**No. 24-597**

# In the Supreme Court of the United States

JONATHAN BRUNSON,
*Petitioner*,
v.

JOSHUA H. STEIN, ET AL.,
*Respondents*.

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

## BRIEF IN OPPOSITION

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## QUESTION PRESENTED

Does a dismissal under *Heck v. Humphrey*, 512 U.S. 477 (1994), categorically count as a "strike" for "fail[ure] to state a claim upon which relief may be granted" under the Prison Litigation Reform Act, 28 U.S.C. § 1915(g)?

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## INTRODUCTION

Congress enacted the Prison Litigation Reform Act to alleviate the burden on federal courts imposed by prisoner litigation. Under the PLRA, a prisoner may not seek *in forma pauperis* status if he has, "on 3 or more prior occasions," brought a federal action that was dismissed as "frivolous, malicious, or [because it] fails to state a claim upon which relief may be granted." 28 U.S.C. § 1915(g). This "three-strikes" rule recognizes that "a litigant whose filing fees and court costs are assumed by the public, unlike a paying litigant, lacks an economic incentive to refrain from filing frivolous, malicious, or repetitive lawsuits." *Neitzke v. Williams*, 490 U.S. 319, 324 (1989).

This case raises the question whether dismissals based on *Heck v. Humphrey*, 512 U.S. 477 (1994), count as "strikes" under the PLRA. In *Heck*, this Court held that a § 1983 claim that requires a court to question the validity of an underlying criminal conviction is barred unless a plaintiff shows that the proceeding terminated in his favor. *Id.* at 487.

Respondents do not deny that the Courts of Appeals have approached this question somewhat differently. But Petitioner overstates the extent of the division. Five circuits now hold that *Heck*-based dismissals automatically count as PLRA strikes, whereas two circuits take a case-by-case approach that will often lead to the same result. This modest division among the circuits is not one this Court needs to resolve now.

Even if this Court were inclined to eventually take up this question, this case would be a poor candidate for it to do so. No matter how this Court might resolve the question presented, Petitioner will be in the same position, as he has now accumulated at least three PLRA strikes under any method of counting. In addition, there is an additional relevant question on the proper application of the PLRA to *Heck*-based dismissals that is currently percolating in the Courts of Appeals: whether a Heck-based dismissal is per se frivolous. A better candidate for review would raise this additional question squarely.

Finally, this Court's review is not needed because the Fourth Circuit got it right. *Heck* itself makes clear that favorable termination of the underlying criminal proceeding is a required element of a prisoner § 1983 claim. 512 U.S. at 483-86. And, by definition, a plaintiff who fails to plead a required element has "fail[ed] to state a claim upon which relief may be granted." 28 U.S.C. § 1915(g).

This Court should deny the petition.

## STATEMENT

Petitioner Jonathan Brunson was convicted and sentenced on sexual-abuse charges and is residing in a state facility in North Carolina. Pet. 3a. He filed this § 1983 lawsuit *pro se*, bringing a variety of claims relating to a previous tort lawsuit he filed in a state administrate agency. *Id.* Brunson claims here that the North Carolina Attorney General and seventeen other state defendants allegedly conspired to engage in improper litigation conduct in that tort proceeding.

CA4 JA 26-27. As relief, he asked for $312 million in damages. *Id.*

In his complaint, Petitioner acknowledged that he had previously filed at least three other lawsuits under 42 U.S.C. § 1983, all of which had been dismissed under *Heck*. CA4 JA 18-19.

Petitioner filed an application to proceed *in forma pauperis*. The district court denied that request, holding that he was ineligible to do so under the Prison Litigation Reform Act. Pet. 16a-17a. Specifically, the court held that Petitioner had "on 3 or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it . . . fails to state a claim upon which relief may be granted." Pet. 17a (quoting 28 U.S.C. § 1915(g)).

Petitioner chose to pay the filing fee. The district court therefore proceeded to consider Petitioner's complaint on the merits. The court dismissed the complaint for failure to state a claim, for two reasons. CA4 JA 31. First, the Court held that Petitioner's claims were barred by the *Rooker-Feldman* doctrine because they required a federal court to directly review a state administrative proceeding. CA4 JA 29; *see Reed v. Goertz*, 598 U.S. 230, 235 (2023) (explaining that *Rooker-Feldman* "prohibits federal courts from adjudicating cases brought by state-court losing parties challenging state-court judgments"). Second, the court held that many of the defendants in this lawsuit were entitled to quasi-judicial immunity. CA4 JA 30. In light of these rulings, the court expressly concluded that Petitioner's claims were "frivolous." CA4 JA 33.

On appeal, the Fourth Circuit appointed counsel and asked the parties to brief whether *Heck*-based dismissals count as strikes under the PLRA. Pet. 4a. The Fourth Circuit answered that question in the affirmative. It explained that, when a prisoner brings a § 1983 claim that necessarily presupposes the invalidity of their conviction, *Heck's* favorable-termination requirement is an essential element of that claim. Pet. 7a (citing *Heck*, 512 U.S. at 484, 486). And when a case is dismissed for failure to plead an essential element, that dismissal is necessarily one for failure to state a claim. Pet 8a. The Fourth Circuit therefore held that Petitioner had accumulated three strikes under § 1915(g) of the PLRA and could not proceed *in forma pauperis* in this lawsuit.[1]

Petitioner now seeks certiorari.

## REASONS FOR DENYING THE PETITION

### I. Petitioner Exaggerates the Extent and Importance of the Circuit Split.

Respondents do not deny that the Courts of Appeals have taken different approaches to the question presented here. As this Court has itself recognized, some Courts of Appeals treat "*Heck* dismissals [as] for failure to state a claim," but "[n]ot all Courts of Appeals accept that view." *Lomax v. Ortiz-Marquez*, 140 S. Ct. 1721, 1724 n.2 (2020). The Fourth Circuit similarly noted below that the question

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[1] Following the Fourth Circuit's decision that he was subject to the PLRA's three-strikes bar, Petitioner paid the filing fee and filed a merits brief *pro se*. That appeal remains pending. *Brunson v. Stein*, 5:21-CT-3063-FL (E.D.N.C. Jan. 28, 2022), *appeal docketed*, No. 22-7228 (4th Cir.).

presented "is the subject of an entrenched circuit split." Pet. 6a.

However, the split is far less robust than Petitioner claims. Five circuits, including the Fourth Circuit below, have adopted the majority view that *Heck* dismissals automatically count as strikes. In the two minority circuits, that conclusion is not automatic, but courts will often reach the same result through a case-by-case analysis. The remaining circuits have issued conflicting pronouncements on the issue or have yet to address it. Given these circumstances, there is no pressing need for this Court to grant review in this case.

### A. The Court of Appeals are not as divided as Petitioner claims.

In the decision below, the Fourth Circuit joined four of its sister circuits, which have all held that *Heck* dismissals automatically count as strikes under the PLRA. Pet. 7a; *see Garrett v. Murphy*, 17 F.4th 419, 427 (3d Cir. 2021); *Colvin v. LeBlanc*, 2 F.4th 494, 497–99 (5th Cir. 2021); *Smith v. Veterans Admin.*, 636 F.3d 1306, 1312 (10th Cir. 2011); *In re Jones*, 652 F.3d 36, 38 (D.C. Cir. 2011). These Courts of Appeals recognize that "*Heck* dismissals are necessarily for failure to state a claim," and thus fall squarely within the category of cases that Congress directed to be counted as strikes. Pet. 6a.

Respondents acknowledge that other Courts of Appeals have approached the question presented somewhat differently. Specifically, at least two other circuits—the Second and the Ninth—have adopted a

case-by-case approach. In those circuits, a *Heck* dismissal does not *automatically* constitute a strike. But they will often count as one anyway based on the specific circumstances of a dismissal.

Start with the Ninth Circuit. Although that court has stopped short of categorically treating a *Heck* dismissal as a strike, it has adopted a rule that will lead to the same outcome in many cases. Specifically, the Ninth Circuit has held that a *Heck* dismissal "may constitute a PLRA strike for failure to state a claim when *Heck*'s bar to relief is obvious from the face of the complaint." *Washington v. L.A. Cnty. Sheriff's Dep't*, 833 F.3d 1048, 1055 (9th Cir. 2016). It has further clarified that the *Heck* bar is "obvious from the face of the complaint" when the complaint makes clear that success on the claim would necessarily imply that the underlying conviction was unlawful. *Ray v. Lara*, 31 F.4th 692, 698 (9th Cir. 2022).

Under this approach, in many cases where a complaint is dismissed as *Heck*-barred, that dismissal will be counted as a strike under the PLRA. And that is exactly how the Ninth Circuit has subsequently applied its rule. *See id.* (holding that a dismissal under *Heck* was facially obvious because the complaint made clear that the claim's success would necessarily imply that the plaintiff's conviction was unconstitutional). Thus, in many cases, the end result in the Ninth Circuit will be no different from that in the circuits following the majority rule.

The story is much the same in the Second Circuit. Again, respondents do not deny that, like the Ninth

Circuit, the Second Circuit has rejected the view that *Heck*-based dismissals automatically count as strikes. But once again, the doctrinal differences between the Second Circuit's approach and the decision below will often be entirely theoretical.

Specifically, the Second Circuit has held that "whether a *Heck* dismissal qualifies as a strike depends on the circumstances." *Cotton v. Noeth*, 96 F.4th 249, 257 (2d Cir. 2024). The relevant inquiry under this view "is whether the dismissal turned on the merits or whether it was simply a matter of sequencing or timing." *Id.* The Court explained that a dismissal is "on the merits"—and therefore counts as a strike—in "cases where it is apparent from the complaint that *Heck* is an irremediable bar" to the plaintiff recovering on his claim. *Id.* at 258. This will be true when, for example, "it is clear from a complaint that a plaintiff can no longer challenge an underlying conviction." *Id.*

Thus, while the Second Circuit's case-by-case approach certainly diverges from the bright-line rule adopted by other circuits, Petitioner exaggerates its importance. In many cases, the result will be the same and the *Heck*-based dismissal will count as a strike.

To try and deepen the split, Petitioner points to cases from the First and Seventh Circuits. However, on examination, the law in these circuits remains murky. And there is every reason to believe that those courts might choose to embrace the majority rule if they were presented squarely with the question.

As for the Seventh Circuit, Petitioner points to an unpublished case where a panel stated that *Heck* deals with a claim's timing, rather than its merits. Pet. 12 (quoting *Mejia v. Harrington*, 541 F. App'x 709, 710 (7th Cir. 2013)). But it is far from clear that this statement represents the law of the Seventh Circuit. As an initial matter, the statement was largely dicta—the issue in that case was whether the district court was correct to deny the plaintiff's motion for reconsideration. *Mejia*, 541 F. App'x at 709-10. After addressing that issue, the panel included a "brief word about a portion of the district court's order" counting a *Heck* dismissal as a strike. *Id.* at 710. It then opined that a *Heck* dismissal should not automatically be considered as one for failure to state a claim because it "deal[s] with timing rather than the merits of litigation." *Id.*

Although this reasoning is, of course, contrary to the decision below, it is not the law of the Seventh Circuit. Not only was the statement dicta, it arose in an unpublished case that has no precedential value. *See id.*, No. 13-1064, slip op. at 1 (cautioning that the case was a "NONPRECEDENTIAL DISPOSITION); *Courtney v. Butler*, 66 F.4th 1043, 1049 n.1 (7th Cir. 2023) (noting that the Court's decision in *Mejia* was "non-precedential").

Moreover, there is reason to believe that the reasoning in *Mejia* might not be embraced by future Seventh Circuit panels. In a previous, published decision, the Seventh Circuit stated that "the Heck requirement is an essential element of a § 1983 claim." *Dixon v. Chrans*, 101 F.3d 1228, 1230 (7th Cir. 1996).

It is true that *Dixon* did not involve the issue of counting strikes under the PLRA—it was instead focused on the underlying question of whether the claims there were barred by *Heck* in the first place. *Id.* So, like *Mejia*, *Dixon* is not controlling law on the question presented in the Seventh Circuit either. But it is strong evidence that, if the Seventh Circuit *were* confronted with the question, it would align with the majority view.

The state of play in the First Circuit is similarly uncertain. Although Petitioner acknowledges that the First Circuit has not expressly addressed the question presented, he argues that the First Circuit's "treatment of *Heck* dismissals strongly signals" that it would not treat them as categorical strikes under the PLRA. Pet. 13. Like the Seventh Circuit, however, the First Circuit's signals have been decidedly mixed.

As Petitioner notes, the First Circuit has stated that "[w]hether *Heck* bars § 1983 claims is a jurisdictional question." *O'Brien v. Town of Bellingham*, 943 F.3d 514, 529 (1st Cir. 2019). Respondents agree that dismissals for lack of subject-matter jurisdiction are not generally treated as strikes. *See* Pet. 13 (citing cases). However, the First Circuit has elsewhere described the favorable-termination requirement as an "element" of plaintiff's claim. *Figueroa v. Rivera*, 147 F.3d 77, 81 (1st Cir. 1998). And as the Fourth Circuit rightly held below, the failure to plausibly allege a claim's "element" constitutes a failure to state a claim. Pet. 8a. So it is not at all clear that, were it to squarely address the

question presented, the First Circuit would favor Petitioner's position.[2]

In sum, Respondents do not deny that there is a circuit split on the question presented. But Petitioner has overstated its extent and its importance. At most, it is the subject of a relatively lopsided 5-2 split, with the picture murky or unaddressed in the remaining circuits. And even in the two circuits on the short end of the split, the result will often be the same depending on the circumstances of a particular case. Given this landscape, Respondents respectfully submit that this Court need not intervene here.

### B. The question presented has no practical impact on Petitioner.

Even if this Court were to believe that the time is ripe to resolve the question presented, this case would be a poor candidate for it to do so.

Most notably, proceedings in this Court will have no practical impact on Petitioner. Below, after the district court denied *in forma pauperis* status, Petitioner chose to pay the filing fee and proceed on his claims. The district court then reviewed those claims—which allege a vast yet unexplained

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[2] The Eleventh Circuit has also issued conflicting statements of a similar nature. That court has described *Heck* dismissals as jurisdictional, but also stated that favorable termination "deprives the plaintiff of a cause of action." *Harrigan v. Metro Dade Police Dep't Station #4*, 977 F.3d 1185, 1191 n.4 (11th Cir. 2020). Like the First Circuit, it is therefore unclear how the Eleventh Circuit would reconcile these prior statements in the context of counting PLRA strikes.

conspiracy among a variety of state actors to defeat his state tort lawsuit—and explicitly dismissed them both for failing to state a claim and as "frivolous." CA4 JA 31, 33. And again on appeal, after the Fourth Circuit denied *in forma pauperis* status, Petitioner chose to pay the filing fee and seek appellate review on the merits of his claims. *Supra* at n.1. That merits appeal remains pending.

Thus, application of the PLRA's three-strikes bar did not prevent Petitioner from seeking judicial redress for alleged violations of his rights. Instead, the bar served its purpose: It required a frequent-filing inmate to bear a small portion of the burden that his repeated, unmeritorious lawsuits impose on the legal system, while still allowing him to have his day in court.[3]

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[3] In all, Petitioner has filed at least twelve lawsuits against North Carolina state officials in the Eastern District of North Carolina. *Brunson v. Herring*, 5:23-HC-2152-D-RJ (E.D.N.C. Nov. 1, 2023), *aff'd*, No. 24-6059 (4th Cir. June 4, 2024); *Brunson v. Ammons*, 5:19-CT-3081-D (E.D.N.C. Jan. 31, 2020), *aff'd*, No. 20-6216 (4th Cir. June 19, 2020); *Brunson v. Hooks*, 5:19-HC-2191-FL (E.D.N.C. Aug. 14, 2019); *Brunson v. North Carolina*, 5:17-CT-3083-D (E.D.N.C. Oct. 11, 2017), *aff'd*, No. 18-6102 (4th Cir. May 21, 2018); *Brunson v. Taylor*, 5:16-HC-2222-FL (E.D.N.C. Aug. 28, 2017); *Brunson v. Obama*, 5:14-CT-3291-FL (E.D.N.C. June 9, 2015); *Brunson v. Solomon*, 5:14-HC-2009-FL (E.D.N.C. Jan. 26, 2015), *aff'd*, No. 15-6145 (4th Cir. June 18, 2015); *Brunson v. N.C. Dep't of Social Servs.*, 5:09-CT-3063-FL (E.D.N.C. Aug. 30, 2013); *Brunson v. Cooper*, 5:12-HC-2077-D (E.D.N.C. Sept. 21, 2012); *Brunson v. Off. of the Governor*, 5:11-CT-3252-FL (E.D.N.C. Jan. 4, 2012); *Brunson v. Hamilton*, 5:11-CT-3138-FL (E.D.N.C. Nov. 28, 2011). He voluntarily dismissed two of these lawsuits. All the others were dismissed on the

Moreover, in light of the district court's frivolousness finding below, as well as its dismissal of the complaint for failure to state a claim, Petitioner now has indisputably accumulated at least three PLRA strikes—even putting aside the *Heck* dismissals that are the focus of his petition. *See Brunson v. Stein*, 5:21-CT-3063-FL (E.D.N.C. Jan. 28, 2022) (dismissing case both for failure to state a claim and as frivolous); *Brunson v. North Carolina*, 5:17-CT-3083-D (E.D.N.C. Oct. 11, 2017) (failure to state a claim); *Brunson v. Off. of the Governor*, 5:11-CT-3252-FL (E.D.N.C. Jan. 4, 2012) (frivolous).

As a result, even if Petitioner were to prevail here, he will be subject to the PLRA's three-strikes bar going forward.

The practical stakes to Petitioner here are therefore miniscule. The only relief he could conceivably receive if he prevails on the question presented is a refund of his filing fees *in this case*—

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pleadings, variously for failure to state a claim, as barred by *Heck*, under the statute of limitations, under *Rooker-Feldman*, or for lack of jurisdiction. Petitioner appealed four of these dismissals; the Fourth Circuit affirmed in all four cases. Petitioner has also filed three other petitions for a writ of certiorari to this Court, all of which were denied. *See Brunson v. Herring*, 2024 WL 5011806 (U.S. Dec. 9, 2024) (No. 24-5673); *Brunson v. North Carolina*, 586 U.S. 1082 (Jan. 7, 2019) (No. 18-6426); *Brunson v. Taylor*, 577 U.S. 964 (Nov. 2, 2015) (No. 15-6125). In response to his most recent petition, the Court issued the following order: "As the petitioner has repeatedly abused this Court's process, the Clerk is directed not to accept any further petitions in noncriminal matters from petitioner unless the docketing fee required by Rule 38(a) is paid and the petition is submitted in compliance with Rule 33.1." *Herring*, 2024 WL 5011806, at *1.

fees he has paid to litigate "frivolous" claims. CA4 JA 33. If he were to ever file future litigation, whatever the outcome in this litigation, he would have to pay the filing fees. This Court does not usually grant plenary review in cases with such low stakes to the filing party. *See* Stephen M. Shapiro et al., Supreme Court Practice § 4.4(f) (11th ed. 2019) (noting that this Court generally avoids granting review where its "resolution of a clear conflict" would be "irrelevant to the ultimate outcome of the case").

Moreover, there is an additional factor that make it even less likely that the minor differences among the Courts of Appeals on the question presented will be of practical importance—to Petitioner, or other similarly situated plaintiffs. Some courts have held that a *Heck*-based dismissal is one that is necessarily frivolous—and thus falls under a separate ground for counting it as a strike under the PLRA. *See Hamilton v. Lyons*, 74 F.3d 99, 102 (5th Cir. 1996). Respondents have not pressed this issue in this case, and the Fourth Circuit below took pains to emphasize that "[n]othing in [its] opinion forecloses this as an alternative ground for finding a strike in future cases." Pet. 5a n.2.

Although this issue is not before this Court, it does bear on the importance of the question presented. If a *Heck*-based dismissal is per se frivolous, then it is of little practical importance whether it *also* constitutes a failure to state a claim. Should this Court wish to clarify the status of *Heck*-based dismissals on the overall PLRA framework, it should wait for a case that presents the frivolousness question as well.

## II. The Fourth Circuit Correctly Held that *Heck* Dismissals Count as PLRA Strikes.

Review is also not needed here because the Fourth Circuit got it right. When a district court dismisses a complaint as barred by *Heck*, that dismissal should categorically count as a strike under the PLRA.

As the Fourth Circuit explained, when a prisoner brings a § 1983 claim that necessarily presupposes the invalidity of their conviction, *Heck's* favorable-termination requirement is an essential element of that claim. Pet. 7a. This conclusion follows from *Heck* itself. Section "1983 creates a species of tort liability." *Heck*, 512 U.S. at 483 (quoting *Memphis Cmty. Sch. Dist.* v. *Stachura,* 477 U. S. 299, 305 (1986)). Thus, a "§ 1983 claim generally derives its 'elements of damages and the prerequisites for their recovery' from whatever common-law tort is most analogous to that § 1983 claim." Pet. 9a (quoting *Heck*, 512 U.S. at 483-86).

As relevant here, for § 1983 claims that "necessarily require the plaintiff to prove the unlawfulness of his conviction or confinement," "[t]he common-law cause of action for malicious prosecution provides the closest analogy." *Heck*, 512 U.S. at 484, 486. It follows then that § 1983 claims of this kind import the elements of a common-law malicious prosecution claim. *Id*. at 486. And "[o]ne element that must be alleged and proved in a malicious prosecution action is termination of the prior criminal proceeding in favor of the accused." *Id.* at 484. Unless a plaintiff does so, he lacks a "complete and present cause of

action." *McDonough v. Smith*, 588 U.S. 109, 119 (2019).

This reasoning makes clear that a *Heck*-based dismissal for failure to allege favorable termination is one for failure to state a claim. As the Fourth Circuit explained, "[a] cause of action is the 'group of operative facts'—also known as 'elements'—'giving rise to one or more bases for suing.'" Pet. 8a (quoting *Cause of Action*, Black's Law Dictionary (12th ed. 2024)). And "if one or more elements is missing," "a cause of action does *not* exist." Pet. 8a. Thus, it is axiomatic that if a plaintiff fails to allege an essential element of a claim, the lawsuit must be dismissed for failure to state a claim. *See, e.g.*, *Arbaugh v. Y & H Corp.*, 546 U.S. 500, 507, 514 (2006).

Petitioner disputes this account. He argues that a dismissal under *Heck* does not implicate the merits of a plaintiff's claim, but instead merely a claim's "timing." Pet. 12-13. A *Heck*-barred claim, Petitioner insists, is merely "unripe for adjudication" because it "was brought too early." Pet. 18-19 (citations omitted).

As the Fourth Circuit rightly explained, this account misreads *Heck*. This Court could not have been clearer that its rule was rooted in the merits of a prisoner's claim, *not* the claim's timing. The Court stated: "We do not engraft an exhaustion requirement upon § 1983, but rather deny the existence of a cause of action." *Heck*, 512 U.S. at 489. It went on to emphasize that "a prisoner . . . *has no cause of action* under § 1983 unless and until the conviction or sentence is reversed, expunged, invalidated, or

impugned by the grant of a writ of habeas corpus." *Id.* (emphasis added). And it elsewhere stated that a *Heck*-barred claim is not "cognizable under § 1983." *Id.* at 487; *see also FDIC v. Meyer*, 510 U.S. 471, 476 (1994) (defining the term "cognizable" as when a plaintiff satisfies the elements required "to provide a cause of action").

What these statements recognize is that when a plaintiff brings a claim that necessarily presupposes the invalidity of a criminal conviction, but that underlying conviction remains intact, the claim fails on the merits. The fact that the plaintiff *might someday* have a viable claim—one that arises only in the rare event that his criminal conviction is invalidated—does nothing to change that conclusion. In other words, a prisoner's § 1983 claim in this context is not simply awaiting accrual. The claim does not exist—and will, in the vast majority of cases, *never exist*—in the first place.

## CONCLUSION

The petition for a writ of certiorari should be denied.

Respectfully submitted,

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December 31, 2024