No. _____

IN THE
Supreme Court of the United States

COURTNEY NEWMAN,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

On Petition for a Writ of Certiorari to the
United States Court of Appeals for the Sixth Circuit

PETITION FOR A WRIT OF CERTIORARI

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QUESTIONS PRESENTED

On October 17, 2022, this Court vacated Petitioner Newman's conviction in light of *Ruan v. United States*, 142 S. Ct. 2370, 213 L. Ed. 2d 706 (2022) and remanded for further proceedings. On remand, the Sixth Circuit agreed with the parties that *Ruan* applies to 21 U.S.C. § 856(a)(1) prosecutions, and also agreed that the jury instructions given were in error in light of *Ruan*. After determining that the District Court did not "spell out the "knowingly" *mens rea* standard required under *Ruan*, 142 S. Ct. at 2375, for the second element" the Sixth Circuit reasoned that by inserting the generic term "illegally" in the instruction, the jury instruction "made clear that the jury had to find that Defendants knowingly opened the clinics for the purpose of illegally distributing Schedule II controlled substances." Did the Sixth Circuit commit error by substituting the generic term "illegally" for the language mandated in *Ruan*?

Although no other district or circuit court has appeared to issue a ruling on 21 U.S.C. § 856(a)(1) under the *Ruan* standard, every court that has applied this Court's holding in *Ruan* to a prosecution under 21 U.S.C. § 841 has found that failing to give the *Ruan* instruction was plain error – but notably not the Sixth Circuit. Parting ways with other circuits handling of this issue, the Sixth Circuit determined that Ms. Newman could not meet the plain error standard. Is the Sixth Circuit's ruling in this case on the plain error of the instruction standard contrary to this Court's precedents, including *Ruan v. United States*, 142 S. Ct. 2370, 213 L. Ed. 2d 706 (2022) and *Henderson v. United States*, 568 U.S. 266, 133 S. Ct. 1121, 185 L. Ed. 2d 85 (2013)?

RELATED CASES

Pursuant to Supreme Court Rule 14.1(b)(iii), Petitioner submits the following Cases which are directly related to this Petition:

United States v. Sylvia Hofstetter

Sixth Circuit Case No. 20-6245 (decided August 29, 2023)

United States v. Cynthia Clemons

Sixth Circuit Case No. 20-6427 (decided August 29, 2023)

United States v. Holli Womack

Sixth Circuit Case No. 20-6426 (decided August 29, 2023)

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CITATIONS OF OFFICIAL AND UNOFFICIAL REPORTS OF OPINIONS AND ORDERS ENTERED IN THE CASE BY COURTS

The opinion of the United States Court of Appeals for the Sixth Circuit upon remand is published as *United States v. Hofstetter, et al.,* 80 F.4th 725 (6th Cir. 2023) and is attached hereto as Appendix A. This Court's decision to remand for further proceedings is published at 143 S.Ct. 250, and is attached hereto as Appendix B. The original decision of the Sixth Circuit is published as *United States v. Hofstetter, et al.*, 31 F.4th 396 (6th Cir. 2022) is attached hereto as Appendix C. The opinion of the District Court is attached hereto as Appendix D.

JURISDICTIONAL STATEMENT

Courtney Newman, the Petitioner, respectfully seeks this Court's review of the Sixth Circuit's decision in this case, which was entered on August 29, 2023. *United States v. Newman*, No. 20-6428 (6th Cir. August 29, 2023) (App. A). This Court has appellate jurisdiction pursuant to Article III, Section II of the United States Constitution and 28 U.S.C. § 1254(1). This criminal matter arises under the federal "crack house" statute, 21 U.S.C. § 856(a)(1).

STATUTORY PROVISIONS AT ISSUE

21 U.S.C. § 856(a) (1)

(a) Unlawful acts

Except as authorized by this subchapter, it shall be unlawful to—

(1) knowingly open, lease, rent, use, or maintain any place, whether permanently or temporarily, for the purposes of manufacturing, distributing, or using any controlled substance

……

Federal Rule of Criminal Rule 52 provides:

> (a) Harmless Error. Any error, defect, irregularity, or variance that does not affect substantial rights must be disregarded.
>
> (b) Plain Error. ***A plain error that affects substantial rights may be considered even though it was not brought to the court's attention***.

(emphasis added)

STATEMENT OF THE CASE

The federal "crack house" statute, 21 U.S.C. §856(a)(1), criminalizes persons who knowingly open, lease, rent, use, or maintain any place for the purpose manufacturing, distributing or using any controlled substance unless they are authorized to do so as set forth in Title 21, Section 13, Subchapter I.

At the time of the events described herein, Courtney Newman was a nurse practitioner licensed by the State of Tennessee who also possessed a valid registration with the Drug Enforcement Agency to prescribe controlled substances. Beginning on October 16, 2013, Courtney Newman began work as an independent contractor nurse practitioner for East Knoxville Healthcare Services ("EKHS") on Lovell Road[1] in Knoxville, Tennessee. EKHS was licensed to operate as a pain management clinic by the State of Tennessee and was regularly inspected by the Tennessee Department of Health. While working at the clinic, Ms. Newman prescribed certain controlled substances for the purpose which they had been approved for use by the Food and Drug Administration ("FDA") to patients that had come to the clinic complaining of chronic pain and who had provided radiological evidence of the source of that chronic pain, usually in the form of an MRI. Prescriptions were only issued after the patient had undergone a urine drug screen

[1] There were two other clinics involved in this case, one in Lenoir City, Tennessee, and another clinic located on Gallaher View Road in Knoxville, Tennessee. The Ebenezer Road clinic was shut down prior to the opening of the clinic located on Lovell Road. These clinics were owned by Sylvia Hofstetter and other partners. From the testimony at trial, Ms. Newman appears to have worked for one day at the clinic in Lenoir City and never worked at the Gallaher View Road clinic.

and an in-person examination. Each of Ms. Newman's patient exam charts was reviewed and approved by her supervising physician. Patients who exhibited drug seeking behavior, failed drug screens, had track marks or other indications of illegitimate use of the medications were discharged from the clinic by Ms. Newman and no adverse action was taken against her for discharging a patient. Ms. Newman's pay was based solely on the number of hours she worked at the clinic and was not impacted by the number of patients she examined, nor was there any financial incentive to write prescriptions. Ms. Newman worked at EKHS until March 27, 2014, a total of 86 days, until she left for a job with benefits..

Unbeknownst to Ms. Newman, an undercover investigation of that clinic was being conducted by local and federal law enforcement officials. Ms. Newman was not a subject of the investigation and never provided medical services to any of the undercover agents who visited the clinics. On March 15, 2015, approximately one year after Ms. Newman ceased working at the clinic, federal law enforcement raided EKHS and the Lenoir City clinic along with the residence of one of the owners of the clinic, Sylvia Hofstetter, two former employees of EKHS, and multiple patients and former patients of the clinics were arrested and indicted. On October 16, 2016, well over two years since Ms. Newman had worked at the clinic, a First Superseding Indictment was issued charging her and several other medical providers who had worked at EKHS with conspiracy to distribute controlled substances, distributing controlled substances and maintaining a drug related premises. There were three

subsequent superseding indictments issued with additional allegations against Ms. Newman and others, but with the same substantive charges.

After the Government's Fourth Superseding Indictment, a jury trial was held beginning in October, 2020 and continuing until late January, 2021. At the conclusion of the Government's proof, and again at the end of conclusion of all proof, Ms. Newman and the other co-defendants orally moved for an F.R.Cr.P 29 motion for judgment of acquittal, a ruling on which the district court reserved until a later date. On February 13, 2021, the jury returned a verdict finding Ms. Newman **not guilty** of the conspiracy to distribute controlled substances counts; **not guilty** of the substantive counts of distributing controlled substances; **not guilty** of maintaining a drug related premises relating to the Lenoir City clinic; but guilty of a single court of 21 U.S.C. §856(a)(1) maintaining a drug related premises related to the EKHS clinic. After the jury returned its verdict, Ms. Newman renewed her motion for a judgment of acquittal based on errors in the jury instruction for the maintaining a drug related premises count; and also alleging an inconsistent jury verdict – acquitting Ms. Newman of conspiring to distribute controlled substances and actually distributing controlled substances, while convicting her of maintaining a premises to distribute those very same controlled substances. The district court denied the motion. Following the district court's sentencing and final judgment, Ms. Newman timely filed an appeal to the United States Court of Appeals for the Sixth Circuit.

On April 11, 2022, the Sixth Circuit issued its opinion affirming Ms. Newman's conviction. *United States v. Hofstetter, et al.*, 31 F.4th 396 (6th Cir. 2022) As to Ms. Newman's challenge on the jury instruction, the Sixth Circuit held that the district court did not err when it instructed the jury that they only needed to find that the defendants had 1) knowingly opened, used or maintained a place; and 2) that they did so for the purpose of distributing any controlled substance, without any explanation of the specific conduct that made their actions unlawful. *Id.* at 416. The court opined due to the "proximity of the illegality element" and the instructions taken as a whole, particularly relying on the instructions relating to the illegal distribution counts under 21 U.S.C. 841, that the district court did not plainly err when it gave the instruction. *Id.*

After the Sixth Circuit issued its opinion, Ms. Newman filed a Petition for Certiorari with the United Supreme Court and on October 17, 2022, this Court granted the Petition of Ms. Newman and her co-defendants, vacated the ruling below, and remanded the case to the Sixth Circuit in light of the decision in *Ruan*.

Once remanded to the Sixth Circuit and after re-briefing and argument by the parties, the Court issued an opinion finding that Ms. Newman and the other co-defendants failed to object to proposed jury instruction relating to §856(a)(1) and that the jury instruction, when "taken as a whole" was proper.

The opinion of the Sixth Circuit is based upon improper legal and factual findings and is contrary to this Court's decision in *Ruan* and thus Ms. Newman respectfully files this timely petition for a writ of certiorari.

REASONS FOR GRANTING THE PETITION

A. *Ruan* applies to 21 U.S.C. § 856 and once the Sixth Circuit acknowledged that *Ruan* applied to Ms. Newman's case, it was obligated to follow binding Supreme Court precedent in how it applied the law announced in *Ruan*.

Upon remand from this Court, the Sixth Circuit acknowledged that *Ruan* applies to charges brought under 21 U.S.C. § 856(a)(1). *United States v. Hofstetter*, 80 F.4th 725, 729. (6th Cir. 2023) ("The parties agree that the holding in *Ruan* applies to convictions under §856(a)(1)") The Sixth Circuit then proceeded with its' analysis on the basis that *Ruan* was applicable to § 856(a)(1) cases. The Sixth Circuit reasoned that "under *Ruan*, the district court must have instructed the jury that knowledge of illegal distribution is an element of offenses under § 856(a)." [2] However, the Sixth Circuit then began to conflate the generic term "illegal" with the actual standard that is required that is set forth in *Ruan* and other physician prescribing cases, *i,e*, the government must prove the defendant subjectively knew or intended that the prescription was unauthorized.

The term "illegal" as noted above, is a generic term and is subject to different interpretations by different persons – what one person may view as illegal, another might view as completely lawful. Thus, a jury of twelve may have twelve different interpretations of "illegal" subjecting a criminal defendant to twelve different interpretations of guilt and a jury could conceivably convict a defendant without the

[2] The term "illegal" appears nowhere in 21 U.S.C. §856.

defendant or the other jurors knowing what conduct they believed was worthy of conviction.

Post-*Ruan*, in order to convict a physician for an offense such as 21 U.S.C. § 856(a)(1) which has an element of distribution of a controlled substance, a jury must find that a physician subjectively believed they were prescribing medications in an unauthorized manner, but that did not happen here. Taken as a whole, the jury instruction did not convey *Ruan* standard to the jury and because of that, the jury instruction was erroneous and cannot be the basis for a conviction in this matter. This Court must grant *certiorari*, vacate the decision of the Sixth Circuit, and remand with instruction to follow the decision in *Ruan*.

B. A jury instruction which required the jury to use an objective standard to determine whether Ms. Newman distributed controlled substances is plain error requiring reversal of the conviction

Petitioner Newman's one count of conviction was for a violation of 21 U.S.C. § 856(a)(1), based upon her being a nurse practitioner at a licensed pain clinic. Although the district court provided no guidance in the § 856(a)(1) instructions, in a subsequent instruction it informed the jury that an objective, not subjective standard should determine whether Ms. Newman's distribution practices were within the usual scope of professional practice and this Court's pronouncement in *Ruan v. United States* requires vacation of the conviction. The Sixth Circuit's determination that Newman failed to meet the plain error standard is contrary to this Court's pronouncement in *Henderson v. United States*, 568 U.S. 266, 133 S. Ct. 1121, 185 L. Ed. 2d 85 (2013), and thus must be reversed.

In *Ruan v. United States*, 142 S. Ct. 2370, 213 L. Ed. 2d 706 (2022), this Court, interpreting 21 U.S.C. § 841, determined that where a health care professional is charged for conduct within the scope of his or her practice, "the Government must prove beyond a reasonable doubt that the defendant knew that he or she was acting in an unauthorized manner, or intended to do so." 142 S.Ct. at 2375. In doing so, the Court vitiated lower court rulings which had allowed the Government to prove that the health care professional did not act in "good faith" or in an "objectively reasonable" manner. The Court concluded that "for purposes of a criminal conviction under § 841, this requires proving that a defendant knew or intended that his or her conduct was unauthorized." *Id.* at 2382. As discussed previously, the Government and the Sixth Circuit agreed that § 856(a)(1) has the same *mens rea* requirements and thus courts are required to follow *Ruan* when instructing a jury as to the elements necessary for a verdict.

The jury in Petitioner Newman's case was instructed "[i]f a nurse practitioner prescribes a drug in good faith in the course of medically treating a patient, then the nurse practitioner has prescribed the drug for a legitimate medical purpose in the usual course of accepted medical practice, that is, she has prescribed the drug lawfully." The jury was further informed "whether a practitioner -- finally, whether a prescription is made in the usual course of professional practice is to be determined from an objective and not a subjective viewpoint." While the Sixth Circuit correctly found this instruction was error under *Ruan*, the court ultimately

determined that it was not reversible error under a plain error review. In doing so, the Sixth Circuit misapplied the plain error standard.

"To establish eligibility for plain-error relief, a defendant must satisfy three threshold requirements. [ ] First, there must be an error. Second, the error must be plain. Third, the error must affect 'substantial rights,' which generally means that there must be 'a reasonable probability that, but for the error, the outcome of the proceeding would have been different.'" *Greer v. United States*, 141 S. Ct. 2090, 2096, 210 L. Ed. 2d 121 (2021). In *Henderson*, this Court made clear that the "time of error" rule does not apply to a plain error review – that the error is in fact an error at the time of appellate review satisfies the standard, even when the district court was not "in error" at the time of trial. *Henderson v. United States*, 568 U.S. 266, 275, 133 S. Ct. 1121, 1128, 185 L. Ed. 2d 85 (2013). Thus, the Court instructed that "plain-error review is not a grading system for trial judges. It has broader purposes, including in part allowing courts of appeals better to identify those instances in which the application of a new rule of law to cases on appeal will meet the demands of fairness and judicial integrity." 568 U.S. at 277.

At issue is the Sixth Circuit's interpretation of the third requirement. The Sixth Circuit determined that the district court's "overview of the charges" at the beginning of the jury instructions, which allegedly gave a conflicting answer as to whether the jury should use an objective or subjective standard, was adequate to show that, absent the error, the jury would have come to the same conclusion. However, there are two problems with relying on this overview. First, the district

court informed the jury, as to the overview, that the "brunt" of the instructions were the elements, and that, as to those instructions, they would be placed on the screens as the court read them. Further, the district court's summary was not a recitation of the elements of the offenses. For example, as to count 13 (the only count of conviction), the district court noted " Count 13 charges Defendants Hofstetter, Newman, Clemons, and Womack with opening, using, and maintaining a drug-involved premise -- or premises at East Knoxville Healthcare Services on Lovell Road in Knoxville, Tennessee." Clearly, this summary was not intended to provide the jury with the elements of the offense, but was what the district court said it was, a short summary.

Moreover, the Sixth Circuit, in reviewing the damage of the faulty instruction, failed to weigh the fact that the jury had acquitted Newman and the other practitioners of the conspiracy counts and the distribution counts. When given other, more specific instructions such as those given on the conspiracy counts and the distribution counts, the jury chose to acquit Ms. Newman and it can reasonably be assumed that the jury determined that Newman did not distribute controlled substances outside the scope of professional practice and without legitimate medical purpose. It was only where the jury was given the open-ended "illegal" instruction in the 21 U.S.C. § 856 count which allowed them to substitute their own judgment about "illegality" in place of the actual elements of the offense that they found Ms. Newman guilty despite determining that she had neither

conspired to or distributed controlled substances. The error in the 21 U.S.C. § 856 instruction must have substantially swayed the jury's determination, given this.

It was plain error for the district court not to give an instruction which did not meet the *Ruan* standard. The Sixth Circuit further compounded that error by finding that the undefined term "illegally" was an adequate replacement for the *Ruan* language.

Likewise, the Sixth Circuit's admission that the instructions were contradictory in places should have triggered it to find that the error could not be harmless. This Court has held that "[L]anguage that merely contradicts and does not explain a constitutionally infirm instruction will not suffice to absolve the infirmity. A reviewing court has no way of knowing which of the two irreconcilable instructions the jurors applied in reaching their verdict." *Francis v. Franklin*, 471 U.S. 307, 322, 105 S. Ct. 1965, 1975, 85 L. Ed. 2d 344 (1985). Thus, that the instructions contradicted each other as to this critical issue – the only real contested issue in the trial, required a finding of plain error.

The Sixth Circuit determined that the above reference to an "objective viewpoint" was not legal error because "[w]hether a prescription was unauthorized is an objective question because 'the regulation defining the scope of a doctor's prescribing authority does so by reference to objective criteria[.]" *Ruan*, 142 S. Ct. at 2382. This is a misreading of *Ruan*. As *Ruan* makes clear, the subjective question is whether Defendants knowingly or with intent issued unauthorized prescriptions." Although the regulation itself is an objective standard, the Government's burden is

clear: "for purposes of a criminal conviction under § 841, this requires proving that a defendant knew or intended that his or her conduct was unauthorized." *Ruan* at 2382. It is the lack of any subjective evidence as to Newman's intent in the record, coupled with the faulty instruction, which makes the instruction reversible error.

The Sixth Circuit's decision ultimately reflects a misunderstanding of the plain error standard. As this Court held in *Rosales-Mireles v. United States*, 138 S. Ct. 1897, 201 L. Ed. 2d 376 (2018), even unintended or inadvertent errors can rise to the level of plain error. The Court, in rejecting the Fifth Circuit's "shock the conscience" standard of plain error review, found that "[b]y focusing instead on principles of fairness, integrity, and public reputation, the Court recognize[s] a broader category of errors that warrant correction on plain-error review." 138 S.Ct. at 1906. Moreover, "[t]he risk of unnecessary deprivation of liberty particularly undermines the fairness, integrity, or public reputation of judicial proceedings . . ." *Id.* at 1908.

The Sixth Circuit's plain error analysis wholly ignores this plain error standard, and instead replaces it with a new one: if in the context of a jury instruction error, the jury was given both incorrect and partially correct instructions, it should be assumed that the jury followed the partially correct ones, and therefore, no plain error exists. This Court's precedents in *Rosales-Mireles* and elsewhere require otherwise.

Finally, the Sixth Circuit's analysis misses the plain error mark because it does not show what evidence would have supported a jury finding on subjective

intent. The only evidence presented by the Government related to their experts, and whether Petitioner Newman's conduct met an objective standard within the healthcare professional community. The Government provided no evidence as to Newman's state of mind or actual criminal intent and, as *Ruan* clarifies, this is not enough.

C. The Sixth Circuit's application of *Ruan* is contrary to other circuits

The Sixth Circuit has attempted to apply this Court's decision in *Ruan* in the most narrow ways possible. In addition to the decision in Petitioner Newman's case, in *United States v. Anderson*, 67 F.4th 755 (6th Cir. 2023) the Sixth Circuit held that the jury instructions in that case "substantially covered" the *mens rea* requirement as set forth in *Ruan*, even though it used language that had been specifically rejected in *Ruan*.[3] In *United States v. Sakkal*, Dkt. No. 20-3880 (6th Cir., May 31, 2023) the Sixth Circuit again found that the inclusion of language that had been rejected in *Ruan* was sufficient because, although Dr. Sakkal had requested a subjective good faith instruction, he had failed to object to the language in the final instruction.

The Sixth Circuit's narrow and erroneous interpretation *Ruan* is also contrary to other circuits that have decided this very issue, creating a conflict among the circuits which must be resolved by this Court.

[3] But cf. *United States v. Hofstetter*, 81 F.4th 725, 732 (6th Cir. 2023) Cole, CJ concurrence ("…I write separately to highlight how *Anderson* conflicts with *Ruan*… Judge White penned a forceful dissent explaining why the instruction does not meet the Court's *mens rea* standard for unauthorized prescription distribution…I agree with her dissent…")

The Tenth Circuit's decision in *United States v. Kahn*, 58 F.4th 1308 (10th Cir. 2023) is directly on point. There, the defendant received certiorari relief based upon *Ruan*. Upon remand to the Tenth Circuit, the Government argued that the error in the instructions was harmless. The Tenth Circuit disagreed. The court noted that the defendant did not contest he distributed the substances in his role as a physician, nor did he contest that some of his patients abused the drugs. The only issue at trial was his intent. The Government cited voluminous evidence in the record to support their argument that, under a subjective standard, there was "overwhelming" evidence to convict under the new *Ruan* standard. The Tenth Circuit disagreed with this analysis, finding "[w]here an element of an offense is contested at trial, as it was here, the Constitution requires that the issue be put before a jury—not an appellate court. . . . . In this case, Dr. Kahn's intent was in dispute throughout his trial and was the centerpiece of his defense. A jury, properly instructed, must address whether the government carried its burden to establish Dr. Kahn's intent beyond a reasonable doubt." *Id.* at 1319.

A similar result occurred in *Ruan* itself. *United States v. Ruan*, 56 F.4th 1291 (11th Cir. 2023). After remand from this Court, the Eleventh Circuit determined that, even though a "good faith" instruction was given to the jury, vacation of the 21 U.S.C. § 841 convictions was necessary. "[T]he district court did not adequately instruct the jury that the defendants must have 'knowingly or intentionally' prescribed outside the usual course of their professional practices. At a minimum, as discussed above, without the limiting qualification that only subjective good faith

was sufficient for conviction, the jury was authorized to convict under the sort of objective good faith or honest effort standard rejected by the Supreme Court." *Id.* at 1298. As such, "a properly instructed jury may not have convicted the defendants had it known that Dr. Ruan's and Dr. Couch's subjective beliefs that they were acting properly was a defense to these charges. Similar to *McDonnell*, under the erroneous instruction in this case the jury was authorized to convict the defendants for conduct that was lawful. Thus, we cannot conclude that these errors were harmless." *Id.*

The Sixth Circuit's treatment of *Ruan* is fundamentally different from that of the Tenth and Eleventh Circuits. This creates a conflict among the circuits which must be addressed by this Court. There is no question but that Newman was involved in the dispensing of controlled substances; she was a nurse practitioner who wrote prescriptions for patients she had examined. The issue before the jury as to this element was whether she knowingly did so outside the scope of professional practice and without medical necessity and outside of her authorization. *Ruan* required the jury to determine her subjective intent – a finding the jury never made in this case and was not allowed to make. The Sixth Circuit's finding that this did not constitute plain error is a misinterpretation of not only *Ruan*, but this Court's plain errors precedents. This Court should grant certiorari review, and remand for a new trial.

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Because the facts in this Petition are substantially similar for the petitioners in the related cases listed above, Cynthia Clemons, and Holli Womack, petitioner Courtney Newman would adopt by reference the arguments of the petitioners in the related cases and respectfully request this Court allow such an adoption of arguments as if fully formed here for the sake of judicial economy.

CONCLUSION

For the foregoing reasons, Courtney Newman respectfully requests this Court to grant her Petition for a Writ of Certiorari, vacate the decision of the United States Court of Appeals for the Sixth Circuit, and remand for dismissal of the conviction.

Respectfully submitted,

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