitation support after voluntary establishment of paternity

APPENDIX D

APPENDIX E

APPENDIX F

## LIST OF PARTIES

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:

County of Maui  
United States of America

## RELATED CASES

- Morelli v Heyman, FC-DA No. 16-1-0501, family court in the Second Circuit State of Hawaii. Judgement entered August 24, 2016.
- Heyman v Morelli, FC-P No. 16-1-0098, family court in the Second Circuit State of Hawaii. Judgement entered July 18, 2017.
- Morelli v Heyman, et al., D.C. No 1:19-cv-00088 JMS-WRP, United States District Court District of Hawaii. Judgement entered July 08, 2020.

## TABLE OF AUTHORITIES CITED

CASES	PAGE NUMBER
STATE v CARTER (1988)	
JK v. SK, CA - 2019	
<i>Juarez v. Juarez, No. 33668-9-111</i>	

## STATUTES AND RULES

Amendment XIV, Section 1.

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**

For cases from **federal courts**:

The opinion of the United States 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,  
 is unpublished.

The opinion of the United States 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,  
 is unpublished.

For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix N/A 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 Family Court of the Second Circuit court appears at Appendix C 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 United States Court of Appeals decided my case was July 08, 2021.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals 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. § 1254(1).

For cases from **state courts**:

The date on which the highest state court decided my case was July 18, 2017. A copy of that decision appears at Appendix C.

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

**Amendment XIV, Section 1.** All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the state wherein they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any state deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

### **42 U.S. Code § 1983 - Civil action for deprivation of rights**

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects, or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constitution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress, except that in any action brought against a judicial officer for an act or omission taken in such officer's judicial capacity, injunctive relief shall not be granted unless a declaratory decree was violated or declaratory relief was unavailable. For the purposes of this section, any Act of Congress applicable exclusively to the District of Columbia shall be considered to be a statute of the District of Columbia.

### **Hawaii Revised Statute §571-46**

Criteria and procedure in awarding custody and visitation; best interest of the child. (a) In actions for divorce, separation, annulment, separate maintenance, or any other proceeding where there is at issue a dispute as to the custody of a minor child, the court, during the pendency of the action, at the final hearing, or any time during the minority of the child, may make an order for the custody of the minor child as may seem necessary or proper. In awarding the custody, the court shall be guided by the following standards, considerations, and procedures:

(9) In every proceeding where there is at issue a dispute as to the custody of a child, a determination by the court that family violence has been committed by a parent raises a rebuttable presumption that it is detrimental to the child and not in the best interest of

## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

the child to be placed in sole custody, joint legal custody, or joint physical custody with the perpetrator of family violence. In addition to other factors that a court shall consider in a proceeding in which the custody of a child or visitation by a parent is at issue, and in which the court has made a finding of family violence by a parent:

- (A) The court shall consider as the primary factor the safety and well-being of the child and of the parent who is the victim of family violence;
- (B) The court shall consider the perpetrator's history of causing physical harm, bodily injury, or assault or causing reasonable fear of physical harm, bodily injury, or assault to another person; and
- (C) If a parent is absent or relocates because of an act of family violence by the other parent, the absence or relocation shall not be a factor that weighs against the parent in determining custody or visitation;
- (10) A court may award visitation to a parent who has committed family violence only if the court finds that adequate provision can be made for the physical safety and psychological well-being of the child and for the safety of the parent who is a victim of family violence;
- (11) In a visitation order, a court may:
  - (A) Order an exchange of a child to occur in a protected setting
  - (B) Order visitation supervised by another person or agency;
  - (C) Order the perpetrator of family violence to attend and complete, to the satisfaction of the court, a program of intervention for perpetrators or other designated counseling as a condition of the visitation;
  - (D) Order the perpetrator of family violence to abstain from possession or consumption of alcohol or controlled substances during the visitation and for twenty-four hours preceding the visitation
  - (E) Order the perpetrator of family violence to pay a fee to defray the costs of supervised visitation
  - (F) Prohibit overnight visitation

## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

- (G) Require a bond from the perpetrator of family violence for the return and safety of the child. In determining the amount of the bond, the court shall consider the financial circumstances of the perpetrator of family violence;
- (H) Impose any other condition that is deemed necessary to provide for the safety of the child, the victim of family violence, or other family or household member; and
- (I) Order the address of the child and the victim to be kept confidential;

### **Hawaii Revised Statute 586-3 Order for protection**

- (a) There shall exist an action known as a petition for an order for protection in cases of domestic abuse.
- (b) A petition for relief under this chapter may be made by:
  - (1) Any family or household member on the member's own behalf or on behalf of a family or household member who is a minor or who is an incapacitated person as defined in section 560:5-102 or who is physically unable to go to the appropriate place to complete or file the petition; or
  - (2) Any state agency on behalf of a person who is a minor or who is an incapacitated person as defined in section 560:5-102 or a person who is physically unable to go to the appropriate place to complete or file the petition on behalf of that person.
- (c) A petition for relief shall be in writing upon forms provided by the court and shall allege, under penalty of perjury, that: a past act or acts of abuse may have occurred; threats of abuse make it probable that acts of abuse may be imminent; or extreme psychological abuse or malicious property damage is imminent; and be accompanied by an affidavit made under oath or a statement made under penalty of perjury stating the specific facts and circumstances from which relief is sought.
- (d) The family court shall designate an employee or appropriate nonjudicial agency to assist the person in completing the petition.

## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

**Hawaii Revised Statute §707-711** Assault in the second degree. (1) A person commits the offense of assault in the second degree if: (a) The person intentionally, knowingly, or recklessly causes substantial bodily injury to another; (b) The person recklessly causes serious bodily injury to another; (c) The person intentionally or knowingly causes bodily injury to a correctional worker, as defined in section 710-1031(2), who is engaged in the performance of duty or who is within a correctional facility (d) The person intentionally or knowingly causes bodily injury to another with a dangerous instrument;

### **Hawaii Revised Statute §709-906**

Abuse of family or household members; penalty. [Repeal and reenactment on June 30, 2026. L 2020, c 19, §15.] (1) It shall be unlawful for any person, singly or in concert, to physically abuse a family or household member or to refuse compliance with the lawful order of a police officer under subsection (4). The police, in investigating any complaint of abuse of a family or household member, upon request, may transport the abused person to a hospital or safe shelter.

## STATEMENT OF THE CASE

On August 11, 2016 Morelli filed a preplanned TRO. Her mother was landing that day from Florida to assist Morelli with the care of her son while in transition to a home in which Morelli had hoped would be protected by law under Hawaii Revised Statute §571-46. The TRO Morelli v Hyman granted her a protective order until the hearing on August 24, 2016. At the hearing, Morelli was not allowed to present discovery or testimony in regards to the multiple assaults. Morelli was not allowed to show her medical records stating some of the verbal abuse, and property damage. Morelli was not allowed to present photos of substantial damage to her face that was time stamped, showing the increase of swelling and in correlation of the 911 calls. Mr. had already used Coerson to keep Morelli unlawfully imprisoned, and financial abuse to ensure that Morelli could never leave without his control. Instead a "status quo" protective order allowed Hyman to have visitation with ABH and walk up to her front door if necessary. ABH was also on the protective order because Morelli noticed that her son stopped talking about 30 days after she started working and ABH was in the care of Hyman. Morelli was sexually assaulted with ABH present on the morning of 08/07/2016, that was the day Morelli knew both her and her son could not take anymore and called her mother to fly out and file the protective order.

During the hearing Hyman was granted visitation, and the criminal acts by perpetrator Hyman and a future protective order was assigned and to be determined by the Custody hearing on September 14, 2016. This allowed Hyman to create false stories and falsified evidence with not one legitimate material fact, to take over the court proceedings. Annie Clifford (Annie Neikirk, Annie Huntley, Annie Bronson) presented several declarations under Perjury, making up stories about Morelli's claims to file a false TRO, all in which Morelli proved with material discovery was false. These stories Annie created and the 1970 text message that was falsified turned the court against Morelli and to this day her evidence was never heard. Even the "expert witness" who has made known false claims against women in the Second Circuit Court, claimed Morelli was paranoid, not taking in account the mild PTSD and numerous text messages of verbal and financial abuse from Hyman. It should be known from the Judges on who review this Petition, that women under extreme circumstances can have symptoms of abuse and are listed in the "A JUDGE'S GUIDE:MAKING CHILD-CENTERED DECISIONS IN CUSTODY CASES Second Edition American Bar Association Child Custody and Adoption Pro Bono Project, A Project of the Standing Committee on Pro Bono and Public Service and the Family Law Section American Bar Association" that most women of abuse are taking a lot of responsibility to make an

## STATEMENT OF THE CASE

escape, ask the court for intervention, and continually being apart of the legal system with no prior knowledge of how it works, only the truth of the abuse and the effects that they wish to seek relief from.

I am asking for review of the material facts that were never allowed to be presented in a hearing, not for the intention of regaining custody, but review the process and procedure that should be review and have the Supreme Court recognize that most Domestic violence cases are women, and since its domestic a majority of those victims have children. By not allowing criminal investigative processes in the court to be determined, sending a criminal action to spit asset, it is detriment to the child, the child's future as a witness of violence, but also the interaction that child will have in the community in the future having the same statistics as a victim of abuse themselves.

Using false evidence as my 1970 text and false testimony can not be admissible in any other proceeding. The issue the domestic violence is that most victims who are women have been coerced and controlled financially, therefore are prose and need or require the assistance of the community, not like the county of Maui tha has not one pro bono Lawyer, not one Lawer that assist specifically in my case, as I am now someone the wrong doer by asking the court for relief of my fundamental rights a human being. In addition the Pro Se litigant, forced to have no assistance can now Never receive the benefit of a mistrial when a 1970 text message is the supposed net text after being raped, and when the Judge takes everything like in my case, I couldn't even speak of my Perpretaro even if it was true, therefore no GOFUND me, therefore I was on the street with nothing and no one to help and no way I could file an appeal when surviving. This is a crime against humanity, specifically women, because once all these events happen, Domestic Relations and being a state court loser say, I can't be heard on a Federal Level even when my 14th Amendment was clearly violated.

I urge you to please, read my case and use my case as an example of why revisions and clear procedural elements should be defined when a Domestic Violence case involving a child is at issue within the court procedure. I do not seek fame, nor money, but only my freedom and my liberty that I lost. There truly is no amount of money in this world that can give me back my time and the years that were taken from me with my son.

## **REASONS FOR GRANTING THE PETITION**

To avoid erroneous deprivations for the right for Women to receive the application of the 14th Amendment and ensure equal protection under the color of law during Domestic Violence court proceedings.

In the STATE v CARTER (1988), The Supreme Court went against their own rules to correct a matter that was racially motivated, by having false and altered evidence and false testimony. The only difference in my case is I am a woman and I was not convicted of a crime, therefore there is no action to be overturned.

The Supreme Court knows that Domestic Violence is bad for the economy, and with our ever changing restrictions, declining economy, the nation cannot afford for the continuation of civilians Constitutional and statutory laws to be violated, integrating the criminal/perpetrator in society to continue the cycle with someone else or maybe even the child involved, instead of having social control.

### **Cases similar to mine:**

JK v. SK  
CA - 2019

In this appeal of a protection order denial, DV LEAP and pro bono counsel Sheppard Mullin filed an amicus brief in support of the petitioner, a rape survivor, addressing the trial court's biased reasoning and rulings. The court record was replete with examples of the judge's reliance on irrelevant facts and inaccurate stereotypes, including what the survivor wore the night of the attack; that she co-parented with her alleged abuser, who was also the father of her child; and that she didn't immediately disclose the attack the way a 'real' rape survivor would. The amicus brief identified the court's express and implicit assumptions about survivor behavior as examples of well-known "rape myths," which are unsupported by empirical evidence and, in this case, likely affected the ultimate decision. The case is pending. Retrieved on 10/06/2021, from <https://www.dvleap.org/legal-resource-library-categories/briefs-court-opinions>.

Ms. J v. Mr. J  
WASHINGTON COURT OF APPEALS - 2016 WASH. APP. LEXIS 2150  
In this case the trial court refused to issue a full-term protection order for a survivor who had suffered a long history of domestic violence by her husband. Instead, the court issued a short-term protection order for 65 days to keep things "status quo" and directed the parties to

## **REASONS FOR GRANTING THE PETITION**

seek relief in a divorce proceeding that the abuser had initiated. DV LEAP, along with pro bono law firms K & L Gates and Baker McKenzie filed an amicus brief arguing that short-term protection orders are unsafe, disempowering to survivors, contrary to the national trend toward to increase the duration of protection orders, and undermine the constitutional rights to parent one's children and to access to justice. The appellate court reversed, holding that the trial court's ruling contradicted WA's protection order statute. The appellate court's opinion also recognized **(1) the dangers survivors experience when they have to come to court multiple times to face their abusers and (2) that denying survivors full hearings is not necessary or appropriate.** Retrieved on 10/06/2021, from

[https://www.dyleap.org/legal-resource-library-categories/briefs-court-opinions.](https://www.dyleap.org/legal-resource-library-categories/briefs-court-opinions)

;

The judge reversed the courts decision and stated

"The crisis is growing." LAWS OF 1992, ch. 111, § 1. "Domestic violence must be addressed more widely and more effectively in our state." LAWS OF 1992, ch. 111, § 1. Since 1984, the legislature has amended the domestic violence Prevention act several times to improve the protection order process "so that victims have ... easy, quick, and effective access to the court system." LAWS OF 1992, ch. 111, § 1. Through its actions "the legislature has sought to further [prevent domestic violence] by taking clear, concrete actions to encourage domestic violence victims to end abuse, leave their abusers, protect their children, and cooperate with law enforcement and prosecution efforts to hold the abuser accountable." *Danny v. Laidlaw Transit Servs.*, 165 Wn.2d 200, 213, 193 P.3d 128 (2008).

Short-term protection orders in deference to other judicial proceedings require a victim of domestic violence to come to court multiple times to face her or his abuser. Prolonged court proceedings increase the risk of danger to a victim of domestic violence. Studies show an increased risk of homicide during extended divorce and child custody proceedings.

Joan Zorza, *Recognizing and Protecting the Privacy and Confidentiality Needs of Battered Women*, 29 FAM. L.Q. 273, 290 (1995). Custody fights are "notoriously volatile." *Pike v. Maguire*, 47 Mass. App. Ct. 929, 716 N.E.2d 686, 688 (1999). Increased contact with an abuser may increase the risk of harm to the victim. *Champagne v. Champagne*, 429 Mass. 324, 708 N.E.2d 100, 102 n.2 (1999). Thus, short-term relief does not fulfill the legislative intent of Washington's Domestic Violence Prevention Act to afford victims of domestic violence with a valuable instrument to increase safety for victims.

At least one other court has interpreted similar provisions of its state's domestic violence laws in a manner similar to our holding. *Parker v. Parker*, No. C-130658, 2014-Ohio-5516, 2014 WL 7177914 (Ct. App. Dec. 17, 2014) (unpublished). In Parker, Cherilyn Parker requested a five-year protection order from contact by her husband. The trial court, however, only entered a one-year order because Parker earlier instituted divorce proceedings. An Ohio domestic violence protection statute read that "[t]he remedies and procedures provided in this section are in addition to, and not in lieu of, any other available civil or criminal remedies," including divorce proceedings. OHIO REV. CODE ANN. § 3113.31(G). According to the appeals court, Parker should not have been denied a civil protection order of sufficient duration simply

## REASONS FOR GRANTING THE PETITION

because she had concurrently sought other legal remedies to remove herself from the danger of domestic violence. The trial court's shortening of relief was an abuse of discretion since the decision was not based on sound legal reasoning.

Parker v. Parker is an unpublished case from the Ohio Court of Appeals. Washington GR 14.l(b) permits a citation to an unpublished decision from other jurisdictions if the decision can be cited to as authority in that jurisdiction. In Ohio, all appellate opinions issued after May 1, 2002 may be cited as legal authority and weighted as deemed appropriate without regard to whether the opinion was published. Omo REP. OP. R. 3.4 ("Use of Opinions").

The trial court holds discretion when entertaining petitions for domestic violence protection orders. Hecker v. Cortinas, 110 Wn. App. at 869 (2002). We will not disturb such an exercise of discretion on appeal absent a clear showing of abuse. Hecker v. Cortinas, 110 Wn. App. at 869. An abuse of discretion is found when a trial judge's decision is exercised on untenable grounds or for untenable reasons. State v. Powell, 126 Wn.2d 244,258, 893 P.2d 615 (1995); Wilson v. Horsley, 137 Wn.2d 500, 505, 974 P.2d 316 (1999). A trial court abuses its direction if its decision was reached by applying the wrong legal standard. State v. Rafay, 167 Wn.2d 644, 655, 222 P.3d 86 (2009).

The trial court need not have granted Anna Juarez a one-year protection order if tenable grounds supported the refusal. Nevertheless, the trial court denied Anna Juarez's request for a one-year domestic violence protection order in order to maintain the status quo until the parties could conduct a hearing in the marital dissolution proceeding. This decision contradicted the language of RCW 26.50.025(2). Therefore, we hold that the trial court abused its discretion. The issuance of the short-term order exposed Anna to the potential for additional violence because she needed to return to court to repeatedly confront her abuser.

Our dissenting brother expresses concern that our ruling will make victims of domestic violence less safe because experienced jurists lack prescience to know which party is truthful. He believes that, when faced with uncertain claims of domestic violence, trial courts would rather enter immediate, but limited, relief. He characterizes most domestic violence protection order petitions as uncertain claims. He predicts that, with our ruling, most trial courts will now deny any relief.

Our dissenting brother does not identify what he considers to be "uncertain claims." If he means, by "uncertain claims," a claim that the petitioner fails to prove at the hearing by a preponderance of the evidence, the trial court should deny relief anyway. If our brother means, by "uncertain claims," claims that the petitioner proves by a preponderance of evidence but fails to remove all doubt as to the claim's validity, nothing in the Domestic Violence Prevention Act empowers the trial court to shorten the duration of the relief because of some reasonable doubt.

## **REASONS FOR GRANTING THE PETITION**

Our brother's prediction of dire results depreciates the abilities and wisdom of Washington Trial Judges. We recognize the difficulty of a trial judge discerning the truth at a show cause hearing. Nevertheless, the law compels a judge to perform her or his best and to issue a ruling as to whether domestic violence occurred and protection is needed. Although we recognize our trial judges as being overworked with crowded dockets, we trust our judges to take the time and conduct a hearing sufficient to arrive at the truth.

We believe our trial judges normally possess the ability to find the truth. An underlying assumption of the dissenting opinion may be that the trial court, during a martial dissolution suit, may be able to better arrive at the truth than the trial court during a Domestic Violence Prevention Act hearing. We may agree that the trial court, during a marriage dissolution hearing, may be able to fashion more comprehensive relief. Nevertheless, we disagree that the trial court may more ably arrive at the truth in a marital dissolution hearing than a domestic violence protection order hearing. The martial dissolution docket is as crowded as a domestic violence protection order docket. Our dissenting brother also fails to note that, if trial courts possess the predilection of granting immediate, but short-term relief in uncertain cases, the trial court is as likely to do so during the martial dissolution docket as during the domestic violence docket."

Retrieved on 10/06/2021, from

<https://drive.google.com/file/d/1RMJZ6iQyl2e0S6KZpZ4Rw2vPS6vGfCR8/view>.

## **CONCLUSION**

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Ayleen Melchado

Date: 10/06/2021