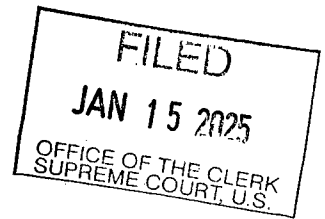


24 - 6689
No. _____



IN THE
SUPREME COURT OF THE UNITED STATES

Tarun Kumar Vyas — PETITIONER
(Your Name)

vs.

Chadwick Dotson — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

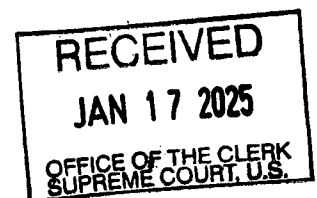
Supreme Court of Virginia
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Tarun Kumar Vyas #2038877,
(Your Name)
VADOC Centralized Mail Distribution Center,
3521 Woods Way,
(Address)

State Farm, VA — 23160.
(City, State, Zip Code)

(Phone Number)



QUESTION (5) PRESENTED

① Do the Ist, IVth, Vth, VIIIth and XIVth amendments allow the state to dismiss the petition for a writ of habeas corpus for exceeding 50 pages?

They should not, especially when the petitioner is factually, actually and legally innocent, and there are many proven instances of bad faith on the part of the state.

LIST OF PARTIES

☒ All parties appear in the caption of the case on the cover page.

☐ All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

① The following at the U.S. Court of Appeals for the Fourth Circuit :-

(a) 24 - 6866

(b) 23 - 6625

② The following at the U.S. district court for the Western District of Virginia :-

(a) 7823 - CV - 00570 - EKD - JCH

(b) 7823 - CV - 00102 - JPT - PMS

(c) 7823 - CV - 00216 - EKD - JCH

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

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

OPINIONS BELOW

☐ For cases from **federal courts**:

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

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

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

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

☒ For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix C to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

The opinion of the highest state court for rehearing appears at Appendix D to the petition and is

- ☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☒ is unpublished.

JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

☐ No petition for rehearing was timely filed in my case.

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

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

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

☒ For cases from **state courts**:

The date on which the highest state court decided my case was 11/8/2024.
A copy of that decision appears at Appendix C.

☒ A timely petition for rehearing was thereafter denied on the following date: 12/9/2024, and a copy of the order denying rehearing appears at Appendix D.

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

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

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Dr. Vyas respectfully states that the following constitutional and statutory provisions are involved :-

- ① The Ist amendment's freedom of speech clause,
- ② The Ist amendment's vagueness doctrine,
- ③ The Ist amendment's overbreadth provision,
- ④ The IVth amendment's unreasonable search and seizure clause,
- ⑤ The IVth amendment's legitimate expectation of privacy provision,

- ⑥ The IVth amendments' warrant being overbroad, general, lacking particularity and being issued without probable cause clauses,
- ⑦ The Vth amendments' due process clause,
- ⑧ The Vth amendments' double jeopardy clause,
- ⑨ The Vth amendments' self incrimination clause,
- ⑩ The Vth amendments' grand jury clause,
- ⑪ The VIth amendments' speedy and public trial clause,
- ⑫ The VIth amendments' impartial jury clause,
- ⑬ The VIth amendments' confrontation clause,

- (14) The VIth amendment's assistance of counsel clause,
- (15) The VIIIth amendment's cruel and unusual punishment clause,
- (16) The XIVth amendment's due process clause,
- (17) The XIVth amendment's enforcement clause,
- (18) The XIVth amendment's privileges and immunities clause,
- (19) The Xth amendment and
- (20) Supreme Court of the United States Rule 49(b).

'STATEMENT OF THE CASE'

Dr. Vyas respectfully states the following :-

- ① I filed the state habeas corpus petition (record no. 230028) on 1/10/2023 due to both constitutional and statutory speedy trial violations.
- ② The state moved to dismiss by arguing that I did not claim ineffective assistance of trial counsel.
- ③ I timely replied stating that their argument is moot under 'Green VS Commonwealth, 40 Va. (1 Rob.) 731 (1842)' and 'Martinez VS Ryan, 566 U.S. 1 (2012)'.
VS Ryan, 566 U.S. 1 (2012).
- ④ The petition then remained pending until after the jury trial, hence I started supplementing the record with claims that became cognizable only after the jury trial.

- (5) The state moved to dismiss due to me using the wrong page size, exceeding the page no. limit, apart from other frivolous arguments. I opposed them all in a timely manner.
- (6) In May 2024, the supreme court of Virginia (S.C.O.V.A.) ordered me to refill the petition in 50 pages. I filed two motions to grant relief from that order arguing inter alia:—
- (a) that I am simply unable to do so in such a short amount of time, as the jail staff members failed to provide me any copies when I mailed the petition.
 - (b) I do not have the money to order copies from the court.
 - (c) My incarcerated status poses additional challenges due to the nature of my charges.

⑥

①

Ordering me to reject the petition in this manner will unconstitutionally and impermissibly allow the state to get a second bite at the apple, since it has already affirmatively waived its right to argue on the merits of all the claims, by moving to dismiss on alleged procedural default viz., paper size, page nos. etc. And in doing so, they have conceded that all the claims have merit.

⑦

However, the SCOVA denied both the motions and finally dismissed the petition on November 8, 2024.

⑧

This was despite the fact that the state has been prosecuting citizens intentionally, maliciously and recklessly on the basis of a statute that violates the 1st, 5th and 14th amendments, both

- ⑧ facially and as - applied , for almost two decades.
- ⑨ The petition also put forth claims that are of first impression for the state within the realm of child pornography , viz., barebones affidavits , unconstitutional warrants , unconstitutional statute , unconstitutional sentence , lack of a digital forensic expert and more.
- ⑩ The petition even put forth claims that although not of first impression for the state , are still meritorious , cognizable and colorful , viz., 'miranda' violations , 'edwards' violations , involuntary statements , 'crawford' violations (confrontation clause) and many more.
- ⑪ The petition also put forth a few structural errors such as public trial , vindictive prosecution and more.

(12) The fact which makes the petition unique, extraordinary and compelling, is that all the habeas claims have been ruled in a manner that warrants a result favorable to me, by this court, federal circuits and/or federal district courts, in accordance with the U.S. constitution.

Therefore, my incarceration is highly oppressive as I am factually, actually and legally innocent. It is harder to find a greater fundamental miscarriage of justice.

(13) Therefore, the fact that the state dismissed my petition for exceeding 50 pages, violates many clauses and provisions of the Ist, IVth, Vth, VIth, VIIIth and XIVth amendment rights — please see 'constitutional and statutory provisions involved.'

REASONS FOR GRANTING THE PETITION

Dr. Vyas respectfully states the following :-

- ① A state court of last resort has decided an important question of federal law that has not been, but should be settled by this court.
- ② A state court of last resort has decided an important federal question in a way that conflicts with the relevant decisions of this court.
- ③ A state court of last resort has decided an important federal question in a way that conflicts with the decision of a U.S. court of appeals.
- ④ The question is important and recurring.

- ⑤ The lower court has overstepped its authority.
- ⑥ A nationwide answer to the federal issue is necessary.
- ⑦ The lower courts' ruling has produced a genuine, direct and outcome determinative conflict, with more than one clearly established federal laws by this court.
- ⑧ The issue is extremely important over which this court and all the federal circuits, are openly and intractably divided with the supreme court of Virginia.
- ⑨ The lower courts' ruling violates my IVth, Vth, VIth, Ist, VIIIth and XIVth amendment rights.

Dr. Vyas respectfully states the following in support thereof :-

- ① The state courts' ruling is contrary to the clearly established federal laws by this court in 'Hilton VS Branskill, 487 U.S. 770 (1987)' and 'Nken VS Holder, 556 U.S. 418 (2009)', since I satisfy all the factors in order to be granted admission to reasonable post-conviction bail. Granting the petition will, therefore, address the absence of a similar remedy therein.
- ② Keeping me incarcerated tantamounts to a fundamental miscarriage of justice and oppressive incarceration, because I am legally, actually and factually innocent.
- ③ I will be unable to include all the claims in 50 pages. That would then violate 28 U.S.C. § 2254 (e) (2), since a petition must specify all the grounds for relief, as well

- (3) as all the facts supporting each ground [Rule 2(c)].
- (4) The state remedies should be considered exhausted, as I have fairly presented all the claims and the underlying facts in 230028.
- (5) The state failed to liberally construe my petition under 'Woy VS McDonnell (1974)', 'Haines VS Kerner (1972)', 'Estelle VS Gamble (1976)', 'Boag VS Dougall (1982)' and 'Erickson VS Pardus (2007)'.
- (6) There should be no AEDPA deference afforded to any of the claims under 28 U.S.C. 2254 (d)(2) [Panetti VS Quarterman, 551 U.S. 953 (2007)], in this situation.
- (7) There are many instances of malicious, intentional and reckless bad faith on the part of the state, right from the arrest. They include violations of:

⑦ Brady VS Maryland, 373 U.S. 83 (1963),
 Wooden VS USA, 595 U.S. 360, 366 - 76 (2022),
 Giglio VS USA, 405 U.S. 150 (1972),
 Smith VS Cain, 565 U.S. 73 (2012),
 USA VS Bagley, 473 U.S. 667 (1985),
 Franks VS Delaware, 438 U.S. 154 (1978),
 The Jencks Act,
 18 U.S.C. § 3500,
 Fed. R. Crim. P. 16's Virginia equivalent,
 USA VS Leon, 468 U.S. 897 (1984),
 Rehaif VS USA, 588 U.S. 225 (2019),
 All the constitutional and statutory provisions stated (Page nos. 5 - 7).
 [≈ Please see the submissions on the accompanying thumb drive for proof.]

⑧ The total sentence imposed is also in violation of clearly established federal law by this court as well as the IVth, Vth, VIIIth and XIVth amendments. (Please see the next point for all the details so as to why.)

⑨ The 2020 Va. Code Ann. § 18.2 - 374.1:1 states the following :-

"Subsection A : Any person who knowingly possesses child pornography (C.P.) is guilty of a Class 6 felony.

Subsection B : Any person who commits a second or subsequent violation of subsection A is guilty of a Class 5 felony.

Subsection C : Any person who knowingly ① reproduces by any means, including by computer, sells, gives away ... by not less than 5 years nor more than 20 years in a state correctional facility. Any person who commits a second or subsequent violation under this subsection shall be punished by a term of imprisonment of not less than 5 years nor more than 20 years in a state correctional facility, 5 years of which shall be a mandatory

minimum term of imprisonment. The mandatory minimum terms of imprisonment prescribed for violations of this section shall be served consecutively with any other sentence."

Then, the 2020 Va. Code Ann. § 18.2 - 374.1 (A) states :-

"For the purposes of this article and Article 4 (§ 18.2 - 362 et seq.) of this chapter, "child pornography" means sexually explicit visual material which utilizes or has a subject an identifiable minor. An ...

For the purposes of this article and Article 4 (§ 18.2 - 362 et seq.) of this chapter, the term "sexually explicit visual material" means a picture, photograph, drawing, sculpture, motion picture film, digital image, including such material stored in a computer's temporary Internet

cache when three or more images or streaming videos are present, or similar visual ... or a book, magazine or pamphlet which contains such a visual representation. An ..."

Therefore, the statute, indictments and sentence violate the Ist, IVth, Vth, VIIth and Xth amendments both facially and as - applied, due to the following :-

- ① The words "three or more" in the definition of sexually explicit visual material (S.E.V.P.).
- ② The disjunctive structure of SEVP commanding the result that there are nine (9) different ways to violate the statute. Therefore,

(ii)

only one distribution and one possession charge is permissible.

(iii)

The statute combines both the medium and matter in the same sentence, thereby commanding the result that only one count of distribution and only one count of possession are permissible on the basis of the social media accounts allegedly used to commit the distribution and possession crimes; viz., Kik and Dropbox respectively, in accordance with the rule of identity.

(iv)

The lack of any prosecutorial discretion in the state, as the number of distribution and/or possession charges can vary from one or two, to hundreds, based upon the same identical facts.

(v)

The word "shall" being ambiguous, thereby commanding the result that all the sentences imposed

[* $\Rightarrow$ transaction, conduct and]

(v) for the distribution charges should be run concurrent to one another, and possession as well.

(vi) The alleged distribution across three days being a singular * act, in addition to the medium remaining the same; also warranting that only one distribution count should be permissible.

(vii) The rule of lenity should also be extended to the total active sentence imposed, in addition to the interpretation of the penal statute.

(viii) The fact that in accordance with the legislature, more heinous crimes receive a lesser sentence, also commands the result that the legislature intended for only one distribution and possession counts to be permissible.

(ix) The fact that "cached files" have

(ix) been deemed insufficient to prove knowing possession by the VA court of appeals, also warrants that the statute is unconstitutional. This result should also extend to knowing distribution because the same statute is applicable there.

(x) The states' interpretation of the legislative intent being both incorrect and impermissible as :

(a) The statute is both penal and ambiguous, hence legislative intent is inapplicable and

(b) This court has already ruled that legislative intent is not the law.

(xi) The word "section" instead of "subsection" in the VA. Code. Ann. § 18.2-374.1:1 (C), also warranting that the sentences should have run concurrently to one another, for all

- (xi) The distribution charges.
- (xii) The distribution indictments being duplicitous.
- (xiii) The in pari materia cannon of statutory construction warranting the same results as previously stated.

Hence, the following results should be reached :

- ① Only 1 distribution and 1 possession counts should be permissible.
- ② The maximum effective active prison should be five years.
- ③ All the charges, convictions and sentences should be dismissed with prejudice owing to not only the aforementioned, but also due to the malicious, intentional and reckless bad faith on the part of the state, for having prosecuted so many citizens for

③ nearly two decades based upon clearly erroneous and unconstitutional interpretations. See Mason VS Commonwealth, 49 Va. App. 39 (2006).

In addition to all the legal and factual arguments and the authorities submitted on the thumb drive submitted along with, I respectfully state the following in support thereof :-

It requires that a penal statute define the criminal offense with sufficient definiteness that ordinary people can understand what conduct is prohibited and in a manner that does not encourage arbitrary and discriminatory enforcement [Kolender

VS *Lanston*, 461 U.S. 352, 357 (1983)].

Secondly, as a sort of a junior version of the vagueness doctrine, the canon of strict construction of criminal statutes, or the rule of lenity, ensures fair warning by so resolving ambiguity in a criminal statute so as to apply it only to conduct clearly covered. Thirdly, although clarity at the requisite level may be supplied by judicial gloss on an otherwise uncertain statute, due process bars courts from applying a novel construction of a criminal statute to conduct that neither the statute nor any prior judicial decision has fairly disclosed to be within its scope [*USA VS Lanier*, 520 U.S. 259, 266 (1997)]. It is a fundamental tenet of due process that no one may be required at peril of life, liberty or property to speculate so as to the meaning of penal statutes [*USA VS Batchelder*, 442 U.S. 114, 123 (1979)] [*Lanzetta VS New Jersey*, 306 U.S.

451, 453 (1939)].

The double jeopardy (D.J.) clause provides that no person shall be subject for the same offense to be put twice in jeopardy. This guarantee provides protection against both multiple prosecutions and multiple punishments for the same offense [Whalen VS USA, 445 U.S. 684, 688 (1980)].

Therefore, the following prove and affirm the contentions :-

- ① Sanabria VS USA, 437 U.S. 54, 70 (1978)
- ② USA VS Rigas, 605 F.3d 194, 208 (3rd circuit, 2010)

- ③ USA VS Chilaca, 909 F.3d 295 (9th circuit, 2018)
- ④ Rutledge VS USA, 517 U.S. 292, 302 (1996)
- ⑤ USA VS Universal C.I.T. Credit Corp., 344 U.S. 218, 221 (1952)
- ⑥ The Confiscation Cases, 20 Wall. 92, 104, 22 L. Ed 320 (1874)
- ⑦ Ladner VS USA, 385 U.S. 169 (1958)
- ⑧ Bell VS USA, 349 U.S. at 83 (1955)
- ⑨ USA VS Fall, 955 F.3d 363, 373 (4th circuit, 2020)
- ⑩ USA VS Elliot, 937 F.3d 1310 (10th circuit, 2019)
- ⑪ USA VS Planck, 493 F.3d 501 (5th circuit, 2007)
- ⑫ Reynolds VS USA, 565 U.S. 432 (2012) ⇒ "shall" commands a discretionary action, not a mandatory one
- ⑬ Deal VS USA, 508 U.S. 129, 132 (1993)
- ⑭ Ball VS USA, 470 U.S. 856 (1985)
- ⑮ USA VS Davenport, 519 F.3d 940, 947 (9th circuit, 2008)

- (xvi) USA VS Miller, 527 F.3d 54, 72 (3rd circuit, 2008)
- (xvii) USA VS Eche, 640 F.3d 689, 695 (6th circuit, 2011)
- (xviii) Reiter VS Sonstere Corp., 442 U.S. 330, 339 (1979)
- (xix) Montana VS Egelhoff, 518 U.S. 37, 41 - 51 (1996)
- (xx) USA VS Schales, 546 F.3d 965, 979 (9th circuit, 2008)
- (xxi) USA VS Faulkner, 730 Fed. Appx. 325, 329 (6th circuit, 2018)
- (xxii) Blockburger VS USA, 284 U.S. 299 (1932)
- (xxiii) Wooden VS USA, 595 U.S. 360 (2022)
- (xxiv) Albernaz VS USA, 450 U.S. 339, 344 n.3 (1981)
- (xxv) USA VS Naidoo, 995 F.3d 367, 381 (5th circuit, 2021)
- (xxvi) Bostock VS Clayton County, 140 S.Ct. 1731 (2020)
- (xxvii) Epic Sys. Corp. VS Lewis, 129 S.Ct. 1058 (2018)
- (xxviii) USA VS Austin, 529 F.2d 559 (6th circuit, 1976)

(10) The following prove that both the 2/17/21 affidavits (provided on the thumb drive mailed along with), transgressed both 'Leon' and 'Frank', and as such cannot be saved from either a 'Leon' or a 'Frank' death :-

(i) The affidavits failed to establish a nexus between the crime and [redacted] myself.

(ii) The affidavits failed to establish a nexus between the crime and the illegally seized devices.

(iii) The affidavits failed to establish any probable cause or reasonable suspicion.

(iv) The affidavits failed to mention :

(a) That I never identified the devices as mine,

(b) That I refused ever having Kik,

(c) Anything about the reliability and credibility of Kik, [redacted]

- (iv) (d) That no Wifi network was ever tested,
- (e) So as to why I would be someone interested in child pornography (C.P.),
- (f) Any statement such as 'me being someone who would prize the CP collection and keep it for years, rarely ever disposing of the cherished material. And also that CP is securely kept on various digital devices secretly in the confines of homes',
- (g) That I did not have a history of any sex crimes,
- (h) That none of the minors portrayed in the files had been confirmed as being 'real' via the Child Victim Identification Program,
- (i) Any details that could reasonably satisfy the definition of sexually explicit visual material under VA Code § 18.2 — 374.1,
- (j) That my statements were obtained in violation of Miranda and/or Edwards,
- (k) That my statements were involuntary.

- (v) The affidavits failed to include any image or even a thumbnail of a video.
 - (vi) The affidavits failed to include any reasonably detailed explanation of a file which could establish either probable cause or reasonable suspicion.
 - (vii) The affidavits included statements that should be suppressed under Miranda, Edwards or due to being involuntary.
 - (viii) The affidavits do not even fill half a page and consist of only three original statements by the affiant, which were specific to the events that transpired on 2/16/21. Furthermore, even those statements were false.
 - (ix) The affidavits contain the following false statements:
 - (a) "A Samsung mobile phone and chromebook was in plain view at his work location and was seized as evidence."
- The video and audio files submitted

- ix) (a) on the thumb drive prove that the devices were not in plain view. The affiant also did not have any consent to seize the devices.
- (b) "The object, thing or person searched for constitutes evidence of the commission of such offense."
- (c) "Tarun Kumar Vyas (10/15/1985) was located in the Virginia DMV database with ties to the Harrisonburg area." This statement is also patently false because the affiant checked the driver licence at the local jail only after the unconstitutional arrest and seizure.

[USA VS Leon, 468 U.S. 897, 923 (1984)]

[USA VS Sheehan, 70 F.4th 36, 52 (1st circuit, 2023)]

[USA VS Waide, 60 F.4th 327, 342 (6th circuit, 2023)]

[USA VS Griffith, 867 F.3d 1265, 1278 (D.C. Circuit, 2017)]

[Franks VS Delaware, 438 U.S. 154 (1978)]

[USA VS Taylor, 63 F.4th 637, 656 - 57 (7th circuit, 2023)]

- ⑪ Then, both the warrants issued on 2/17/21 failed the warrant clause of the IVth amendment because :-
- ① They failed to include the known temporal limitation i.e. 10/5/20 - 10/9/20, in a malicious, intentional and reckless fashion.
 - ② They authorized the search and seizure of any and all data, maliciously, intentionally and recklessly. (Copies are provided on the thumb drive mailed along with.)

[USA vs Leon, 468 U.S. 897, 923 (1984)] [USA vs Cordero - Rosario, 786 F.3d 64, 72-73 (1st circuit, 2015)] [USA vs Lyles, 910 F.3d 787, 796-97 (4th circuit, 2018)] [Scott vs USA, 436 U.S. 128, 137-38 (1978)] [USA vs Loera, 923 F.3d 907, 924 (10th circuit, 2019)] [USA vs Lannia, 70 F.4th 106, 126 (2nd circuit, 2023)] [USA vs Suggs, 998 F.3d 1125, 1132-35 (10th circuit, 2021)] [USA vs Lazar, 604 F.3d 230, 238 (6th circuit, 2010)] [In re 650 Fifth Ave., 830 F.3d 66, 100-01 (2nd circuit, 2016)] [Sgro vs USA, 287 U.S. 206, 215 (1932)]

(12) The case also consists of the following non-harmless confrontation clause and inadmissible hearsay violations:-

(i) Absence of the person who allegedly saw the entire content of all the files before forming the Kik cyber tip.

(ii) Absence of the human authors of the Kik repository containing the hash values of confirmed C.P., the Comcast report, the AT&T report, the Google report and Section C of the NCM&C cyber tip.

[Melendez VS Massachusetts, 557 U.S. at 321 (2009)] [Bullcoming VS New Mexico, 564 U.S. at 659, n.6 (2011)] [Crawford VS Washington, 541 U.S. 36 (2004)] [USA VS Cameron, 699 F.3d 621 (1st circuit, 2012)] [Davis VS Washington, 547 U.S. 813, 822 (2006)]

(13) Three identical files were employed by the state to achieve both distribution and possession charges. That also violated ^{my} double jeopardy clause under the 5th amendment [USA VS Ewe, 640 F.3d at 695, 698 (6th circuit, 2011)].

CONCLUSION

Thus, I pray that the court grant the petition for a writ of certiorari.

Respectfully submitted,

~~Tarun~~

Tarun Kumar Vyas # 2038877
3521 Woods Way
State Farm
VA — 23160

[Date : January 15th 2025]