21-7004

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

ADAM LEE WARE,

Petitioner,

-vs-

UNITED STATES OF AMERICA,

Respondent.

ON PETITION FOR WRIT OF CERTIORARI TO

THE UNITED STATES COURT OF APPEALS

FOR THE SEVENTH CIRCUIT

PETITIONER'S CERTIORARI STAGE BRIEF

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QUESTIONS PRESENTED

1. Should certiorari be granted on a petitioner's claim that the deterrent purpose of the Fourth Amendment exclusionary rule does not perform its intended purpose when the good faith exception is applied to an affiant who has been repeatedly warned not to submit deficient affidavits but continues to commit the same type errors.

2. Should certiorari be granted on a petitioner's claim that certiorari should be granted to clarify its holding on what does the Supreme Court have in mind when it speaks of "recurring or systemic negligence."

CERTIFICATE OF INTERESTED PERSONS
Supreme Court Rule 29.6

The petitioner, Adam Ware, makes this certificate of interested persons statement pursuant to Supreme Court Rule 29.6. This is Adam Ware's original Certificate of Interested Persons statement. This is to certify that the following persons has an interest in the outcome of the case:

Brennan, The Honorable Michael B., United States Circuit Court Judge;

Manion, The Honorable Daniel A., United States Circuit Court Judge;

Wood, The Honorable Diane P., United States Circuit Court Judge;

Kienstra, Jeffrey., United States Attorney;

Henderson, Peter W., United States Federal Public Defender;

McDade, Joe Billy, United States District Court Judge; and,

Ware, Adam, Defendant-Petitioner.

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Jurisdictional Statement

This Court has jurisdiction of this matter under 28 U.S.C. §1254(1) because:

1. On August 9, 2021, the United States Court of Appeals for the Seventh Circuit entered its final judgment denying petitioner's motion to suppress.

2. Petitioner filed a motion requesting leave to extent the time to file a writ of certiorari in this Court.

3. The Supreme Court of the United States granted petitioner's request to extent time to file a writ of certiorari.

Table of Authorities

* Case relied upon in support of certiorari stage briefing.

List of Cases Directly Related to This Case

United Sates v Ware,

2020 U.S. Dist LEXIS 6278 Case No. 1:19-cr-10005 (C.D.Ill Peoria Division 2020

United States v Ware,

2019 U.S. Dist LEXIS 126862 Case No. 1:19-cr-10005 (C.D.Ill Peoria Division 2019)

United States v Ware

2021 U.S. App. LEXIS 23575 No.20-3264 (7th. Cir. 2021)

United States District Court for the Central District of Illinois

Docket No. 1:18-cr-10005

Case:

Date of Entry:

STATEMENT OF THE CASE

Sergeant Matthew Lane had been a police officer with the City of Peoria, Illinois, for eighteen years when he applied for a warrant to search Adam Ware's home in February 2019. Those years had not been devoid of controversy:

* In 2013, the Seventh Circuit vacated the denial of a "Franks motion" when Lane's sworn affidavit directly contradicted that of another officer, Erin Barisch, concerning drug trafficking in Peoria. United States v McMurtrey, 704 F.3d 502, 505-06 (7th. Cir. 2013)
* In 2015, one of Lane's affidavits in support of a search warrant was criticized as "fall[ing] short of what we would expect to see" by an appellate panel that was "growing weary of thin affidavits." United States v Thompson, 801 F.3d. 845, 848 (7th. Cir. 2015)(affirming nonetheless because Lane relied on warrant in good faith).
* The same year, an Illinois appellate panel determined that an affidavit Lane had authored in support of a search warrant application was so deficient that he could not have relied on the warrant in good faith. People v Guice, 2015IL App(3d) 130468-U, ¶¶ 15-17(Ill.Ct.App.2015)

Lane's attention-or lack thereof-to the requirements of the Fourth Amendment is the focus of this case, too.

The affidavit. Lane's affidavit described Ware as a drug dealer. Nine months before Lane sought a warrant, Ware was stopped in May 2018 for speeding. A K-9 alerted on his car, and $18,000 in cash (but no drugs) was recovered. The cash was "individually wrapped in rubber bands," which according to Lane's "training and experience," was consistent with how narcotics dealers bundle their currency. Two months later, a "confidential source" reported that Ware was dealing narcotics. Lane and Barisch were "familiar with an Adam Ware and knew him to deal narcotics." The source had called in "at least twice" since the original report in July 2018 and said Ware was still dealing narcotics and storing them at his home at 1103 S. Warren in Peoria. Throughout this time, Ware was on parole for a drug offense involving 15-100 grams of cocaine; he had 7 prior "dangerous drug arrests" and 5 convictions. His parole address was 1103 S. Warren, and he reported vandalism to a vehicle at that address in April 2018.

On February 6, 2019, Lane watched Ware leave his residence and drive to the 2300 block of [West] Millman [Street], where Ware parked:

> [I] observed a male exit a residence and get in the passenger seat of the vehicle. The vehicle remained parked with the lights on. After approximately five minuted, [I] observed the front passenger exit and start walking toward a residence. Based on [my] training and experience, I believed a drug transaction just occurred.

Ware then pulled away from the curb and drove west, and Lane lost track of him.

Lane went back to 1103 S. Warren and saw the same car parked in front with its lights on, and someone was still inside. When Lane drove by the house again, the car was unoccupied. Forty-five minutes later, Barisch saw Ware exit the house, get into the car, and drive away. Barisch, with help of evidence concerning the sufficiency other officiers, then stopped the car for a traffic violation, and (with Ware's consent) searched Ware's person and the car. Nothing was found in the car, but Ware had 4.4 grams of cocaine and $1,140 in his pockets.

Based upon his "training and experience," Lane believed there would be more cocaine inside 1103 S. Warren. Lane's experience included his years as a Peoria police officer. He also once attended a two-week "DEA basic narcotics investigation school." He had previously worked as Task Force Officer with the DEA as well.

Lane submitted an affidavit in support of his request for a warrant to search Ware's home. He did not present any witness in support of the warrant request. Instead, a state court judge signed the proposed warrant after meeting Lane and another officer at a restaurant and reviewing the afidavit. Lane executed the search on February 6, 2019, and recovered over five kilograms of cocaine, 86 grams of cocaine base, two handguns, two shotguns, a digital scale, and about $200,000.

The recovered evidence provided a basis for federal charges, and Ware ended up pleading guilty to possessing the drugs with intent to distribute, 21 U.S.C.§841(a)(1) (Counts 1 and2), and being a felon in possession of the firearms, 18 U.S.C.§922(g)(1)(Count 4), which were possessed in furtherance of a drugtrafficking crime, 18 U.S.C.§924(c) (Count 3). He was sentenced to 15 years in prison, the minimum permitted by law. With the government's consent, he reserved the right to appeal the denial of his motion to suppress the evidence derived from the search.

Ware's motion to suppress. Ware moved to suppress the items recovered from his house pursuant to the search warrant. He argued that the warrant had not been supported by probable cause as required by the Fourth Amendment. Indeed, the warrant was so deficient that its fruits should be suppressed notwithstanding the good-faith exception to the exclusionary rule of United States v Leon, 468 U.S. 897 (1984). The government

argued that probable cause supported the warrant and, in any event, Lane could have relied on the warrant in good faith, so the evidence should not be suppressed.

The district court denied the motion. It had held a hearing on the constitutionality of the traffic stop, but it determined it did not need to hear evidence concerning the sufficiency of Lane's affidavit.

A "shoddy affidavit" saved by Leon. The court did not detail the deficiencies with the probable cause affidavit, instead chastising Lane for failing to heed the Seventh Circuit's exhortation from Thompson, 801 F.3d. at 849, to improve the quality of his affidavits. "That warning was not heeded. The application for a search warrant Lane submitted in this case bears similar hallmarks of insufficiency to those identified in Thompson, suggesting Lane may not have recognized the jeopardy in which he places cases by submitting shoddy affidavits. Like the Seventh Circuit, this Court is not inclined to let the errors slide."

Bottom line: "this warrant application was done without the due care that ought to accompany the process of obtaining a search warrant." "[I]f Lane continues this slipshod approach to seeking search warrants, unconstitutional invasions of privacy and exclusion of evidence will eventually occur." Exclusion of evidence was inappropriate here, though. The court sent a copy of its order to the state court that issued the warrant and Peoria's Chief of Police in the hopes that "important lessons can be learned" even in the absence of

an order suppressing the evidence.

REASONS FOR GRANTING CERTIORARI

I. WRIT OF CERTIORARI STAGE BRIEF

A. Laws Governing Review

The considerations governing review by the Supreme Court of the United States on a petition for writ of certiorari are set forth in Rule 10 of the Rules of the Supreme Court of the United States. Under Supreme Court Rule 10, on principle purpose of the Court's certiorari jurisdiction is to grant certiorari to review the decision of a United States Court of Appeals when that decision raises an important matter that was decided in a manner that conflicts with the decisions of other United States Court of Appeals or that raises an important federal issue that was decided in a manner that conflicts with the decision of a State's highest court on the same federal issue. Federal circuit court decision is so out of line with normal judicial standards, that Supreme Court should exercise its supervisory power to instruct lower courts. The Supreme Court will be more favorably disposed to grant certiorari to review the decision of a United States Court of Appeals if it "has so departed from the accepted and usual course of judicial proceedings or sanctioned such a departure by a lower court, as to call for an exercise of [the Supreme] Court's supervisory power. The Court has used its supervisory power over the federal judiciary to grant certiorari in a wide variety of cases. The Court has granted

certiorari to instruct the lower federal court on proper procedure in criminal cases. McNabb v United States, 318 U.S. 332, 340-41, 63 S.Ct. 608, 87 L.Ed. 819 (1943).

B. Rules Governing Certiorari Stage Brief

Preparing and filing a petition for certiorari is very different task than preparing a petition at the certiorari stage. The United States Supreme Court accepts only between one and three percent of petitions for certiorari. The chances of obtaining certiorari improve dramatically when a petitioner hires an extremely experienced Supreme Court practitioner to craft a petition for certiorari. Here, petitioner reminds the Court that he is neither an trained attorney nor an expirenced Supreme Court practitioner, and he is proceeding in this matter pro se. The chances of obtaining certiorari are measurably improved when a petitioner emphasizes "certworthy" aspects of the decision below, such as, the presence of a circuit conflict or the national importance of an issue, rather than their legal or factual arguments on the merits. Practice guides and other secondary sources recommend that petitioners specifically avoid describing the merits of a case in too great detail, so as to dissuade the Court from perceiving the certiorari petition merely as a request for "error correction." The most helpful and persuasive petitions for certiorari to the Court usually present only one or two issues, and spend a considerable amount of time explaining why their questions of law have sweeping importance and divided or confused other courts. Given the page limitations that we impose, a litigant cannot

write such a petition if he decides, or is required, to raise every claim that might possibility warrant reversal in his particular case. It comes as no surprise, then, that parties do not - indeed, should not - fully develop their merits argument in certiorari stage briefing. Visciotti v Martel, 862 F.2d. 749, 773 (9th. Cir. 2017). Informed by the advice provided in Visciotti, the petitioner argues that his certiorari stage brief is less about the merits of his legal or factual arguments, and more a matter of certworthy aspects of the United States Court of Appeals for the Seventh Circuit's decision in his case. He request that the Supreme Court of the United States construe his pleadings liberally as required under Haines v Kerner, 404 U.S. 519, 30 L.Ed.2d. 652 (1972).

II. The Cost Benefit Analysis Underlying Leon, Herring And Davis

The legal principles that govern the exclusionary rule of the Fourth Amendment have been well established by the Supreme Court in United States v Leon, 468 U.S. 896, 104 S.Ct. 3405, 82 L.Ed.2d. 677 (1984). The Supreme Court has expanded the reach of Leon in Herring v United States, 555 U.S. 135, 144, 129 S.Ct. 695, 172 L.Ed.2d. 496 (2009), and Davis v United States, 564 U.S. 229, 236, 131 S.Ct. 2419, 180 L.Ed.2d. 285 (2011). In Leon the exclusionary rule applied to search warrants later deemed to be invalid. In Herring the exclusionary rule was expanded to apply to police bookkeeping error by personnel of the police department. In Davis the exclusionary rule was expanded to police reliance on binding judicial precedent that was later overruled. No Court has confronted an issue very similar to the one the petitioner presents and the Supreme Court has not articulated how a court should qualify the social cost of excluding evidence in a particular case.

The petitioner argues that the Seventh Circuit panel decision's application of the good faith exception to preclude suppression in this case is a departure from the Supreme Court's exclusionary rule precedents and represents a new free-standing exception never sanctioned by the Supreme Court or by precedent in the Seventh Circuit.

The petitioner request to have his case reviewed because although the Supreme Court has rendered an opinion on the subject

of remedial objective, the Court has not laid out a rule for courts to follow that reflects the broad "cost benefit analysis" that underlies the Leon, Herring, Davis holdings.

III. Why the Phrase Recurring or Systemic Negligence Confuses courts.

Petitioner argues that there has been significant confusion amoung courts regarding the interplay between Leon, Herring and Davis, and limitations on the good faith exception. The issue that confuses courts is what the Supreme Court had in mind when it speaks of "recurring or systemic negligence." The necessity and importance for providing such guidance on the issue was eloquently articulated by then Judge (now Justice Gorsuch in his dissent against the case of United States v Nicholson, 721 F.3d. 1236 (10th. Cir. 2013), where Judge Gorsuch noted that the Supreme Court offered a principled was to consider the degrees of deterrable culpability. If Judge Gorsuch's dissent is not a clear endorsement that this area of jurisprudence has not been entirely consistent and requires the resolution of the Supreme Court to help clarify this area of law, nothing is.

In order to demonstrate the confusion, petitioner argues that, notwithstanding the broad language in Leon, Herring, and Davis, some lower courts have tended to apply these decisions narrowly. See, United States v Rush, 808 F.3d. 1007, 1010 (4th. Cir. 2015); United States v Washington, 573 F.3d. 279, 289 (6th. Cir. 2009). Herring itself is not entirely clear on what role the subjective mental state of law enforcement should play in determining whether good faith exception should apply. At one point the Herring Court stated that, "[t]he pertinet analysis of deterrence and culpability is objective, not an inquiry into

the subjective awareness of arresting officers.

IV. The Lower Courts and the Leon, Herring, Davis Rule

The legal principles that govern the "good faith" exception rule have been evolving since Leon, and application of the exclusionary rule, which forbids the use of unlawfully obtained evidence at trial, depends on weighing the costs and benefits in each case. Its benefit is deterring police misconduct, Leon, 468 U.S. at 916: but on the cost side of the ledger, "[e]xclusion exacts a heavy toll on both the judicial system and society at large," as it often "suppress[es] the truth" and risks "set[ting] the criminal loose in the community without punishment," Davis, 131 S.Ct. at 2427. Thus, exclusion is the option of "last resort," but it tends to be merited when police exhibit "deliberate, reckless, or grossly negligent disregard for Fourth Amendment rights." Id., or if a constitutional violation is the product of recurring or systemic negligence." Davis, 564 U.S. at 236-40.

In determining the deterrable police misconduct's affect on the "societal cost benefit" test, petitioner believes that the District of New Mexico in United States v Loera, 59 F.Supp. 3d. 1089 (D.N.M. 2014) provides an persuasive perspective: "[I]t may be tempting to want to balance the severity of the crime in determining whether the good-faith exception applies - to consider, for example, that exclusion may be less appropriate where the unlawful search and seizure uncovers evidence of a serious crime--like officers discovering a group of severed heads in a suspect's home--than where the unlawful search and seizure uncovers evidence of a minor crime--like a joint of

marijuana in a teenager's pocket. The Court has been unable to find, however, a case in which a court has considered this factor in its good faith analysis. In the Court's view, that an act has been criminalized reflects the political process' determination of the cost of such behavior to society, and the courts should be reluctant to second guess that determination with its own ad hoc, personal preferences and individualized determination of the severity of the crime. The Court is also concerned that: (i) it would be difficult how to gauge the seriousness of an offense; (ii) it would be difficult to figure out how to factor this determination into the balancing test: (iii) weighing the seriousness of an offense may encourage law enforcement officiers to conduct illegal search and seizures while investigating serious crimes: and (iv) the balancing test should consider only the change in probability of conviction, not the convictions' consequences, because sentencing--which is kept strictly from the guilt/innocence determination in our system--incorporates the severity of the crime...the Fourth Amendment analysis should be the same, whether the crime includes murder, illegal re-entry, drugs, firearms, or...Likewise, the exclusionary rule analysis should be the same for every crime. Once the political branches have said something is a crime, the courts should not choose whether to apply the exclusionary rule depending on the crime. Social cost, as the Supreme Court uses the term, should mean something else." United States v Loera, 59 F.Supp.3d. 1089, 1194 n.16 (D.N.M. 2014).

V. Judge Gorsuch and the Leon, Herring and Davis Rule

Whether suppression is the right remedy in any particular case requires, the Supreme Court has said, an assessment of the competing social costs and benefits associated with exclusion. Judge (now Justice) Gorsuch explained in United States v Nicholson, 721 F.3d. 1236 (10th. Cir. 2013) that "[t]rying to administer this cost-benefit task is difficult under the best of circumstances. To do this, Judge Gorsuch proposed the following: "[I]n deciding whether to impose exclusion, courts must 'weigh' or 'compare' incommensurate goods (the deterrence benefits associated with suppression) and costs (the losses to society as a result of allowing criminal conduct to go unpunished) "a challenge akin to 'comparing constitutional apples with constitutional oranges.'" "A challenge made all the more complex by the grand societal scale on which the measurement is supposed to take place. Trying to administer the cost-benefit analysis without the benefit of the district court's factual finding on the relevant question makes a tough task tougher still. At this point, Judge Gorsuch explained, we don't have any factual finding about how deterrable Officer Baker's mistake prove to be. We don't know if the Officer stopped Nicholson because he lazily assumed the law must preclude the maneuver, because he diligently studied what was (incorrectly) taught at the police academy, or because he took his own best shot at reading the left-turn statute. Because we don't know the relevant facts, we can't meaningfully assess the risk that failing to exclude here would encourage

other officer mistakes of law-the likelihood that failing to exclude, in other words, would invite moral hazard. Neither do we have a full picture of the societal costs that might or might not be associated with exclusion in this case." Id.

Petitioner argues that this fear Judge Gorsuch posits is exactly what has materialized in his case.

Justice Breyer noted in dissent that the majority's mandate that courts focus on police culpability will effect "a very large number of cases, potentially many thousands each year." Id. at 2439-40 (Breyer, J., dissenting). "Ultimately, '[T]he Supreme Court in Davis...engaged in a cost-benefit analysis and effectively directed lower courts to do likewise in the developing case law." United States v Baez, 878 F. Supp. 2d 288 (D. Mass 2012)

Here, petitioner believes that this is "one of those unusual cases in which exclusion will further the purpose of the exclusionary rule because the affiant had been repeatedly warned not to submit deficient affidavits but continued to commit the same errors that would have borne negatively in the government's analysis had it been excluded.

VI. Circumstances Too Distinguishable To Create Circuit Split

Petitioner argues that the Tenth Circuit decision in United States v Nicholson, 721 F.3d. 1236 (10th. Cir. 2013) is too distinguishable from his case to create a circuit split on the thinnest of grounds. The functional posture of both cases is the same: interpretation of a left-turn state traffic ordinance and an interpretation of a right-turn state traffic ordinance, and a search and seizure. The only difference, in the petitioner's opinion, is that the Nicholson case is more detailed and litigious. The Judge Gorsuch dissent shows room for reasonable disagreement on how the Supreme Court meant courts to analyze the cost benefit of exclusion of evidence. The lower courts are not consistent in their discussion and application of the cost benefit analysis issue, and there are more than two sides of the issue. Problem is that the circumstances vary widely, and there is no simply stated rule that neatly resolves all problems. Attempts to reason from the few arguable relevant cases are hopelessly inconclusive. For example, petitioner's case is about an affiant who has been repeatedly warned not to submit deficient affidavits but continues to commit the same errors. This case is precisely the type of scenario Judge Gorsuch envisioned above but the Seventh Circuit fails to appreciate. The petitioner's case involves errors the police themselves are ultimately responsible for that the exclusionary rule seeks to deter, and the Supreme Court should review.

VII. The Collateral Importance of Resolution

Petitioner believes that the collateral importance of resolution in this case is to put an end to the idea that an African-American's failure to give a proper turn signal or violation of some traffic law can provide police officers with justification to detain and obtain a search warrant based on experience alone is just a fact of life meant to internalize racial odedience toward, and fear of being stopped by police for "driving while black." He argues that it is the express policy of the Peoria Police Department to stop, detain, search, and issue traffic tickets to African-Americans traveling on the streets and highways on the basis of race without sufficient cause and justification for the purpose of internalizing racial obedience toward, and fear of police. In fact, according to Illinois Department of Transportation (IDOT) data 26% of the vehicle search events involve African-American drivers and passengers. For context, there are approximately 168,000 people living in Peoria, Illinois of which about 30,000 are African-American. This means that even though African-American make up only 18% of the total population in Peoria, they account for about 26% of vehicle search events. This disproportionately number of African-American Peoria resident being subjected to this racial profiling harms them in a number of ways.

The phenomeonon of "driving while black" was a type of racial profiling used predominantly in the late 1990's and early 2000s that often resulted in the unlawful and unconstitutional

search of black men and contributed to the racial disparity of the federal prison population. "As applied to moving traffic violations, Fourth Amendment doctrine has evolved in recent decades to give police officers so much discretion, including the power to conduct pretextual traffic stops, that some scholars have described this power as the "twenteith-century version of the general warrant." Sarah A. Seo., The New Public, 125 Yale L.J. 1616, 1669 (2016); See also, Barbara C. Salken, The General Warrant of the Twentieth Century? A Fourth Amendment Solution to Unchecked Discretion to Arrest for Traffic Offenses, 62 Temple L. Rev. 221 (1989)(written before the most dramatic expansions of this discretion). The doctrinal evolution has enabled stops for what is often called "driving while black." "The stories, The Statistics, and the Law: Why 'Driving While Black' matters. 84 Minn L. Rev. 265, 273-75, 288-89 (1999)("To cope, African-Americans often make adjustments in their daily activities. They avoid certain places where they think police will 'look' for Blacks. Some drive bland cars...Some change the way they dress. Others who drive long distances even factor in extra time for the inevitable traffic stops they will face.") Michelle Alexander, The New Jim Crow 122 (2010)(noting that in certain areas, young black people are stopped and searched so frequently by the police that they "automatically 'assume the position [; placing [their] hands up against the car and spreading [their] legs to be searched] when a patrol car pulls

up, knowing full well that they will be detained and frisked no matter what."). Here, petitioner argues that Peoria police officers take advantage of the fact that the Fourth Amendment allows pretextual stops so long as they are based upon an observed violation of a traffic law.

The collateral effect of "driving while black" phenomenon and the racial profiling practice is that other Peoria government agencies feed off the way in which African-American residents are being mistreated by police. According to CENTRALILLINOISPROUD.COM, the City of Peoria, Illinois has averaged 21 murders per year for the past 3 years. In 2019 Peoria had 25 murders, 14 murders in 2020, and 26 murders in 2021. The average age of the homicide victim was 30 years old.

The percentage of incarcerated black men has increased from 2% in 1970 to 8% in 2014. The percentage of unemployed black men increased from 8% in 1970 to 16% in 2014. The percentage of black men unemployed but looking for employment increased from 7% in 1970 to 11% in 2014.

Petitioner believes that properties in majority African-American neighborhoods were more likely to be deemed nuisances that properties in majority white neighborhoods. He believes these types of selective discrimination, racial profiling, and increased policing in African-American communites has a devastating effect on black men, their families, and their communites for the past several hundred years and it seems that unless the judiciary does something to help it will continue indefinitely.

CONCLUSION

Justice Breyer, in Davis v United States, 564 U.S. 229, noted in dissent, that the majority's mandate that courts focus on police culpability will effect "a very large number of cases, potentially many thousands each year." Id. at 2439-40 (Breyer, J., dissenting). Ultimately, "[t]he Supreme Court in Davis... engaged in a cost-benefit analysis and effectively directed lower courts to do likewise in the developing case law." Id.

Petitioner argues that resolution of the questions he advances in this case turns, in part, on the answer to what the Supreme Court had in mind when it uses the phrase "recurring or systemic negligence." The Leon, Herring or Davis Courts have not clearly established what the Supreme Court had in mind when it uses the phrase "recurring or systemic negligence. Thus, reasonable jurists can disagree regarding whether an affiant who had been repeatedly warned not to submit deficient affidavits but continue to commit the same errors is exhibiting "good faith."

WHEREFORE, for the above and foregoing reasons the Court should consider petitioner's certiorari stage brief and grant certiorari for reasons consistent with the above.

Respectfully submitted this 5th day of January, 2022.

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