

21-8037

No. _____

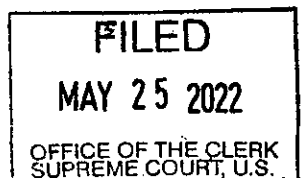
ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

LARRY BLAKNEY #34750171 PRO-SE — PETITIONER
(Your Name)

vs.
SLED, HARTSVILLE S.C. POLICE DEPARTMENT,
UNITED STATES OF AMERICA ET AL — RESPONDENT(S)



ON PETITION FOR A WRIT OF CERTIORARI TO

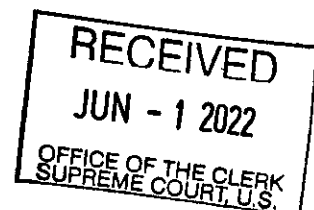
UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

LARRY BLAKNEY #34750171
(Your Name) FEDERAL MEDICAL CENTER
F.M.C. OF BUTNER N.C.
P.O. BOX 1600
(Address)

BUTNER N.C. 27509
(City, State, Zip Code)

(Phone Number)



QUESTION(S) PRESENTED

- (1) WHY ARE THE COMPLEX WARDEN T. SCARANTINO ALLOWING THE PETITIONER LARRY BLANKNEY TO BE ELECTRONICALLY SURVEILLANCE THROUGH AN ILLEGAL INTERCEPTION AT THE FEDERAL MEDICAL OF BUTNER N.C. BEING TO THE FACT THAT HE'S THE KEEPER OF THE PRISON, INSTEAD OF HIM STOPPING THE HARTSVILLE S.C. POLICE AND THE COURT THAT'S AUTHORIZING THE SURVEILLANCE IN PURSUANT TO RULE 41 AND 50 U.S.C. § 1801; 18 U.S.C. § 2510; 18 U.S.C. § 3132; 18 U.S.C. § 3701 HE'S AIDING AND ABETTING BY ALLOWING THE ILLEGAL ELECTRONIC SURVEILLANCE TO TAKE PLACE FOR ALL THE UNLAWFUL REASONS MENTIONED IN THE STATEMENT OF THE CASE
- 2) WHY ARE HARTSVILLE S.C. POLICE OFFICERS, THE COURT AND THE COMPLEX WARDEN NOT SAFEGUARDING THE RIGHTS OF THE PETITIONER AND ALLOWING THE CONSTITUTIONAL DEPRIVATION TO TAKE PLACE AND THE STATUTES AND LAWS TO BE VIOLATED WILLFULLY THROUGH THE ELECTRONIC SURVEILLANCE THAT VIOLATING THE REASONABLE EXPECTATION OF PRIVACY AND UNREASONABLE SEARCHES AND SEIZURES THATS SAFEGUARDED BY THE RIGHTS OF FOURTH AND FOURTEENTH AMENDMENT TO THE CONSTITUTION SEE *BERGER V. NEW*, 388, U.S. 41, 51, 87 S. Ct. 1875, 18 L. Ed 1040 (1967) (PET. 5)
- 3) WHY ARE THE COURT AND THE HARTSVILLE S.C. POLICE ALLOWING THE PETITIONER TO BE WATCHED AND SURVEILLANCE IN HIS CELL (HOUSING) AREA WHERE HE HAVE A REASONABLE EXPECTATION OF PRIVACY AND IS BEING WATCHED AS HE DEFECATE AND URINATE EXPOSING HIS GENITAL AND ANAL AREA. SEE *UNITED STATES V. KNEE SOO LEE*, 898 F.2d 1084, 1088 (5th Cir. 1990) QUOTING *RAKAS* 439 U.S. AT 415 THE CONTEXT OF THE FOURTH AMENDMENT AN UNLAWFUL SURVEILLANCE IS THE SAME AS A UNREASONABLE SEARCH AND SEIZURE. WHY ARE THEY NOT SAFEGUARDING THE PETITIONER RIGHTS AS REQUIRED BY THE DUE PROCESS OF THE FOURTEENTH AMENDMENT OF THE UNITED STATES CONSTITUTION AND THE REGULATION OF THE PRISON. SEE *BEIL V. WOLFISH* 441, U.S. 520, 559, 49 S. Ct. 1861, 60 L. Ed 447 (1987) (PET. 5-6)

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:

SLED (S.C. LAW ENFORCEMENT DIVISION)
THE HARTSVILLE S.C. POLICE DEPARTMENT
185 WEST CAROLINA AVENUE
HARTSVILLE S.C. 29550

THE UNITED STATES OF AMERICA
T. SCARANTINO, COMPLEX WARDEN
FEDERAL MEDICAL CENTER
P.O. BOX 1600
BUTNER N.C. 27509

DEPARTMENT OF JUSTICE AM#5616
950 PENNSYLVANIA AVENUE N.W.
WASHINGTON D.C. 20530-0004

RELATED CASES

LARRY BLAKNEY V. S.C. LAW ENFORCEMENT DIVISION NO. 5:21-CV-03080-M
U.S. DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA
(WESTERN DIVISION) JUDGMENT ENTERED FEBRUARY 24, 2022

LARRY BLAKNEY V. S.C. LAW ENFORCEMENT DIVISION NO. 22-6293, U.S.
COURT OF APPEALS FOR THE FOURTH CIRCUIT

TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

SEE CHEMICAL WASTE MGMT. INC. V. HUNT, 504 U.S. 334, 339, 112 S. Ct. 2009, 119 L. Ed. 2d. 121 (1992) (CERTIORARI GRANTED BECAUSE OF THE IMPORTANCE OF THE FEDERAL QUESTION AND THE LIKELIHOOD THAT IT HAD BEEN DECIDED IN A WAY CONFLICTING WITH APPLICABLE "DECISIONS" OF THE COURT) ALSO SEE C.J. GERTZ V. WELCH, 418 U.S. 829, 835, 94 S. Ct. 2997, 41 L. Ed. 2d. 799 (1974) (CERTIORARI GRANTED TO RECONSIDER PUBLISHER'S CONSTITUTIONAL PRIVILEGE SINCE "COURT HAS STRUGGLED FOR NEARLY A DECADE TO DEFINE THE PROPER ACCOMMODATION BETWEEN THE LAW OF DEFAMATION AND THE FREEDOM OF SPEECH AND PRESS") ALSO. SEE MIRANDA V. ARIZONA, 384 U.S. 436, 441-442, 86 S. Ct. 1602 (1966) (CERTIORARI GRANTED "IN ORDER FURTHER TO EXPLORE SOME FACETS OF THE PROBLEMS. ALSO SEE UNITED STATES V. DEONISIO, 410 U.S. 1, 5, 93 S. Ct. 764, 35 L. Ed. 2d 67 (1973) ("IN VIEW OF A CLEAR CONFLICT" COURT GRANTED CERTIORARI) SEE CUYLER V. ADAMS, 449 U.S. 433, 435 101 S. Ct. 705, 66 L. Ed. 2d 641 (1981) CERTIORARI GRANTED TO RESOLVE CONFLICT AMONG CIRCUITS AND STATE COURTS OVER PROPER INTERPRETATION OF INTERSTATE AGREEMENT ON DETAINERS

STATUTES AND RULES

28 U.S.C. § 2101(F) SEE SUP. CT. R. 23.2 (APPLICATION TO JUSTICE MAY BE PRESENTED BY "PARTY TO A JUDGEMENT SOUGHT TO BE REVIEWED") CITING 28 U.S.C. § 2101(F) ALSO SEE SUP. CT. R. 23.1 (A STAY MAY BE GRANTED BY JUSTICE) SUP. CT. R. 10 AND 20.1 (ARE ENTIRELY "CONSISTENT WITH ACTS OF CONGRESS SEE "28 U.S.C. § 2071, RULE 10 EMBODIES THE STANDARDS BY DISCRETION TO GRANT THE REVIEW, ALSO SEE 28 U.S.C. § 1651(a) (2000) (STATING THAT THE SUPREME COURT AND ALL COURTS ESTABLISHED BY ACT OF CONGRESS MAY ISSUE ALL WRITS NECESSARY OR APPROPRIATE IN AND OF THEIR RESPECTIVE JURISDICTIONS AND APPEALABLE TO THE USAGES OF PRINCIPLES OF LAW)

OTHER

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 - U.S. COURT OF APPEALS 4TH CIRCUIT (RECORDS)

APPENDIX B MOTION TO RECUSE AND DISQUALIFY (28 U.S.C. § 144; 455)
ALONG WITH MEMORANDUM AND AFFIDAVIT

APPENDIX C - PETITION FOR REHEARING (FED. R. APP. P. 35(b)(1))

APPENDIX D - APPLICATION UNDER RULE 25(c) FOR LEAVE TO APPEAL CLASS
CERTIFICATION OF DISTRICT COURT

APPENDIX E - PETITION FOR LEAVE TO APPEAL FROM INTERLOCUTORY ORDER

APPENDIX F - THE UNITED STATES DISTRICT COURT FOR THE EASTERN
DISTRICT OF NORTH CAROLINA (WESTERN DIVISION)
ORDER

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 _____ 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 _____ to the petition and is

☐ reported at _____; or,

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

☐ is unpublished.

The opinion of the _____ court appears at Appendix _____ to the petition and is

☐ reported at _____; or,

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

☐ is unpublished.

JURISDICTION

☐ For cases from federal courts:

The date on which the United States Court of Appeals decided my case was FILED MAY 5, 2022.

☐ 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 A₁.

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

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

☐ For cases from state courts:

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

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

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

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

THE CONSTITUTIONAL DEPRIVATION THAT'S TAKING IN THIS MATTER IS THE FOURTH AMENDMENT TO THE UNITED STATES CONSTITUTION (REASONABLE EXPECTATION OF PRIVACY AND RIGHT AGAINST UNREASONABLE SEARCHES AND SEIZURES WHICH IN THE CONTEXT OF THE FOURTH AMENDMENT IS THE SAME AS A ILLEGAL AND UNLAWFUL SURVEILLANCE IN A LOCATION WHERE THE INDIVIDUAL ARE INDIVIDUALS HAVE A REASONABLE EXPECTATION OF PRIVACY IN THEIR HOUSE (JAIL CELL) PERSONS, PAPERS AND EFFECTS. SEE UNITED STATES V. KYLE SOO LEE, 898 F.2d 1084, 1088 (5TH CIR. 1990) QUOTING RAKAS 439 U.S. AT 143) THE STATUTORY PROVISIONS INVOLVED ARE 50 U.S.C. § 1801 (FISA); 18 U.S.C. § 2510 (EAVESDROPS); 18 U.S.C. § 2518 (TITLE III); 18 U.S.C. § 3132; AND 18 U.S.C. § 2701 (WIRETAPS TRAP & TRACE) IN PURSUANT TO RULE 41(b) AND AUTHORIZED IN PURSUANT TO 18 U.S.C. § 2516 AND CAN BE REVIEWED IN PURSUANT TO 50 U.S.C. § 1803(b). SEE BERGER V. NEW YORK, 388 U.S. 41, 51, 87 S. CT. 1873, 18 L. ED. 1040 (1967) THERE'RE ALSO CONSTITUTIONAL DEPRIVATIONS OF THE FOURTEENTH AMENDMENT (DUE PROCESS CLAUSE AND EQUAL PROTECTION OF THE LAWS) INVOLVED WITH THE PRISON CONFINEMENT AND THE REGULATIONS THERE OF. SEE BEIL V. WOLFISH 441 U.S. 520, 99 S. CT. 1861, 60 L. ED. 2d 447 (1979) (STATES THE SUPREME COURT HAS CONFIRMED THE IMPORTANCE OF DEFERENCE TO CORRECTIONAL OFFICIALS AND EXPAINED THAT A REGULATION IMPINGING ON AN INMATE'S CONSTITUTIONAL RIGHTS MUST BE UPHOLD "IF IT IS LEGITIMATE PENOLOGICAL INTEREST" WE'RE BEING ALLOWED TO BE SURVEILLANCE BY THE AUTHORIZATION OF THE U.S. DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA (WESTERN DIVISION) BY THE HARTSVILLE S.C. POLICE OF THE S.C. LAW ENFORCEMENT DIVISION AS THEY INVESTIGATE PETITIONER LARRY BRYKNEY, THEY'RE WATCHING ALL OF US AS WE SHOWER AND ARE IN THE NUDE, THEY'RE ALSO USING THE ELECTRONIC SURVEILLANCE TO WATCH THE PETITIONER IN HIS CELL (HOUSING AREA) IN WHICH HE HAVE A TOILET AND IS BEING ALLOWED TO BE WATCH AS HE URINATE AND DEFECATE AND EXPOSE HIS GENTIAN AND ANAL SECTION. OUT OF MALICE AND EN-VIL FEELINGS TOWARD THE PETITIONER (CONSTITUTIONAL ACTUAL MALICE RULE) THEY'RE BROADCASTING LIES AND PER-SE DEFAMATION OUT OF FAISITH WITH LECKLESS DISREGARD OF THE TRUTH ABOUT THE PETITIONER KILLING SOMEONE HE DIDN'T KILLED AND USING DRUGS THAT HE DON'T USE OUT OF MALICE

STATEMENT OF THE CASE

THE U.S. DISTRICT COURT OF THE EASTERN DISTRICT OF NORTH CAROLINA (WESTERN DIVISION) HAVE BEEN SINCE SEPT. 16, 2020 AND STILL ARE AUTHORIZING AN ELECTRONIC SURVEILLANCE FOR INVESTIGATIVE PURPOSES ON THE PETITIONER LARRY BLAKNEY FOR THE HARTSVILLE S.C. POLICE DEPT. OF THE S.C. LAW ENFORCEMENT DIVISION. THE PETITIONER IS ORIGINALLY FROM HARTSVILLE S.C. AND IS BEING WATCHED AT THE F.M.C. BY THE POLICE AND PEOPLE OF THE GENERAL PUBLIC OF HARTSVILLE THROUGH THE ELECTRONIC AND COMMUNICATION SURVEILLANCE AND DEVICES WERE BEING WATCH IN LOCATION WHERE WE HAVE A EXPECTATION OF PRIVACY LIKE THE SHOWER AS WE GET NUDE, THEY'RE EVEN ALLOWING THE PETITIONER LARRY BLAKNEY TO BE WATCHED IN HIS JAIL CELLS WHERE HE USE THE TOILET AND EXPOSE HIS GENTAIL AND ANNI SECTION. SEE *RAKAS V. ILLINOIS*, 489 U.S. 128, 99 S. Ct. 41, 58 L. Ed. 2d. 387 (1978) CITING *SCHMERBER V. CALIFORNIA*, 384 U.S. 957 (1966) IN VIOLATION OF THE FOURTH AMENDMENT OF PRIVACY AND UNREASONABLE SEARCHES AND SEIZURES IN THE CONTEXT OF THE AMENDMENT IS THE SAME AN ILLEGAL AND UNLAWFUL ELECTRONIC SURVEILLANCE. SEE *UNITED STATES V. RAMSEY*, 431 U.S. 606 (1977) THE COURT IS ALLOWING THE HARTSVILLE S.C. POLICE AND THE PEOPLE OF THE GENERAL PUBLIC TO HARASS HIM, AND EXTORT HIM FOR INCRIMINATIVE PURPOSE OF TRYING TO CONVICT HIM FOR A MURDER THAT HE DID NOT COMMIT, THEY'RE FAIRLY ACCUSING HIM OF KILLING THE MOTHER OF JULIUS HATIERA KWA JU BIA JIBIANE WHOSE NAME WAS CYNTHIA BRUCE AND SHE WAS ACTUAL SHOT AND KILLED BY THIS GUY NAME ANTHONY MARTIN ON 8TH STREET IN THE CITY LIMITS OF HARTSVILLE S.C. IN 1994 IN WHICH IS A PER-SE DEFAMATION. SEE *ARMISTEAD V. MINOR*, 85 So. 2d. 1189, 1193 (MISS. 2002) CITING *FRANKLIN V. THOMPSON*, 722 So. 688, 691 (MISS.) THEY'RE EVEN ALLOWING THE MEDIA TO GATHER INFORMATION ABOUT THE SITUATION FOR MEDIA, EXPOSED THE WARDEN OF THE COMPLEX IS AIDING AND ABETTING BY ALLOWING THEM TO USE THE F.M.C. AS A VENUE, THEY'RE ALSO PAYING FOR RADIO ADVERTISEMENTS OF FAKE MISLEADING STATEMENTS ABOUT THE PETITIONER BEING A FAKE AND A CRACKHEAD OUT OF FAISITY WITH RECKLESS DISREGARD OF THE TRUTH. SEE *NEW YORK TIMES V. SULLIVAN*, 376 U.S. 254, 84 S. Ct. 710, 11 L. Ed. 2d. 686 (1964) CITING *DIBELLA V. HOPKINS*, 403 F. 2d. 102, 110 (2d Cir. 2005) THE PETITIONER LARRY BLAKNEY AKA GATE BIA PASTOR GATE IS BEING HARASSED AND EXTORTED BY THE HARTSVILLE S.C. POLICE AND THE PEOPLE OF THE PUBLIC OF HARTSVILLE S.C. ABOUT HIS YOUTH MINISTERS AND INDEPENDANT RECORD LABEL "GATE MOVEMENT RECORDS" THAT HE DISPLAY ON FACEBOOK ITS ALL CHRISTIAN BASE AND A PART OF HIS RELIGION AND SAFEGUARDED BY THE FIRST AMENDMENT (FREEDOM OF RELIGION AND ESTABLISHMENT CLAUSE) THE FOURTEENTH AMENDMENT AS WELL. THE POLICE OF HARTSVILLE S.C. IS TRYING TO MAKE HIM REMOVE HIS RELIGIOUS ACTIVITIES FROM HIS FACEBOOK PAGE AGAINST THOSE CONSTITUTIONS, THROUGH THE ELECTRONIC COMMUNICATION AS WELL. SEE *MURPHY V. MISSOURI DEPT OF CORRECTIONS* 372 F. 3d 479 (8TH Cir. 2004) THEY'RE EVEN SPREADING SHANDER ABOUT THEM DONT LIKE THE WAY THE PLAINTIFF FOR PETITIONER LOOK OUT OF MATEE AND ILL WILL FEELINGS TOWARD THE PETITIONER THROUGH RADIO AND T.V PER-SE DEFAMATIONS AND PER-SE LIBELS OUT OF MATEE

REASONS FOR GRANTING THE PETITION

CONGRESS HAS EXPRESSLY DELINEATED THE DISCRETIONARY NATURE OF PETITIONS FOR WRITS OF CERTIORARI AND MANDAMUS PRESENTED TO THE SUPREME COURT, 28 U.S.C. § 1254 (2000) STATING THAT CASES IN THE COURTS OF APPEALS MAY BE REVIEWED BY THE SUPREME COURT BY WRIT OF CERTIORARI (GRANTED UPON THE PETITION OF ANY PARTY TO ANY CIVIL OR CRIMINAL CASES) (EMPHASIS ADDED); 28 U.S.C. § 1651 (A) (2000) (STATING THAT THE SUPREME COURT AND ALL COURTS ESTABLISHED BY ACT OF CONGRESS MAY ISSUE ALL WRITS NECESSARY OR APPROPRIATE IN AID OF THEIR RESPECTIVE JURISDICTIONS AND AGREEABLE TO THE USAGES AND PRINCIPLES OF LAW (EMPHASIS ADDED)); SEE ALSO, DURHAM V. UNITED STATES, 401 U.S. 481, 488, 91 S. CT. 858, 28 L. ED. 2D. 200N* (1971) (CONSERVING THAT APPEALS (TO CIRCUIT COURTS OF APPEAL) ARE A MATTER OF RIGHT WHILE (THE SUPREME COURT'S) DECISIONS ON CERTIORARI (AND MANDAMUS) PETITIONS ARE WHOLLY DISCRETIONARY, THE PETITIONER LARRY BIAKNEY WAS GRANTED A TEMPORARY STAY OF MANDATE ON HIS PETITION FOR REHEARING EN BANC BY THE U.S. COURT OF APPEALS FOR THE FOURTH CIRCUIT, SEE, NEW YORK TIMES CO. V. JASCALEVICH, 489 U.S. 1317, 1318, 99 S. CT. 658 L. ED. 2D. 25 (1978) (STATED A STAY IS AUTHORIZED ONLY IF THE JUDGEMENT IS... SUBJECT TO REVIEW BY THE SUPREME COURT ON WRIT OF CERTIORARI. THE PETITIONER IS DEALING WITH CONSTITUTIONAL AND CIVIL RIGHTS ISSUES THAT NEED TO BE ADDRESSED IN THE PROPER JURISDICTION, SO THAT THE MATTER CAN BE RESOLVED, SEE UNITED STATES V. NIXON, 418 U.S. 683, 687, 94 S. CT. 3090, 41 L. ED. 2D 1039 (1974) (STATED CERTIORARI GRANTED BECAUSE OF PUBLIC IMPORTANCE OF ISSUES PRESENTED AND NEED FOR THEIR PROMPT RESOLUTION) ALSO SEE SUP. CT. R. 10 ("REVIEW ON WRIT OF CERTIORARI IS NOT A MATTER OF RIGHT, BUT OF JUDICIAL DISCRETION; THE PETITIONER IS SEEKING THE SUPREME COURT FOR THE IMPARTIAL DISCRETION THAT'S GUARANTEED BY DUE PROCESS AND JUST JUDICIAL DISCRETION. ACCORDINGLY, THE COURT CONCLUDES THAT SUPREME COURT RULES 10 AND 20 ARE ENTIRELY CONSISTENT WITH ACTS OF CONGRESS "28 U.S.C. § 2071 SEE DOVE V. UNITED STATES, 423 U.S. 325, 325, 96 S. CT. 579, 46 L. ED. 2D 531 (1976) THESE ARE THE REASONS SET FORTH FOR GRANTING THE PETITION FOR THE PETITIONER

IN 1964, THE UNITED STATES SUPREME COURT HELD THAT PRISONERS CAN
BEIN SUIT AGAINST THEIR KEEPERS UNDER THE CIVIL RIGHTS ACT. IN 1973,
IT FURTHER HELD THAT A § 1983 ACTION WAS A PROPER REMEDY FOR A PRISONER
TO MAKE A CONSTITUTIONAL CHALLENGE TO THE CONDITIONS OF HIS PRISON
LIFE, THE CONCLUSION OF THE MATTER SHOULD BE RESOLVED BY THE
CRITERIA OF THE REMEDY THAT READS AS WRITTEN BELOW:

EVERY PERSON WHO, UNDER COLOR OF ANY STATUTE, ORDINANCE, REGULATION,
CUSTOM, OR USAGE OF ANY STATE OR TERRITORY, 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 PARTY INJURED IN AN ACTION AT LAW, SUIT IN EQUITY, OR OTHER
PROPER PROCEEDING FOR REDRESS. IT IS FOR THESE REASON OF
SUBSTANTIVE AND PROCEDURE PURPOSES THE PETITION FOR WRIT
OF CERTIORARI SHOULD BE GRANTED

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

LARRY BLAKNEY

Date: 3/26/2022