

No. _____

IN THE
SUPREME COURT OF THE UNITED STATES

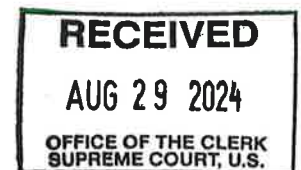
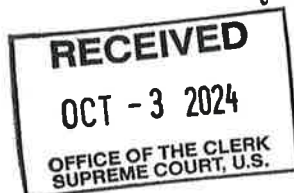
QUANNAH L. HARRIS - PETITIONER

VS.

THE SECRETARY OF STATE ET AL - RESPONDENT

ON PETITION FOR A WRIT OF CERTIORARI TO
THE UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT
PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. Whether a civil rights claim under 42 U.S.C. § 1983 can proceed against a state administrative agency and an administrative law judge when the plaintiff alleges ongoing violations of federal law and seeks prospective injunctive relief, and whether the dismissal of such claims based on Eleventh Amendment and judicial immunity, without addressing the applicability of the Younger abstention doctrine, is appropriate?

(Suggested Answer: Yes)

LIST OF PARTIES

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:

PETITIONER

1. **QUANNAH L. HARRIS dba LAST MINUTE CUTS**

RESPONDENTS

2. **THE OFFICE OF THE SECRETARY OF STATE ADMINISTRATIVE
PROCEDURES DIVISION FOR TENNESSEE**
3. **JUDGE MATTIELYN WILLIAMS**

LIST OF RELATED CASES

- *Quannah Harris vs Secretary of State for Tennessee et al*, No. 2:22-cv-02478-MSN-tmp, U. S. District Court for the Western District of Tennessee. Judgment entered August 31, 2023.
- *Quannah Harris vs Secretary of State for Tennessee et al*, No. 23-5833, U. S. Court of Appeals for the Sixth Circuit. Judgment entered May 29, 2024.

The cases listed below are also related to this case:

1. **Harris vs Biddle et al**, 2:18-cv-02631-MSN-tmp , U. S. District Court for the Western District of Tennessee
2. **Harris vs Hutson at al** 2:21-cv-02717-MSN-tmp , U. S. District Court for the Western District of Tennessee
3. *Quannah Harris vs Tennessee Department of Commerce and Insurance*, Docket # CH-22-0166 Shelby County Chancery Court,
4. **USA vs Quannah Fields Harris**
Cr. No. 24-20002-JTF , U. S. District Court for the Western District of Tennessee

CORPORATE DISCLOSURE

Pursuant to Federal Rule of Appellate Procedure 26.1 and Sixth Circuit Rule 26.1, Appellant hereby make the following disclosures:

- (1) Is said party a subsidiary or affiliate of a publicly owned corporation? No.
- (2) Does a publicly owned corporation or its affiliate, not a party to the appeal, have a financial interest in the outcome? No

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Appellate Procedure 2

Rule 28(4) of the Federal Rules of
Appellate Procedure 2

**IN THE SUPREME COURT
OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI**

Petitioner Quannah Harris respectfully prays the issuance of the writ of certiorari to review the judgment of the United States Court of Appeals from the Sixth Circuit.

OPINIONS BELOW

1. United States Court of Appeals for the Sixth Circuit: The opinion affirming the dismissal of Petitioner's civil rights complaint is reported at APPENDIX A and was issued on May 29, 2024. The Court of Appeals' decision upheld the district court's judgment based on Eleventh Amendment immunity, judicial immunity, and failure to address the Younger abstention doctrine.

2. United States District Court for the Western District of Tennessee: The opinion granting the defendants' motion to dismiss Petitioner's complaint with prejudice is reported at APPENDIX B and was issued on August 31, 2023. The district court's decision found no merit in Petitioner's claims of collusion, judicial misconduct, and double jeopardy, leading to the dismissal of the case

JURISDICTION

Pursuant to Rule 28(4) of the Federal Rules of Appellate Procedure, the appellant asserts the following basis of jurisdiction:

Petitioner respectfully prays that a writ of certiorari is issued to review the judgments below, specifically:

1. The decision of the United States Court of Appeals for the Sixth Circuit in Case No. 23-5833, which affirmed the district court's judgment dismissing Petitioner's civil rights complaint under 42 U.S.C. § 1983 based on Eleventh Amendment immunity, judicial immunity, and failure to address the Younger abstention doctrine.
2. The judgment of the United States District Court for the Western District of Tennessee, which granted the defendants' motion to dismiss Petitioner's complaint with prejudice, finding no merit in Petitioner's claims for collusion, judicial misconduct, and double jeopardy.

The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1), which authorizes the Supreme Court to review decisions of the United States Courts of

Appeals. The decision sought to be reviewed was rendered by the United States Court of Appeals for the Sixth Circuit in Case No. 23-5833.

CONSTITUTIONAL AND STATUTORY PROVISIONS

1. **U.S. Constitution, Fourteenth Amendment:** Provides for the protection of due process rights and equal protection under the law.
2. **42 U.S.C. § 1983:** Allows individuals to sue for violations of constitutional rights committed by persons acting under color of state law.
3. **Eleventh Amendment:** Establishes the principle of state sovereign immunity, preventing states from being sued in federal court without their consent.
4. **Ex parte Young, 209 U.S. 123 (1908):** Establishes an exception to Eleventh Amendment immunity for suits seeking prospective injunctive relief against state officials for ongoing violations of federal law.
5. **Judicial Immunity:** Doctrine providing immunity to judges from lawsuits for actions taken in their judicial capacity.
6. **Younger v. Harris, 401 U.S. 37 (1971):** Provides the principle of abstention, preventing federal court intervention in certain state matters where the state provides an adequate forum to resolve the issues.

STATEMENT OF THE CASE

Petitioner Quannah L. Harris, doing business as Last Minute Cuts School of Barbering and Cosmetology, filed a Civil Rights complaint under 42 U.S.C. § 1983 against the Tennessee Secretary of State's Administrative Procedures Division (APD) and Administrative Law Judge Mattielyn B. Williams. Harris's complaint alleged violations of her constitutional rights stemming from administrative actions and judicial proceedings related to the operation and licensing of her barber school.

In 2017, Persuaded by her attorney, Harris resolved several bogus administrative complaints through an Agreed Order with the Tennessee Board of Cosmetology and Barber Examiners (Board). Harris initiated a federal lawsuit in 2018 due to fraud and forgery of evidence received during the Administrative Hearing, see *Quannah Harris vs Jerry Biddle et al*, 2:18-cv-02631-MSN-tmp. The court ruled in favor of the defendants, not based on justice or the law but technicalities.

In retaliation for filing a Federal Lawsuit, additional bogus administrative complaints were filed against Harris's school, Once this litigation was unjustly dismissed in 2021, the Board continue their acts of harassment and conducted over nine additional inspections. In addition the Board filed new administrative complaints, using several falsified documents, which they used to suspend Harris's licenses.

Harris's subsequent federal lawsuit in 2021, see Quannah Harris vs Melissa Hutson, et al, 2:21-cv-02717-MSN-tmp, the Tennessee Cosmetology brought forth more false allegations through fraud and forgery in efforts to retaliate against Harris in order to close Harris' school. Following a hearing before Judge Williams, the Board revoked the licenses of Last Minute Cuts. During the Hearing Judge Williams refused to follow Tennessee State Laws which govern Barber and Cosmetology schools & shops and denied Harris and opportunity to present evidence of compliance or cross examine witnesses during the Hearing. Additionally, Judge Williams asked the Board's attorney, Michael Underhill, to find and hold her a parking space. Mr. Underhill found and held her parking space; carried her computer and bags to her seat; while assisting her to her seat in the Hearing. Since, Judge Williams was struggling to walk on her cane, Judge Williams requirements compromised her objectivity.

The Respondents employed several tactics of harassing and depriving the rights of Ms. Harris colluding with Federal, State, and Local government employees, including but not limited to false imprisonment for made up allegations of fraud and wire fraud, see USA vs Quannah Fields Harris, Cr. No. 24-20002-JTF.

In this federal lawsuit, Harris alleged collusion, judicial misconduct, and double jeopardy. She contended that Judge Williams [in collusion with Others] under the color of law engaged in misconduct, exhibited personal bias, denied Harris due process, and excluded Harris from critical proceedings. The defendants

moved to dismiss the complaint based on Eleventh Amendment immunity for the APD, judicial immunity for Judge Williams, and the Younger abstention doctrine.

The district court adopted the magistrate judge's recommendation to dismiss the complaint, affirming that Eleventh Amendment and judicial immunities applied. The court did not address the Younger abstention doctrine, concluding that the complaint was dismissed with prejudice on other grounds.

Harris appealed the district court's dismissal. The Sixth Circuit Court of Appeals affirmed the dismissal, upholding the district court's reliance on Eleventh Amendment immunity, judicial immunity, and finding no need to address Younger abstention. The appellate court ruled that Harris's complaint did not meet the exceptions to immunity doctrines and failed to show sufficient grounds for prospective relief.

The core legal issues in this case involve the application and exceptions to Eleventh Amendment and judicial immunity, the appropriateness of Younger abstention, and the standards for civil rights claims under 42 U.S.C. § 1983. The Sixth Circuit's ruling, affirming the dismissal of Harris's claims, has significant implications for the interpretation of these doctrines and the protection of constitutional rights in administrative and judicial proceedings.

REASONS FOR GRANTING THE PETITION

A. Important Constitutional and Statutory Issues

The petition presents critical constitutional and statutory issues that are ripe for the Supreme Court's review. These issues involve the interpretation and application of Eleventh Amendment immunity and judicial immunity under 42 U.S.C. § 1983, and their implications for civil rights litigation. The Supreme Court's intervention is necessary to address these complex and important questions:

i. Eleventh Amendment Immunity and the *Ex parte Young* Doctrine

The Eleventh Amendment to the United States Constitution provides that states cannot be sued in federal court without their consent. This principle is foundational to state sovereignty and is typically understood to bar federal lawsuits against states and their agencies. However, the doctrine established in *Ex parte Young*, 209 U.S. 123 (1908), creates an exception allowing suits against state officials for prospective injunctive relief to address ongoing violations of federal law.

In the case at hand, the petitioner challenges the applicability of Eleventh Amendment immunity to the Tennessee Secretary of State's Administrative Procedures Division (APD) and its officials, including Administrative Law Judge Mattielyn B. Williams. The district court and the Sixth Circuit found that the APD is immune under the Eleventh Amendment, and that Judge Williams, in her official capacity, also enjoyed immunity.

The petitioner argues that the lower courts misapplied the *Ex parte Young* doctrine. The question arises whether the APD, as a state agency, can be considered a “state official” under this doctrine, and whether Judge Williams’s actions, which are alleged to be ongoing and in violation of federal law, fall within the scope of this exception. This issue is of significant constitutional importance as it determines the extent to which state agencies and officials can be held accountable for violations of federal law, particularly when such violations impact civil rights.

ii. Judicial Immunity and Its Limits

Judicial immunity protects judges from civil suits for actions taken in their official capacity, ensuring that they can perform their judicial functions without fear of personal liability. This immunity extends to administrative law judges who perform judicial functions. However, the doctrine does not provide immunity for actions taken outside the scope of judicial duties or for actions that are not related to the judicial process.

In this case, the petitioner alleges that Administrative Law Judge Mattielyn B. Williams engaged in judicial misconduct, including bias, exclusion of evidence, and collusion with the Board’s attorney. These allegations suggest potential misconduct that could fall outside the protective scope of judicial immunity. The lower courts upheld immunity despite these serious allegations, which raises questions about the boundaries of judicial immunity.

The petitioner contends that Judge Williams's actions were not merely judicial errors but involved conduct that might be characterized as outside the judicial function or as an abuse of power. The Supreme Court's review is needed to clarify the limits of judicial immunity, particularly in cases involving allegations of substantial misconduct or bias that could undermine the fairness of the judicial process.

iii. Intersection of Immunity Doctrines and Civil Rights Claims

The interplay between Eleventh Amendment immunity, judicial immunity, and civil rights claims under 42 U.S.C. § 1983 is complex and critical to ensuring effective redress for constitutional violations. The petitioner argues that the lower courts' interpretations of these doctrines have unjustly impeded her ability to seek relief for alleged violations of her civil rights.

The Supreme Court's guidance is essential to resolve these issues and provide a clear framework for the application of immunity doctrines in civil rights cases. Clarification from the Court will help ensure that individuals who face potential abuses of power by state officials and administrative judges have a meaningful avenue for redress, and that immunity doctrines do not unduly shield officials from accountability for constitutional violations.

By addressing these important constitutional and statutory issues, the Supreme Court can provide crucial guidance on the limits and application of immunity doctrines, ensuring that civil rights protections are upheld and that state

officials are held accountable for their actions in accordance with federal law.

B. The Lower Courts' Decisions Conflict with Established Precedent and Create Discrepancies in the Law

The decisions of the district court and the Sixth Circuit Court of Appeals in this case present significant conflicts with established precedents of the Supreme Court and create troubling discrepancies in the law. These conflicts warrant the Supreme Court's review to ensure uniformity and consistency in the interpretation of key legal doctrines, particularly regarding immunity and civil rights protections.

i. Conflict with Supreme Court Precedent on Eleventh Amendment Immunity and *Ex parte Young*

The Supreme Court has established in *Ex parte Young* that state officials can be sued for prospective injunctive relief to address ongoing violations of federal law, despite the general rule of Eleventh Amendment immunity. The Court's decisions in cases such as *Seminole Tribe of Florida v. Florida*, 517 U.S. 44 (1996), and *Pennhurst State School & Hospital v. Halderman*, 465 U.S. 89 (1984), reaffirm the principle that while states are immune from damages, they may be subject to injunctive relief when violating federal law.

However, the lower courts in this case determined that the Tennessee Secretary of State's Administrative Procedures Division (APD) is immune from suit, and that Administrative Law Judge Mattielyn B. Williams, in her official capacity, also enjoys immunity. This determination is inconsistent with the *Ex parte Young*

doctrine as interpreted by the Supreme Court. The courts' findings effectively preclude any judicial review of the APD's actions, which directly contradicts the principles established in *Ex parte Young* and its progeny.

The discrepancy lies in the courts' broad application of Eleventh Amendment immunity to the APD and Judge Williams, potentially expanding immunity beyond what the Supreme Court has sanctioned. This expansion limits the ability of individuals to seek redress for ongoing violations of federal law, undermining the protections guaranteed by the Court's precedents.

ii. Misapplication of Judicial Immunity Doctrine

The Supreme Court's decisions on judicial immunity, such as in *Stump v. Sparkman*, 435 U.S. 349 (1978), and *Bradley v. Fisher*, 80 U.S. (13 Wall.) 335 (1871), establish that judges are immune from civil liability for actions taken in their judicial capacity, but not for actions outside of their judicial functions or those involving clear misconduct.

In the present case, the lower courts' broad application of judicial immunity to Administrative Law Judge Mattielyn B. Williams, despite serious allegations of bias, misconduct, and improper conduct, appears to diverge from the Supreme Court's guidance. The petitioner's allegations suggest that Judge Williams's actions were not merely errors in judgment but involved potential misconduct that could fall outside the scope of judicial immunity. The failure of the lower courts to address these allegations within the context of established judicial immunity principles

creates a significant conflict with Supreme Court precedent.

This misapplication of judicial immunity undermines the fundamental principle that immunity does not extend to clear abuses of judicial power, thereby affecting the balance between judicial protection and accountability. The Supreme Court's review is necessary to resolve these discrepancies and clarify the boundaries of judicial immunity in cases involving allegations of substantial misconduct.

iii. Creation of Discrepancies in Lower Courts' Application of Immunity Doctrines

The lower courts' decisions contribute to an inconsistent application of immunity doctrines across different jurisdictions, creating confusion and uncertainty in civil rights litigation. The varying interpretations of Eleventh Amendment immunity and judicial immunity by different courts lead to disparate outcomes for similarly situated individuals seeking redress for constitutional violations.

For instance, while some courts may apply Eleventh Amendment immunity broadly, precluding suits against state agencies and officials, others may interpret the *Ex parte Young* exception more narrowly, affecting the ability to obtain injunctive relief. Similarly, judicial immunity is applied differently depending on the nature of the allegations against judges and the specifics of their conduct.

These discrepancies hinder the uniform application of constitutional protections and civil rights remedies. The Supreme Court's intervention is crucial to address these inconsistencies and provide clear guidance on the application of

immunity doctrines. By resolving these conflicts, the Court can ensure that civil rights claims are adjudicated fairly and consistently, reinforcing the principles of accountability and protection against constitutional violations.

C. The Case Presents an Important Question of Federal Law that Requires Resolution by the Supreme Court

The case at hand presents a critical question of federal law that necessitates the Supreme Court's intervention to ensure consistent and just application of constitutional protections and legal principles. Specifically, the case raises substantial issues regarding the scope of immunity doctrines and the balance between state sovereignty and individual rights under federal law. These issues have far-reaching implications for civil rights enforcement and the ability of individuals to seek redress for violations of their constitutional rights.

The Supreme Court's decisions on immunity doctrines, including Eleventh Amendment immunity and judicial immunity, play a fundamental role in determining the accessibility of federal courts for individuals seeking to enforce their constitutional rights. This case challenges the boundaries of these immunity doctrines, particularly in the context of state administrative agencies and individual state officials.

The crucial question is whether Eleventh Amendment immunity extends to state administrative bodies such as the Tennessee Secretary of State's APD and

whether this immunity can be applied to bar all forms of relief, including injunctive relief, as permitted under *Ex parte Young*. Additionally, the case raises the issue of judicial immunity in the context of alleged misconduct by an administrative law judge. The resolution of these questions will significantly impact the ability of individuals to challenge unlawful actions and seek remedies through the judicial system.

The inconsistent application of immunity doctrines by lower courts creates uncertainty and confusion regarding the protections available to individuals bringing civil rights claims. The Supreme Court's review is essential to clarify the extent to which immunity doctrines apply and to establish a uniform standard for determining when state officials and judicial officers are subject to suit.

For example, the broader application of Eleventh Amendment immunity in this case could set a precedent that limits access to federal courts for individuals seeking to challenge state actions that violate federal law. Conversely, a narrow interpretation of judicial immunity could impact the balance between protecting judges from frivolous claims and ensuring accountability for serious misconduct. The outcome of this case has significant implications for the broader landscape of civil rights and constitutional protections. The Supreme Court's resolution of these issues will affect not only the parties involved but also individuals nationwide who rely on the judicial system to address violations of their constitutional rights. Ensuring that individuals have meaningful access to legal remedies and that state

and judicial officials are held accountable for their actions is vital to upholding the rule of law and protecting constitutional guarantees.

Addressing these questions will provide clarity on the interplay between immunity doctrines and individual rights, ensuring that the principles of justice and accountability are maintained. The Supreme Court's involvement is necessary to resolve these pressing legal issues and to provide guidance that will shape the application of immunity doctrines in future cases.

Given the divergent interpretations of immunity doctrines by various lower courts, the Supreme Court's review is crucial to harmonize the legal standards and ensure consistent application across jurisdictions. The Court's resolution of these issues will not only provide definitive answers but also establish a coherent framework for addressing similar cases in the future.

The Supreme Court's guidance on these matters will contribute to the development of a consistent and predictable legal landscape, enhancing the ability of individuals to seek redress and reinforcing the principles of justice and fairness in the legal system. The importance of this case underscores the need for the Supreme Court's intervention to uphold the integrity of federal law and protect constitutional rights.

D. Need for Supreme Court Guidance

The complexities and far-reaching implications of the issues presented in this case underscore the necessity for Supreme Court guidance. The legal questions

involved are not only pivotal to the resolution of this case but also have significant consequences for the broader legal landscape, impacting numerous cases and individuals across the country. The need for Supreme Court intervention is driven by several key factors:

The legal issues at stake in this case involve critical questions of federal law, including the scope and application of immunity doctrines, which are currently subject to varying interpretations by lower courts. These inconsistencies create a fragmented legal environment that affects the ability of individuals to seek redress and achieve justice. The Supreme Court's guidance is essential to resolving these discrepancies and ensuring a uniform standard that applies across all jurisdictions.

The conflicting interpretations of immunity doctrines by different circuits and state courts highlight the necessity for a definitive ruling from the Supreme Court. Without such guidance, the legal landscape will remain unsettled, leading to confusion and inequitable outcomes in civil rights cases nationwide.

The Supreme Court's involvement is crucial to establishing a consistent and coherent application of federal law. The Court's review will provide authoritative guidance on the limits of immunity doctrines and the rights of individuals seeking to challenge unlawful actions. This clarity will benefit not only the parties involved in this case but also countless others who are affected by similar legal questions.

A ruling from the Supreme Court will help standardize the application of federal law, reducing the potential for inconsistent rulings and ensuring that

individuals have equal access to justice regardless of their jurisdiction. This consistency is vital for upholding the principles of fairness and equality under the law.

The resolution of this case by the Supreme Court will have significant implications for the protection of constitutional rights and the enforcement of legal precedents. The Court's guidance is needed to affirm the balance between protecting state sovereignty and ensuring that individuals have meaningful remedies for constitutional violations.

By addressing the critical issues presented, the Supreme Court will reaffirm its commitment to safeguarding individual rights and reinforcing the rule of law. The Court's ruling will help maintain the integrity of constitutional protections and ensure that legal precedents are applied consistently and justly.

Supreme Court guidance is essential for providing legal certainty and predictability in future cases involving similar issues. A definitive ruling on the questions presented will offer clear standards and principles that lower courts can apply in subsequent cases, promoting fairness and consistency in the legal system.

The Court's review will also offer valuable insights and clarifications that will assist legal practitioners, scholars, and policymakers in navigating complex legal questions and ensuring that justice is served. By providing authoritative guidance, the Supreme Court will contribute to the development of a robust and equitable legal framework that benefits all individuals and upholds the principles of justice.

The Supreme Court's intervention is crucial to upholding the rule of law and maintaining the integrity of the judicial system. The issues raised in this case involve fundamental questions of legal accountability and the proper role of immunity doctrines in protecting state and judicial officials. The Court's review will ensure that these doctrines are applied appropriately and that individuals have access to effective remedies for constitutional violations.

The Court's guidance will reinforce the principles of justice and accountability, ensuring that legal standards are upheld and that the rights of individuals are protected. By addressing the key questions presented, the Supreme Court will play a pivotal role in preserving the integrity of the legal system and promoting a fair and just society.

E. Lower Court's Erroneous Interpretation

The lower court's interpretation of the relevant legal principles and application of statutory and constitutional provisions in this case were fundamentally flawed, leading to a decision that undermines the core principles of justice and fairness. This erroneous interpretation warrants review by the Supreme Court to correct the legal errors and ensure proper adherence to established legal standards. The specific issues with the lower court's decision include:

The lower court's ruling reflects a misapplication of the legal standards governing immunity doctrines and the protection of constitutional rights. The court's decision deviated from established precedents, failing to appropriately

consider the scope and limitations of immunity as defined by prior Supreme Court rulings. This misapplication resulted in a denial of meaningful remedies for the petitioner and a broader impact on similar cases involving constitutional claims.

By incorrectly interpreting the legal standards, the lower court's decision has set a troubling precedent that conflicts with established jurisprudence. The Supreme Court's review is necessary to clarify and correct these legal missteps, ensuring that the proper standards are applied consistently in future cases.

The lower court's decision is inconsistent with key Supreme Court precedents that define the boundaries of immunity doctrines and the protection of individual rights. In particular, the court's analysis failed to adhere to the principles established in landmark cases such as *Harlow v. Fitzgerald* and *Saucier v. Katz*, which provide a framework for evaluating claims of immunity and constitutional violations.

By deviating from these precedents, the lower court's decision has introduced uncertainty and inconsistency into the legal framework governing immunity and civil rights. The Supreme Court's intervention is required to reaffirm and enforce the principles outlined in these precedents, ensuring that lower courts adhere to the established legal standards.

The lower court's ruling also reflects a failure to adequately address the constitutional concerns raised by the petitioner. The court's decision did not sufficiently consider the impact of immunity doctrines on the petitioner's ability to

seek redress for constitutional violations, thereby undermining the fundamental rights guaranteed by the Constitution.

This oversight has significant implications for the protection of individual rights and the proper application of constitutional principles. The Supreme Court's review is essential to address these concerns and ensure that constitutional protections are upheld in accordance with established legal standards.

The erroneous interpretation by the lower court has broader implications for future cases and the development of legal precedents. The decision has introduced uncertainty and potential confusion into the application of immunity doctrines and the protection of constitutional rights, affecting the ability of individuals to seek justice in similar cases.

The Supreme Court's review is critical to resolving these issues and providing clear guidance on the proper interpretation and application of legal standards. By addressing the lower court's errors, the Supreme Court will contribute to the stability and predictability of the legal system, ensuring that future cases are resolved in a manner consistent with established principles of justice.

Given the substantial errors in the lower court's decision, corrective action by the Supreme Court is necessary to restore legal consistency and uphold the integrity of the judicial system. The Court's intervention will provide an authoritative resolution to the legal issues presented, ensuring that the correct legal standards are applied and that the petitioner receives a fair and just outcome.

The Supreme Court's guidance will also reinforce the rule of law and ensure that lower courts follow established precedents, promoting fairness and consistency in the legal system. By correcting the lower court's erroneous interpretation, the Supreme Court will help preserve the principles of justice and uphold the rights of individuals seeking redress for constitutional violations.

CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that this Court grant this Writ of Certiorari.

Submitted this 26th day of August 2024

Respectfully Submitted,



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No. _____

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QUANNAH L. HARRIS - PETITIONER

VS.

THE SECRETARY OF STATE ET AL - RESPONDENT

DECLARATION

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 26th day of August 2024.



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