No. 24-6671

In the
Supreme Court of the United States

ISAAC D. KOCH,
Petitioner,

v.

STATE OF IOWA,
Respondent.

On Petition for a
Writ of Certiorari to
The Supreme Court of Iowa

PETITION FOR WRIT OF CERTIORARI

ISAAC D. KOCH,
Petitioner.
104 Patton avenue
Brighton, Alabama, 35020
(877) 635-4742

QUESTIONS PRESENTED

What is the difference between interfering with an official act and refusing an official crime?

What is the effect, when statute disallows all physical resistance without exception, other than to abolish the police?

LIST OF PARTIES

The State of Iowa, Respondent, brought charges as plaintiff in the District Court of Fremont County, Iowa.

Isaac D. Koch was the defendant in District Court, and is Petitioner in the present appeal.

RELATED CASES

Iowa Fremont County District Court case no. SMMG030661 – Criminal case

Iowa Supreme Court case no. 23-2111 – Denied petition for mandamus relating to car

Iowa Supreme Court case no. 24-0312 – Petition for redress of judgment of guilt treated as application for discretionary review; denied March 5, 2024

Iowa Supreme Court case no. 24-0687 – Petition for certiorari over denied District Court rehearing; denied May 16, 2024

Iowa Supreme Court case no. 24-1032 – Petition for certiorari over judgment of guilt; denied on rehearing August 30, 2024; Appendix C, App.g.

Iowa Fremont County District Court case no. CVCV025739 – Complaint for replevin on car

Platte County District Court case no. CI24-351 – suit for libel

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PETITION

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

REPORTED OPINIONS

The judgment of the Iowa Supreme Court denying certiorari appears at Appendix A, App.c, and is unpublished.

BASIS FOR JURISDICTION

The Iowa Supreme Court denied certiorari on July 24, 2024. A copy of that decision appears at Appendix A, App.c. A timely petition for rehearing was denied on August 30, 2024, and a copy of the order denying rehearing appears at Appendix C, App.g.

The People of our United States vest in the U. S. Supreme Court jurisdiction to hear this matter under the U. S. Constitution, Article III, Section 2, which states, in part:

> The judicial Power shall extend to all Cases, in Law and Equity, arising under this Constitution [and] the Laws of the United States . . . .
> . . . [In these] the supreme Court shall have appellate jurisdiction, both as to Law and Fact, with such Exceptions, and under such Regulations as the Congress shall make.

The Congress, in 28 U. S. C. § 1257(a), provides appellate jurisdiction for a writ of certiorari, when a

> [f]inal judgment[] . . . rendered by the highest court of a State . . . [exists] where the validity of a statute of any State is drawn in question on the ground of its being repugnant to the Constitution . . . .

The time limit for a petition for certionari in a criminal case shall be as Supreme Court rules provide. 28 U. S. C. § 2101(d). Rule 13.1 provides that a petition for writ of certiorari "is timely when it is filed with the Clerk of this Court within 90 days

after entry of the judgment." Rule 13.3 includes an order on rehearing. Rehearing concluded on August 30, 2024. Ninety days conclude on November 28, a holiday. The Supreme Court building is closed the next day. Rule 30.1 provides an extension until December 2, 2024.

The Congress declares that the federal supreme court may tax without limit, in 28 U. S. C. § 1911. A developing understanding of the federal Constitution prompts the conclusion that fees are never required to seek justice.

CONSTITUTIONS AND STATUTE INVOLVED

The Iowa Constitution, article I § 8, provides that

> The right of the people to be secure in their persons, houses, papers and effects, against unreasonable seizures and searches shall not be violated; and no warrant shall issue but on probable cause, supported by oath or affirmation, particularly describing the place to be searched, and the persons and things to be seized.

The U.S. Constitution reminds us that Judges take an oath to discharge what text in the Constitution is written. Article IV, in relevant part:

> This Constitution, and the Laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.

The authority of the State of Iowa to stand before this Supreme U.S. Court turns on its acceptance into the federation. President Polk signed the act of Congress that admitted Iowa into the Union, on December 28, 1846.

The fourth amendment provides that

> The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or

affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

The fifth amendment secures due process before one is deprived of liberty:

> No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a grand jury, except in cases arising in the land or naval forces, or in the militia, when in actual service in time of war or public danger; nor shall any person be subject for the same offense to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.

The fourteenth amendment, section 1, in part:

> No State shall . . . deprive any person of life, liberty, or property, without due process of law . . . .

Iowa Code 2023 § 723.4(1)(*a*) [sic] condemns behavior in a person who

> Engages in fighting or violent behavior in any public place or in or near any lawful assembly of persons, provided, that participants in athletic contests may engage in such conduct which is reasonably related to that sport.

Iowa Code 2023 § 719.1(1)(*b*) [sic] condemns behavior in a person when providing that

> Interference with official acts is a simple misdemeanor. In addition to any other penalties, the punishment imposed under this paragraph shall include assessment of a fine of not less than two hundred fifty dollars.

Iowa Code 2023 § 719.1(1)(*a*) defines "interference with official acts" in that

> A person commits interference with official acts when the person knowingly resists or obstructs anyone known by the person to be a peace officer, jailer, emergency medical care provider under chapter 147A, medical examiner, or fire fighter, whether paid or volunteer, or a person performing bailiff duties pursuant to section 602.1303, subsection 3, in the performance of any act which is within the scope of the lawful duty or authority of that officer, jailer, emergency medical care provider under chapter 147A, medical examiner, or fire fighter, whether paid or volunteer, or a person performing bailiff duties pursuant to section 602.1303, subsection 3, or who knowingly resists or obstructs the service or execution by any authorized person of any civil or criminal process or order of any court.

STATEMENT OF CASE

In this case, a poor man was found legally in his car in front of a public library with his dog. A sheriff's deputy approached, possessed of the presumption that the only person who could dispel the deputy's suspicions was the man in the car. You already know what happens to justice. What do you think happens to the car? to the right to appeal? to the dog?

The facts, as tried to the jury, are as follows. Isaac Koch, the author of the instant petition, was lawfully parked directly in front of one corner of a public library on December 11, 2023, when he noticed an open door on a public school. All are agreed that an open door is a safety issue.

The large town of Sidney, Iowa, is the county seat of the extreme southwest county, called Fremont county. The U. S. highway detours outside of the little city that boasts of its rodeo accomplishments. An idyllic courthouse prominently occupies the center of the town, rimmed to the north with what looked to be a row of wild plum ready to break into white blossom (across the street from a suitable post office). An iconic gas station sits opposite the other street-facing corner of the post office. The old highway splits to neatly send each lane of traffic on opposite sides of this courthouse, and large signs direct the driver to the entrance of the public library, where Mr. Koch is waiting in his warm car to conduct some business when it opens at 11 a.m.

Sidney is home to the consolidated public schools. The library occupies the inside corner of the middle school parking lot, across from the school (but beside the old highway). Across from the school, beside the library where Mr. Koch is waiting, is a

building containing the school's gym. Students have entered this building, and the door is left ajar.

Mr. Koch steps out of his car, and a few paces down the sidewalk, with a closed laptop computer. Before stepping inside, he encounters no fences, and opens no gates. Just behind him, an adult enters. After a short conversation, he exits. He returns to his car, and the door is secured. Shortly, he conducts business in the library. All this time, you may think, a sheriff deputy's SUV quietly occupies the center of the large parking lot. Mr. Koch soon drives away.

The following day, December 12, Mr. Koch returns to the same parking spot, the jury learns. It was about half-past 8. The school effects a general panic. An officer parks beside the car, but not entirely inside the parking stall.

Without activating emergency lights, Officer Logan Roberts approachs the parked car. He demands the window be opened, without presenting a warrant or reason. Mr. Koch shortly exits, leaving the happy dog inside the warm car. The officer falsely accuses Koch of operating with an expired Nebraska license—he counters that he holds a valid Alabama license. Roberts observed that yesterday Koch walked through the school door—Koch explains that it needed closed. Roberts insists that Koch has no license to be present—Koch objects, then announces he is leaving.

Officer pushes Koch's right shoulder. Koch circles his arm to knock off Robert's hand. Roberts grabs the arm, and begins shouting for Koch to get on the ground. Koch prefers to remain upright, and tells Roberts to get his hands off him.

Officer Roberts subdues Koch. He is to testify that only then did he inform Koch he is under arrest. Koch's right elbow suffers an injury worth two stitches. Koch is charged with two misdemeanors, Iowa Code §§ 723.4(1)(A) and 719.1(1)(B). He is booked. A friend posts his bail on December 15, and judging from the record, Koch is released to homelessness in the 2023 Iowa winter.

The case progressed to trial on January 24, 2024. It was audio-recorded from the bench, under Iowa statute. The jury returned verdicts of "Guilty of Disorderly Conduct[ ]- Fighting/Violent Behavior" and "Guilty of Interference with Official Acts". The Court entered judgment at once.

Koch quickly serves his sentence. He is set at liberty with the belief that the statutes are void.

We pass over several post-judgment proceedings. Likewise we pass over petitions to the Iowa Supreme Court for certiorari, except to list them in the section on related cases. Following District Court procedure, review by another judge was completed on March 25, 2024. Appendix D, App.i. A petition for certiorari in the Iowa Supreme Court was denied on July 24, 2024. Appendix A, App.c. The petition being heard by a majority, it was denied on August 30, 2024. Appendix C, App.g.

REASONS FOR GRANTING THE WRIT

A. THE RECORD OF ERROR

One witness testified that Koch pushed Officer. Another testified the opposite. Without a corroborating witness, there is not enough evidence to believe that Koch

did so. "Evidence is considered substantial when reasonable minds could accept it as adequate to reach a conclusion." *State v. Garrity,* 765 N. W. 2d 592, 595 (Iowa 2009).

There is no evidence of an official conversation. Officer Roberts wanted to alleviate his suspicions, but evidence is required to conduct a search. Iowa Const. I-8, U. S. Const. amdt. IV.

B. THIS CASE IS A SUITABLE VEHICLE TO ADDRESS THE QUESTIONS

This is a criminal case, promptly tried to the jury. No stronger conflict exists under civil government. This is the wine of the wheels of justice—not the ground coffee.

There is no evidence of nefarious intent. Mr. Koch found an open door to a public school, and acted to have it closed. The threat was obvious, and the solution was urgent. He explained he wanted to guard the door, until the authority dismissed him, and to pass the time he would continue studies. The jury was able to review the time notes he presented in support of this point. You cannot lock a door from the outside.

The damages are enduring. The damage to Koch's reputation is underscored in the press, and needlessly afflicts his employment. It is particularly painful to witness the loss of a useful car and helpful dog.

C. THIS CASE RAISES A PRESSING FEDERAL PROBLEM

To really understand the scope of this problem, the two charges must be fully addressed one at a time. The first charge is disorderly conduct under Iowa Code

§ 723.4(1)(A). The second charge is interfering with an official act under Iowa Code § 719.1(1)(B).

1. Disorderly Conduct

Iowa Code 2023 § 723.4(1)(*a*) [sic] condemns behavior in a person who

> Engages in fighting or violent behavior in any public place or in or near any lawful assembly of persons, provided, that participants in athletic contests may engage in such conduct which is reasonably related to that sport.

You get needless anxiety and build unnecessary distrust with damnation of helpful behavior. If you want to hear it straight, hear from the one who eagerly trusted himself to the jury and cheerfully endured consequential imprisonment.

Disorderly conduct is defined as fighting or violence *but not both.* Since it is only either one or the other, it is neither. Because this phrase defines "disorderly conduct," the phrase itself has lost meaning. The word "or" does not mean the word "and."

The semblance of a meaning has no effective meaning. If simply *physical conflict* is a crime, one should expect to find the officer charged for the act. A law that seems to outlaw all government acts is obviously void.

This idea that you can outlaw police behavior informs citizen interaction. Soon enough, the idea that government can be outlawed is given grave attention. Your schoolteachers might call it circular reasoning.

We don't know what happened to the dog in this case yet, but in St. Louis, when police kill a dog, the verdict is $750,000. According to the press, it was a no-knock raid after a gas bill was unpaid.

The broad application of disorderly conduct charges leaves people feeling it is unfair. *See* "Doing Away with Disorderly Conduct" by R. Moran in 63 Boston C. L. R. 65 (2022). *See also* "Disorderly Conduct" by M. Cicchini in 9 LMU L. R. 50 (2021).

"The idea that any legislature, state or [f]ederal, can conclusively determine for the people and for the courts that what it enacts in the form of law, or what it authorizes its agents to do, is consistent with the fundamental law is in opposition to the theory of our institutions. The duty rests upon all courts, [f]ederal and state, when their jurisdiction is properly invoked, to see to it that no right secured by the supreme law of the land is impaired or destroyed by legislation." *Smyth v. Ames,* 169 U. S. 466, 528 (1898).

2. Interfering with Official Acts

Iowa Code 2023 § 719.1(1)(*b*) [sic] condemns behavior in a person when providing that

> Interference with official acts is a simple misdemeanor. In addition to any other penalties, the punishment imposed under this paragraph shall include assessment of a fine of not less than two hundred fifty dollars.

Iowa Code 2023 § 719.1(1)(*a*) defines "interference with official acts" in that

> A person commits interference with official acts when the person knowingly resists or obstructs anyone known by the person to be a peace officer, jailer, emergency medical care provider under chapter 147A, medical examiner, or fire fighter, whether paid or volunteer, or a person performing bailiff duties pursuant to section 602.1303, subsection 3, in the performance of any act which is within the scope of the lawful duty or authority of that officer, jailer, emergency medical care provider under chapter 147A, medical examiner, or fire fighter, whether paid or volunteer, or a person performing bailiff duties pursuant to section 602.1303, subsection 3, or who knowingly resists or obstructs the service or execution by any authorized person of any civil or criminal process or order of any court.

The jury determined guilt under this count. The seizure of Koch's person was obviously unlawful. The phrase *official act* is hopelessly vague.

The seizure of Koch's person was unlawful. Officer Roberts testified that he did not observe Koch committing a crime in his car. He did not observe Koch committing a crime with his car, he testified. The act of entering the school to secure the door was lawful; the plantiff even insisted that Koch was not charged with trespassing. The officer did not have his light bar active.

Officer Roberts made it clear in his unsworn statement in the complaint (unsworn, because it was not precise, as much as it purports to be an affidavit – the trial judge even referred to it as allegation, not evidence, at the motion to quash hearing), Officer Roberts made it clear that he felt it was unlawful for Koch to not exit his car upon the officer's first knock. If an officer knocks on the door of your house, and you do not answer immediately, is it crime?

Nevermind the living quarters are not a permanent structure with utilities. The officer did not activate his light bar. The person-subject is expected to know the law; therefore, he can be expected to know that he is not breaking the law. He is expected to know that a warrant is required to arrest a person who is not presently breaking the law.

The reason given for the physical force exerted at Officer Robert's hand is that an investigation was underway, and Mr. Koch was thwarting it. To investigate on a feeling of a grudge that a citizen-person found an open door on the premises that one is supposed to be insuring perfect safety for—it is not a warrant. *It is a general*

warrant. General warrants are patently unconstitutional. "[D]anger present[s] when one branch 'directly and completely' performs the functions of a separate branch [and] also . . . when one branch 'posses[es], directly or indirectly, an overruling influence over the others in the administration of their respective powers.'" *State v. Thompson,* 954 N. W. 2d 402, 421 (Iowa 2021; McDermott, Christensen, Appel, J., C.J., & J., dissenting; quoting *The Federalist No. 48,* James Madison).

Because the law is hopelessly vague, the balance in the deliberation of the most enlightened jury (and this did, we learn, occur under the watchful eye of a seasoned rural Iowa jury), the balance tips to the defendant, even were there no recording.

Only one witness claims that Koch pushed the deputy. It is not only uncorroborated, but contested.

To send a jury to convict anyone of what is not a crime is not only against justice, but is an incredible disservice to the jury, whose knowledge of the text of the law is supposed to deter crime and bring peace between citizen and sheriff.

You have been told all your life, perhaps, that you never, ever, "resist arrest." How do you know it is arrest, when you have just been subjected to a round of false accusations? How do you know it is arrest, when there is no warrant? How do you know it is arrest, when you are observing the law? The officer observed that his arrest was announced after the person-subject was already subdued (injuries yet undetermined).

Civilly "not resisting arrest" did not work for Mr. Floyd. How could it work for his survivors?

To broach this subject is essential. It is so essential because "interfering" includes "resisting an order." That the power differential is capable of abuse, between *the operator of a valuable automobile* and *an armed and dangerous-in-the-face-of-crime man*, is clear.

The stories taught in the courtroom have begun to favor the armed man. You *must do* anything he says, we are told, unless—no, there's no *unless*. There's only *maybe you get your house back*. *See* (as one might find when searching for an order closing the supreme court building), *Baker v. City of McKinney*, 604 U. S. _ (2024; Justices Sotomayor & Gorsuch, dissenting), for instance.

In the story of *Baker*, the now-just-beserk man in the attic offered no evidence of threat than to himself. What made it necessary to blow up the house? It does not seem from the story that he was under a guardianship, and the plaintiff adequately investigated him before hiring him—so the plaintiff bore responsibility if he acted unpredictably. Wasn't there enough time to rally the fire department, just in case?

This perspective seeps into similar stories. Breonna Taylor was a person the Government rendered lifeless. In siding with the Government, the federal District Court observed that the Government's agents came bursting through the door like bandits. Despite the lunacy of this behavior, it seems that the Government has secured the license to burst in like bandits. You could say it is an official act.

Take the case of Amir Locke, for instance. He was sleeping on the couch in the living room. Officers burst in like bandits, and Locke responded appropriately by retrieving a handgun. He was killed. The Government was certain that whether he

was resisting the apparent bandits had actual relevance. This conclusion is from the case 0:23-cv-00273-ECT-DLM and the July 8, 2024 Order page 8. It says, as if it is relevant, "[I]t remains plausible that Amir was attempting to comply with officers' directions to drop the handgun and surrender before he was shot." At page 9: You can be killed for escaping. It cites back to *Kisela v. Hughes,* 584 U. S. 100, 103 (2018). Here, evidence of "probable cause to believe that the [subject] poses a threat of physical harm, . . . [means you can kill him if you can get him to try to escape]." Not, "seen in the act of deadly behavior," but, "a threat of physical harm." Do you include a licensed automobile driver in that definition?

Even *Kisela* at 105 observes that the target inside a secure fence could be killed because she did not drop the knife as ordered. Never mind that she was inside a secure fence—the damsel in distress was also inside the secure fence—and the damsel in distress was not moving away. 584 U. S. 101, 108, 110. Just for *refusing the command,* you can be deadly forced—and, the stories teach, it could be legal. See 106, for example: refusing commands to drop a sword got a man shot.

The story of the *Amir* case continues to teach this point. At 11: "Amir was attempting to comply with officers' commands." At 12: "Amir . . . was attempting to comply with officers' commands." Also, "compliance with . . . commands" (citing *Partridge v. City of Benton,* 929 F. 3d 562, 567 (8th Cir. 2019). Then the District Court plays the truth card on page 13, when retreating to the tenet that a "warning" sometimes "is not feasible." So, a command is not necessary, you don't get a warning, but if you break it anyway, you're dead.

Resisting arrest was used to justify the dangerous attack on Jaleel Stallings, during the 2020 Minneapolis riots, according to multiple reports. Mr. Stallings was lawfully assembled with a firearm.

Another example is the police behavior while encountering a speeding motorist. G. Ramsay and others write for CNN on September 10, 2024, "What we know about the police detention of Miami Dolphins star Tyreek Hill," relating that police demand the motorist obey instantly. "When we tell you to do something, you do it. You understand? You understand? Not what you want, but what we tell you."

The effect of the idea that "you must do what I say, or it is a crime," is seen in the death of Sonya Massey. The police appear in the house. The men concur with turning down a boiling pan of water. The act is then taken as a threat. A rebuke in the name of Jesus adds insult to injury. She is murdered.

Going back to 2020, J. Bote reports for USA Today on June 2, 2020, " 'Light 'em up': Minneapolis officers seen firing paint rounds at people on their porch." The Government (in this case, the Minneapolis Department of Public Safety), actually responded in writing that, "If a law enforcement officer or other public safety official asks you to go inside, or take any other action, you must follow the instruction." That's tyranny.

Justice Stevens pens a rousing dissent in *Arizona v. Evans,* 514 U. S. 1 (1995) at 18: "The [Fourth] Amendment protects the fundamental 'right of the people to be secure in their persons, houses, papers, and effects,' against *all* official searches and

seizures that are unreasonable. The Amendment is a constraint on the power of the sovereign, not merely on some of its agents."

In a quote that bears on the opening accusation in the present case, Justice Stevens continues at 23:

> The offense to the dignity of the citizen who is arrested, handcuffed, and searched on a public street simply because some bureaucrat has failed to maintain an accurate computer data base strikes me as equally outrageous.

He had just quoted from James Otis, and from Justice O'Connor in *Illinois v. Krull,* 480 U. S. 340, 363 (1987, J. O'Connor dissenting). Justice Ginsburg repeated his position in *Herring v. U. S.*, 555 U. S. 135 (2009) at 155 (dissenting).

James Otis is well known to have inspired John Adams, in Otis's arguments against general warrants before the American Revolution. *See* D. McCullough, *John Adams* at 62 (Simon & Schuster: 2001; "James Otis, his hero").

The effect of this unconstitutional statute can be seen clearly at work. The officer demanded that Koch confess some sort of guilt. Koch refused the demand. Koch therefore tested the officer's order. There was no guilt to confess, but that's beside the point. Quickened with the intent to secure a confession, the officer used force to prevent the suspect from escape. Yet the officer had no reason to make the arrest. Koch knew this. No constitution will license a person to lie—neither as citizen nor as agent. The Court must recognize that the subject (who knows the law) will require a reason to submit to arrest. A set of blue flashing lights presents that evidence—a false charge does not.

Now let's be practical. All the exclusionary rule-making does not help. The jury has ruled. The exclusionary rule actually insulates local officers from local accountability, but no matter. There was no reason to believe the officer was engaged in lawful behavior.

There was no reason to believe that Officer Roberts engaged in a lawful act, because the search was unreasonable. The subject was a citizen on public property, but that does not invalidate the constitutional obligations. *See New Jersey v. T.L.O.*, 469 U. S. 325 (1985). Plaintiff Iowa's prosecutor emphasized to the jury that Defendant Koch was not charged with trespass. This admits no reason to suggest that the deeded custodian of public property, a school, changes the constitution.

It is nationally important to keep in mind that the citizen is innocent until proven guilty of a constitutional offense. General searches and tyrannical commandeering of motorists do not qualify.

Sometimes we ask too much of police. Most motorists can testify to the aggressive behavior of a truck driver just behind a car in the fast lane; and, in contrast, the respectful behavior of many other truckers. Not as many people have experienced the difference between the aggressive behavior of a young police officer on middle school grounds; and, in contrast, the civil professionalism of an officer conducting public safety on truck stop grounds.

3. Prompt Jury Trials

The speed of the court system is related to how effective punishment is. Nowhere does petitioner debate whether the evidence supports the verdict. Mr. Koch takes the

position that the jury has answered a question or two. However, answering a question, such as, "Is Defendant guilty of believing there is a face on the moon?" – well, it is not a question that will send him to jail.

The tack of limiting post-jury review to questions of constitutional statutes is one calculated to clear the work of appellate courts. It is calculated to promote the gravity of the jury proceedings. Defendants get one chance at the jury—that is the premise. After all, if you know the law as you are expected to, it will be a simple matter to explain to the jury the reason that you are innocent. If you don't know the law, you are in class. Better start to study! If you despise the law, you still don't get multiple chances at a jury. The record in this case shows that the trial court attempted the void entry of prohibiting arguments in favor of jury nullification—everyone knows that Iowans can think. Yet giving the defendant one chance at the jury accomplishes the national objective of discouraging litigation, accelerating justice, and promoting civil society. If the criminal is set at liberty because the constable erred, the law is not enforced. The target is demotivated to reconcile the error with the constable, and the constable discouraged from the wholesome enforcement of our laws. To send a jury to convict anyone of what is not a crime is not only against justice, but is an incredible disservice to the jury, whose knowledge of the law is helpful to deter crime and promote peace between mankind.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Isaac Koch

Isaac Koch, petitioner

Date: 11-27-24