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United States, One First Street, NE
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24-6754 **ORIGINAL**
No. _____

IN THE
SUPREME COURT OF THE UNITED STATES
OCTOBER TERM 2024

FILED
FEB 11 2025
OFFICE OF THE CLERK
SUPREME COURT, U.S.

Ryan C. Edner
Petitioner,

v.

State of Minnesota, et al.
Respondents

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

The Petitioner respectfully prays that a writ of certiorari issue to review the judgment of the Eighth Circuit Court of Appeals in Case No. 24-2639.

QUESTION PRESENTED

Whether the Fourteenth Amendment's Due Process Clause requires immediate federal judicial intervention—despite *Younger* abstention—when state proceedings are predicated on demonstrably fraudulent evidence and prosecutorial misconduct, thereby depriving an accused individual of any meaningful remedy or fair adjudication.

Ryan Christopher Edner

416 4th Ave N
Wahpeton, ND, 58075

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LIST OF ALL PARTIES TO THE PROCEEDINGS

Petitioner

- **Ryan Christopher Edner:** A pro se litigant challenging his nearly decade-long criminal prosecution beginning on September 8th, 2015 (Case No. 64-CR-15-649) in which all charges were dismissed on August 30th, 2024 after revelations that no valid chemical analysis ever supported the charges.

Respondent

- **State of Minnesota, by and through Keith Ellison, Minnesota Attorney General:** The prosecuting authority in the underlying criminal case, responsible for defending the judgment from which Petitioner seeks certiorari review.

Service Address:

Attorney General **Keith Ellison**
Minnesota Attorney General Office
445 Minnesota Street, Suite 1400
St. Paul, MN 55101-2131

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TABLE OF AUTHORITIES

Cases

- **Arizona v. Youngblood**, 488 U.S. 51 (1988)
- **Blackledge v. Perry**, 417 U.S. 21 (1974)
- **Brady v. Maryland**, 373 U.S. 83 (1963)
- **California v. Trombetta**, 467 U.S. 479 (1984)
- **Caperton v. A.T. Massey Coal Co., Inc.**, 556 U.S. 868 (2009)
- **Giglio v. United States**, 405 U.S. 150 (1972)
- **Haines v. Kerner**, 404 U.S. 519 (1972)
- **Hazel-Atlas Glass Co. v. Hartford-Empire Co.**, 322 U.S. 238 (1944)
- **Mapp v. Ohio**, 367 U.S. 643 (1961)
- **Mooney v. Holohan**, 294 U.S. 103 (1935)
- **Napue v. Illinois**, 360 U.S. 264 (1959)
- **Strickland v. Washington**, 466 U.S. 668 (1984)
- **Timbs v. Indiana**, 586 U.S. ____ (2019)
- **Younger v. Harris**, 401 U.S. 37 (1971)

Statutes & Rules

- **28 U.S.C. § 1254(1)**
- **Eighth Circuit Local Rule 40A(c)**

- **Eighth Circuit Rule 47A(a)**
- **Federal Rule of Civil Procedure 60(b)(3)**

(Additional authorities and unpublished decisions referenced in the lower courts are omitted for brevity.)

OPINIONS BELOW

1. **Eighth Circuit Court of Appeals** (Case No. 24-2639): Unpublished decision.
2. **U.S. District Court for the District of Minnesota** (Case No. 0:24-cv-02299-JWB): Unpublished order dismissing Petitioner's civil claims.
3. **Redwood County District Court** (Case No. 64-CR-15-649): Underlying criminal prosecution dismissed in August 30th, 2024.

JURISDICTION

- The Eighth Circuit entered its final order on December 6, 2024 with direction to this Court (*see App 'x A.1.2.*).
- Jurisdiction is proper under **28 U.S.C. § 1254(1)** (*see App 'x E*).
- This petition is timely filed within 90 days of the judgment, pursuant to **Supreme Court Rule 13** (*see App 'x E*) *and prior to March 6, 2025.*

CONSTITUTIONAL/STATUTORY PROVISIONS INVOLVED

1. Fourteenth Amendment (Due Process Clause)

U.S. Const. amend. XIV, § 1 (Relevant Excerpt)

“...nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.”

Why Included: Our petition repeatedly invokes **due process** violations in the prosecution’s reliance on fraudulent evidence and the courts’ refusal to address it. Our Fourteenth Amendment due process claim asserts that the State’s reliance on falsified or nonexistent evidence fundamentally corrupted the criminal proceedings. Because neither state nor lower federal courts have meaningfully addressed or remedied this deceit, the petitioner contends a clear due process violation continues to infect the petitioner’s case, necessitating Supreme Court review and relief.

2. 28 U.S.C. § 1254(1)

(Relevant Text)

“Cases in the courts of appeals may be reviewed by the Supreme Court by the following methods:

(1) By writ of certiorari granted upon the petition of any party to any civil or criminal case, before or after rendition of judgment or decree...”

Why Included: This statute establishes the Supreme Court’s **jurisdiction** to review decisions from the U.S. Courts of Appeals, including our Eighth Circuit appeal.

3. Supreme Court Rule 13

(Relevant Excerpt)

Rule 13.1: “...a petition for a writ of certiorari to review a judgment in any case, civil or criminal, entered by a state court of last resort or a United States court of appeals is timely when it is filed with the Clerk of this Court within 90 days after entry of the judgment...”

Rule 13.3 (portion): “The time to file ... runs from the date of entry of the judgment or order sought to be reviewed.”

Why Included: Our petition is filed within **90 days** of the Eighth Circuit’s final order, making **Rule 13** dispositive of timeliness dated December 6th, 2024.

4. Federal Rule of Civil Procedure 60(b)(3)

(Relevant Text)

“On motion and just terms, the court may relieve a party or its legal representative from a final judgment, order, or proceeding for the following reasons:

(3) fraud (whether previously called intrinsic or extrinsic), misrepresentation, or misconduct by an opposing party...”

Why Included: Our case argues the State engaged in **fraud or misconduct** by basing the prosecution on a non-existent chemical analysis, implicating FRCP 60(b)(3) and **Hazel-Atlas Glass** for post-judgment relief. **FRCP 60(b)(3)** underscores that **fraud and misrepresentation by the prosecution** vitiate any valid judicial outcome, entitling the petitioner to relief from the judgments or orders built on that false evidence. This aligns with longstanding Supreme Court doctrine that the integrity of the judicial process demands **correction** where one party’s deceptive conduct shaped the litigation.

5. Eighth Circuit Rule 47A(a)

(Relevant Excerpt)

Rule 47A(a): “The court may dispose of an appeal summarily if it clearly appears that no substantial question is presented by the appeal. The court may affirm... without further briefing or argument if it is manifest the questions are so unsubstantial as not to need further argument.”

(Note: The exact language may vary slightly in official publications, but this excerpt captures the essential summary-affirmance authority.)

Why Included: Our petition contends the Eighth Circuit improperly invoked Rule 47A(a) to **summarily affirm** the lower court’s **dismissal** of constitutional claims without substantive review. The misapplication of Rule 47A(a) essentially **foreclosed** our ability to have the factual record examined and the constitutional violations weighed on the merits. In short, it allowed the Eighth Circuit to **sidestep** critical questions about whether prosecutorial fraud had corrupted the entire process.

This outcome left us with no choice but to seek **Supreme Court** review, as the Eighth Circuit’s summary affirmation under Rule 47A(a) meant the petitioner’s claims were never given the **substantial scrutiny** the Constitution requires when allegations of false evidence and state misconduct are involved.

6. Eighth Circuit Local Rule 40A(c)

(Relevant Excerpt)

“No successive petitions for rehearing or rehearing en banc will be filed or entertained. The clerk will accept only one petition for rehearing from any party to an appeal and will not accept a motion to reconsider the denial of a petition for rehearing or rehearing en banc.”

Why Included: The Eighth Circuit misapplied Local Rule 40A(c) by **conflating** a corrective overlength filing with a “successive” petition under Rule 40A(c), the Eighth Circuit **unfairly denied** the one meaningful rehearing opportunity the petitioner had—thus robbing the petitioner of appellate scrutiny on fundamental constitutional issues. This procedural rigidity, the petitioner contends, is incompatible with **pro se** protections, Supreme Court precedent, and the basic mandate to ensure serious constitutional questions receive an adequate hearing

STATEMENT OF THE CASE

I. Origins of the Criminal Prosecution and Alleged Fraud

In September 2015, the State of Minnesota initiated a criminal case against Petitioner (No. 64-CR-15-649), asserting that BCA laboratory tests conducted on May 23rd, 2016 consisting of only a “weight analysis” confirmed THC in plant material.

(See App’x A.3.5, BCA Submissions by the State, App’x C.3.2 Chemical Analysis Request and Correspondence, C.1.3. Registry of Actions.)

Petitioner repeatedly challenged that no valid chemical analysis existed at all—yet, for nearly a decade, courts deferred to the State’s misrepresentations. Indeed, the alleged “chemical test” was the linchpin of the prosecution’s case. *See Brady v. Maryland*, 373 U.S. 83 (1963); *Mooney v. Holohan*, 294 U.S. 103 (1935) (both proscribing prosecutions premised on withheld or false evidence). **Only on August 29th, 2024 did the State concede no legitimate analysis had ever been conducted.**

(see App’x Complaint Dismissal Case No. 64-CR-15-649, Aug. 29, 2024).

Despite years of objections to the State’s purported chemical analysis, every court—from Redwood County to the Eighth Circuit—either deferred to or refused to scrutinize that alleged test. Only when the State finally conceded that no legitimate analysis existed did the prosecution collapse, yet none of the lower courts rectified the record or addressed the profound constitutional violations. Consequently, Petitioner now seeks this Court’s intervention, as no other forum has corrected the fraudulent basis of his decade-long prosecution.

II. Federal Litigation: Conditional Relief and Younger Abstention

On June 14th, 2024, the Petitioner sought federal relief (Case No. 0:24-cv-02299-JWB) prior to the State conceding that no legitimate analysis existed.

(See: App 'x B.1.1. Judge Blackwell's Order Dismissing Case as Frivolous, App 'x B.1.2. Petitioner's Original Complaint, App 'x C1.1. Civil Docket, App 'x A.2.1 Petitioner's Notice of Appeal & Appeal Submission, A.2.2. Motion for Leave to Submit Additional Evidence, A.2.3. Supplemental Filings & Escalation to Eighth Circuit)

Judge John R. Tunheim acknowledged the meritorious basis for damages previously in 2022 as well as from a panel of Judges in connection with a civil claim brought in 2020, but both instances declined to grant injunctive relief, citing *Younger v. Harris*, 401 U.S. 37 (1971).

(See App 'x c.1.4 Past Civil Case Orders & Complaints (2020 & 2022))

This effectively required dismissal of the underlying state criminal case (Case No. 64-CR-15-649) before Petitioner could pursue claims. As a result, the ongoing state proceedings continued unimpeded, allowing what Petitioner characterizes as further deprivation of his due process.

III. Complaint “Dismissal” and Concealment of Longstanding Misrepresentations in Contradiction of Federal Findings

The State’s admission that no valid chemical test had ever existed directly contradicts the district court’s reliance on the State’s false claims of a legitimate analysis—claims Petitioner had contested from the outset.

(App 'x B.1.1 Judge Blackwell Order Dismissal as Frivolous, B.1.2. Petitioner's Original Complaint w/Correspondences AG and Court (May 2, 2024, C.1.4. Past Civil Case Orders & Complaints 2020 & 2022, C.3.2. Law Firm Chemical Analysis Request 2016 & Prosecution's Correspondence BCA 2017)

The dismissal cast doubt on the earlier federal court order and triggered grounds for relief under *Hazel-Atlas Glass Co. v. Hartford-Empire Co.*, 322 U.S. 238 (1944), along with **Federal Rule of Civil Procedure 60(b)(3)** (see App 'x E).

The State's complaint dismissal, far from a benign procedural step, closes the case on a fraudulent note by portraying the demise of charges as a product of legislative shifts or belated testing.

(See App 'x A.3.1, Complaint Dismissal 64-CR-15-649.)

In reality, the State's own admission that no quantifiable THC could be established underscores the original fraud: **no valid chemical analysis ever existed** and the Petitioner's name was never listed on the BCA report. This final act, laden with misleading claims, only reaffirms the need for federal judicial intervention to address the long-standing due process violations and ensure that fabricated evidence cannot simply be "filed away" without consequence.

This dismissal filing ostensibly cites statutory changes and the impracticality of re-testing material seized years earlier—material that the State itself was unable to produce. That material is also officially documented as possibly "destroyed" and "unaccounted" per the **Minnesota State Audit, 2016**. By framing the dismissal as a mere logistical impossibility and never conceding the initial fabrication and misrepresentation of evidence, the State effectively shields itself from accountability for the very misconduct that necessitated dismissal in the first place.

(See App 'x C.3.1. Minnesota State Audit (2016) Non-Compliance)

Revealed BCA Mismatch Confirms Nonexistent Test

Further compounding the State's misleading dismissal of the charges, it was uncovered that the original BCA report—ostensibly central to the prosecution—never listed Petitioner's name at all, instead referencing "Eric Edner." The BCA only retroactively "amended" the report on **September 9, 2024** to mention Ryan Edner. Even this amended report still reflects **no actual chemical analysis**—merely a weight-based test of unverified plant material.

(See App 'x A.3.5 BCA Submissions.)

This revelation provides direct evidence that the State relied on a mismatch of identities and misrepresented the lab results' true subject in seeking both an extradition warrant and a criminal conviction. It also contradicts the State's longstanding portrayal of having a conclusive BCA test linking Ryan to illegal substances, when in fact, no such valid test existed. As with the later "dismissal" filing, the amended BCA report strives to paper over the fundamental fraud at the heart of the prosecution, bolstering Petitioner's claim that neither the District Court nor the Eighth Circuit ever scrutinized the integrity of this purported "analysis."

(See App'x A.3.4, Extradition)

IV. Judicial Bias, Evidence Destruction, and Procedural Obstructions

Petitioner contends that judicial bias, the destruction of crucial evidence, and persistent procedural obstructions collectively undermined his constitutional rights. Multiple defense motions were denied without substantive review; audio recordings and other vital materials—potentially exculpatory—were destroyed, contravening the State's duty to preserve evidence under *California v. Trombetta*, 467 U.S. 479 (1984), and *Arizona v. Youngblood*, 488 U.S. 51 (1988). While this petition cites only a few incidents of systemic misconduct, they exemplify broader constitutional violations extending over nearly a decade as documented through the Petitioner's official Court filings.

(See App'x C.1 for further case records, C.1.3. Registry of Actions, B.1.3. Correspondence with the District Court re: Case Closure.)

Procedural Obstructions & Systemic Collusion

In June 2023, Redwood County adopted a Standing Order ("Paragraph 6") that repeatedly labeled Petitioner's filings "deficient" for nebulous reasons. Although Petitioner attempted to correct these alleged flaws, the motions—detailing prosecutorial misconduct, constitutional breaches and fraud on the Court—never received a merits-based hearing, shielding state actors from scrutiny even after charges

were dismissed. Petitioner's motions for reimbursement of wrongfully forfeited bail and legal fees met the same fate.

(See App'x A.3.2, *Reimbursement and Expungement*. App'x C.2.3 "Standing Order")

This administrative blockade spanned multiple venues, reflecting a collaborative effort by private and public legal professionals to insulate the State from accountability.

Judicial Bias

Petitioner asserts that repeated denials of critical motions, coupled with reliance on discredited evidence, raise serious concerns about judicial impartiality. *Caperton v. A.T. Massey Coal Co., Inc.*, 556 U.S. 868 (2009), stresses that courts must ensure even the appearance of bias does not taint due process. Here, Petitioner believes the judiciary's refusal to address credible allegations of wrongdoing reveals an environment where the "probability of actual bias" was unacceptably high.

(See App'x C.2.1, *Petition for Writ of Prohibition*, App'x D.2.1 *Judicial and Prosecutorial Motions filed and Obstructed*, C.1.3. *Registry of Actions "Deficiency"*).

Collusive Representation and Sixth Amendment Concerns

Petitioner also alleges a Sixth Amendment violation arising from "collusive" or passive representation by both private and court-appointed attorneys who deferred to prosecutorial misrepresentations. *Strickland v. Washington*, 466 U.S. 668 (1984), mandates effective counsel; yet these attorneys, Petitioner contends, neither contested the fabricated evidence nor raised clear constitutional infirmities, further entrenching systemic misconduct.

(See App'x C.1.4. *Past Civil Case Orders & Complaints* (2020 & 2022), C.2.1. *Petition for Writ of Prohibition Against Judge Dietrich*, C.2.2. *Judicial Standards Complaint*, all of App'x Section A.3)

Retaliatory Tactics and Vindictiveness

For nearly a decade, the Petitioner faced a baseless prosecution—an overt abuse of prosecutorial discretion intended to retaliate and silence. Sustaining charges on fabricated or invalid evidence inflicted severe financial, reputational, and emotional harm, compounding due process and equal protection violations. The orchestrated “failure to appear” by Judge Dietrich and Prosecutor Jenna Peterson-Haler November of 2023 served as a last-ditch effort to conceal the BCA report’s misrepresentation and overall fraud on the court, while evading the constitutional issues Petitioner had raised through motions and filings before the pretrial conference. This plan was further bolstered by an extradition warrant in 2024—coordinated with Attorney General Keith Ellison and Governor Tim Walz—relying on misrepresented documentation and since-disproven 2015 evidence, with no acknowledgment of any intervening developments during the nearly decade-long wrongful prosecution.

*(See App’x A.3.4, *Bail Documentation, and Extradition Documentation, C.2.1. Petition for Writ of Prohibition Against Judge Dietrich, D.2.1 Disqualification Motions Obstructed Chief Judge Oversight*)*

Procedural barriers and systemic bias further evidenced the prosecution’s misuse of authority, forcing the Petitioner to endure prolonged legal harassment without valid evidentiary support. *Blackledge v. Perry*, 417 U.S. 21 (1974), demonstrates where a prosecution or added charges appear to retaliate against a defendant’s assertion of legal rights. There, the Supreme Court underscored that prosecutorial actions motivated by a desire to punish or intimidate a defendant for exercising constitutional rights violate the Due Process Clause. The Petitioner also cites excessive bail and fraudulent extradition—imposed as retaliation for pursuing misconduct claims—thereby heightening the financial burden of an already baseless prosecution. *Timbs v. Indiana*, 586 U.S. ____ (2019), emphasizes that courts cannot set financial conditions in a manner that is unjustly punitive. Petitioner contends that such bail practices, combined with administrative stonewalling, served as retaliatory measures to discourage legitimate legal challenges.

(See App’x A.3.4 Order for Conditional Release)

Altogether, Petitioner argues that these barriers, destroyed evidence, implied judicial bias, and collusive legal representation combined to subvert fundamental due process protections—necessitating immediate federal oversight.

(See App'x C.3.2, Documentation from Law Firm Chemical Analysis and Correspondence.)

V. Summary Affirmance on Appeal

When Petitioner appealed (Case No. 24-2639), the Eighth Circuit summarily affirmed under Rule 47A(a) (*see App'x E*), declining to consider whether the State's admission of fraud negated the basis for dismissal. Citing procedural limits and abstention doctrines, the appellate court did not engage with the central due process question. Petitioner contends this failure to address newly revealed facts about the nonexistent chemical analysis amounted to sanctioning systemic misconduct.

REASONS FOR GRANTING THE PETITION

I. Immediate Intervention Is Required to Remedy Past and Halt Ongoing Constitutional Violations

The Fourteenth Amendment’s Due Process Clause (*see App ’x E*) categorically forbids criminal proceedings premised on fabrication, perjury, or suppressed exculpatory evidence. Yet nearly a decade of prosecutorial and judicial reliance on demonstrably false facts persisted under the cloak of *Younger abstention*. *See Napue v. Illinois*, 360 U.S. 264 (1959); *Giglio v. United States*, 405 U.S. 150 (1972). Once the State conceded no legitimate chemical analysis existed—demolishing the prosecution’s central premise—continuing deference to that flawed proceeding equates to endorsing a blatant violation of constitutional rights. Only immediate federal intervention can halt ongoing harm, restore integrity to the judicial process, and confirm that procedural rules do not eclipse core due process safeguards.

II. Procedural Barriers and Misuse of Rule 47A(a) Deprive Petitioner of a Fair Forum

On October 24, 2024, the Eighth Circuit summarily affirmed the district court’s dismissal under Rule 47A(a) (*see App ’x E*), calling Petitioner’s appeal “insubstantial.” This conclusion came despite Petitioner’s supplemental documentation—submitted before judgment—proving that no valid chemical test ever existed. Rather than confronting this crucial development, the appellate court relied on Rule 47A(a) to sidestep meaningful inquiry into prosecutorial misconduct and judicial bias. Contravening its obligation to rigorously scrutinize serious due process violations, the Eighth Circuit dismissed the appeal without examining whether the State’s own admission negated prior findings. As a result, the court effectively disregarded Petitioner’s constitutional claims, eroding the principle that grave allegations of state misconduct merit full judicial review.

Moreover, the Eighth Circuit’s strict word limits and repeated refusals to accept filings—despite Petitioner’s pro se status—undermined the liberal construction standard set forth in *Haines v. Kerner*, 404 U.S. 519 (1972). Key evidence, including destroyed records and the State’s admission of no valid

chemical analysis, went unexamined. Rather than reconciling the tension between *Younger* deference and established prosecutorial fraud, the court invoked Rule 47A(a) as a procedural shield, disregarding the magnitude of the due process failures alleged.

III. Procedural Obstruction in the Eighth Circuit: Denial of Rehearing and Misapplication of Local Rule 40A(c)

After the summary affirmance, Petitioner sought rehearing to address the newly surfaced evidence of prosecutorial misconduct and fraud. Yet on November 22, 2024, the court denied the petition solely for exceeding word limits, not on its merits. Petitioner immediately moved for leave to file an overlength petition, explaining the complexity of the constitutional claims.

(See: *App'x A.2.4. Rehearing Petitions & Orders – Overlength, Motion to File Overlength*)

Nevertheless, on November 27, 2024, the court again denied the request under **Local Rule 40A(c)** (see *App'x E*), which bars “successive petitions for rehearing”—a rule inapplicable here because Petitioner only aimed to correct a technical deficiency.

(See: *App'x A.2.4. Rehearing Petitions & Orders – Application of Rule 40A(c), Petitioner's Petition for Rehearing*)

By rigidly applying local rules, the Eighth Circuit forestalled any substantive review of prosecutorial wrongdoing and left Petitioner with no forum to demonstrate why federal judicial intervention is crucial. *See Haines v. Kerner*, 404 U.S. 519 (1972) (requiring lenient construction for pro se filings). Without thorough appellate scrutiny, alleged misconduct and the lack of a valid chemical analysis remain unaddressed, directly posing the question whether *Younger* abstention can persist despite demonstrable fraud.

IV. Real-World Consequences of Denying Injunctive Relief

Denying injunctive relief exacts broad, continuing harm well beyond a procedural dispute. Even with formal dismissal, Petitioner suffers financial ruin, reputational damage, and systemic barriers to meaningful review. This Court has recognized that unchecked government misconduct fosters a cycle of irreparable injury, contravening Fourteenth Amendment protections. *See Mathews v. Eldridge*, 424 U.S. 319 (1976).

(See: A.3.2. Motion for Reimbursement & Expungement (Sept. 18, 2024))

Petitioner's prolonged losses—wrongful bail forfeitures, mounting legal fees—are tangible injuries, magnified by a compromised state forum where “remedies” prove hollow. *Winter v. NRDC*, 555 U.S. 7 (2008), underscores the need for immediate relief to prevent irreparable harm. Each day without judicial oversight entrenches the Petitioner's economic burdens.

Blocked Avenues for Court Review: Local officials continue using administrative rules to reject or ignore motions, effectively denying Petitioner a path to clear his record or recover losses. In such an environment, the Petitioner's injuries persist without redress, heightening constitutional infractions.

Public Trust and Systemic Implications: Unchallenged governmental fraud and judicial complicity corrode faith in the justice system. If misconduct is deemed tolerable, it emboldens further abuses and undermines constitutional fidelity.

Perpetuation of Procedural Obstructions: Even post-dismissal, new hurdles—like the “Paragraph 6” deficiency notices—prevent Petitioner from seeking reimbursement or accountability. *See App 'x C.2.3.* Only a swift injunction can end these tactics, safeguard civil liberties, and reinforce the rule of law. These injuries go beyond simple procedural correctness; they strike at the heart of due process’ “practical force.”

Had the lower courts fulfilled even a minimal duty of review, the glaring mismatch on the BCA report—for example—lacking Petitioner's name and other systemic irregularities would have been immediately

apparent. Instead, by summarily deferring to the State's assertions and denying meaningful relief, each court ratified a decade-long prosecution built upon a demonstrably false premise. This oversight exemplifies why federal intervention is now indispensable: only robust judicial scrutiny can rectify a record so tainted by unexamined error.

(See: App 'x A.3.5. BCA Submission)

V. The Intersection of Younger Abstention and Systemic Fraud Demands Clarification

Younger abstention typically reflects a comity-based presumption that state courts vindicate federal rights. But that presumption fails where the underlying state process is irredeemably compromised. Over nearly a decade, prosecutorial misconduct, fabricated evidence, and judicial complicity here illustrate that mere "deference" enshrined violations rather than corrected them. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009), shows courts must police even the appearance of bias, especially when fraud remains unaddressed.

When *Younger* is applied mechanically, misconduct flourishes unchecked. The State's acknowledgment that it never performed a valid test eviscerates the prosecution's basis, prompting the key question: can federal courts remain hands-off despite indisputable fraud in the state forum? If not curtailed, *Younger* becomes a shield for government wrongdoing, infringing core due process rights. Only this Court can clarify *Younger*'s limits where irreparable harm is apparent and ongoing. Otherwise, fundamental fairness erodes, and the judicial system's legitimacy suffers.

VI. Reasons Relied on for Allowance of the Writ Explicitly referencing Rule 10 and Rule 14.1(h)

(Addressing Rule 10 and Rule 14.1(h))

1. Departure from Accepted Judicial Proceedings and Serious Miscarriage of Justice

Under Rule 10(a), the Supreme Court's supervisory power is warranted when lower courts depart "from the accepted and usual course of judicial proceedings." In this case, the Minnesota courts

and the Eighth Circuit summarily affirmed and declined to review newly revealed evidence of prosecutorial fraud—namely, **the complete absence of a valid chemical test, the misrepresentation of BCA testing and the late “amended” BCA report omitting Petitioner’s name**. By allowing a near-decade-long prosecution to proceed on a misrepresentation, and then ignoring the State’s ultimate concession that no legitimate test existed during an almost decade long wrongful prosecution, the courts below **deviated from fundamental due process norms**. This disregard for the most basic evidentiary scrutiny constitutes a stark departure from accepted procedures.

2. Unresolved Conflict with Well-Established Supreme Court Precedent

The Supreme Court has long held that prosecutions may not rest on false, withheld, or misleading evidence. See, e.g., **Brady v. Maryland**, 373 U.S. 83 (1963); **Mooney v. Holohan**, 294 U.S. 103 (1935). Yet here, evidence crucial to probable cause—the alleged “chemical analysis”—was never performed. Despite the State’s eventual admission, the Eighth Circuit summarily dismissed Petitioner’s claims without addressing the fraud. This is precisely the type of systemic error that **Rule 10(c)** identifies: a “conflict with relevant decisions of this Court.” Petitioner’s constitutional challenges should have prompted rigorous appellate review, but instead they were brushed aside, creating a serious conflict with Brady, Mooney, and related precedent.

3. Questions of National Importance Involving Younger Abstention Despite Proven Prosecutorial Fraud

Rule 10(b) further underscores the Court’s role in clarifying important questions of federal law. Younger abstention is typically meant to preserve comity, but it cannot excuse or perpetuate a prosecution based on undisputed prosecutorial misconduct and fabricated evidence. The Eighth Circuit’s approach—foreclosing any inquiry merely due to ongoing state proceedings—invites government actors to hide constitutional violations behind “abstention,” effectively immunizing

them from federal scrutiny. This poses a significant threat to due process nationwide, demanding this Court's intervention to confirm that **Younger** cannot shield proven fraud from correction.

4. **Certiorari-Worthy Under Rule 14.1(h)**

Pursuant to **Rule 14.1(h)**, Petitioner explicitly states the "reasons relied on for the allowance of the writ," which correspond to the criteria outlined in **Rule 10**:

- **Extraordinary departure** from accepted standards of judicial review, as no court ever examined the State's concession of a nonexistent chemical test (Rule 10(a)).
- **Conflicts with Supreme Court precedent** on the duty to correct false evidence and ensure due process (Rule 10(c)).
- **National importance** in clarifying **Younger**'s limits when faced with indisputable prosecutorial fraud (Rule 10(b)).

*In sum, these grounds plainly satisfy the Court's well-established criteria for granting certiorari. The refusal of lower courts to engage with essential due process issues—amid proven misrepresentations—raises far-reaching concerns about the integrity of the judicial process and the proper scope of **Younger** abstention.*

CERTIFICATE OF COMPLIANCE (IFP Filing Under Rule 33.2(b))

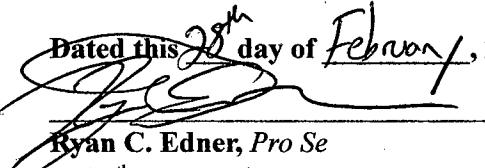
Pursuant to Supreme Court Rule 33.2(b), I hereby certify that the attached **Petition for a Writ of Certiorari**:

1. Is prepared on 8.5" x 11" paper in 12-point Times New Roman font and is double-spaced (except for headings, footnotes, and indented quotations).
2. Contains **4,669 words** (excluding the parts exempted by Supreme Court Rule 33.2), as determined by the word-count function of the word-processing system of **MSO (Version 2412 Build 16.0.18324.20092)**.
3. **Does not exceed 40 pages**, exclusive of the cover, tables, and appendix materials.

I further certify that this Petition complies with **all requirements** of Rule 33.2 for in forma pauperis filings.

I declare under penalty of perjury that all statements contained herein are true and correct to the best of my knowledge, information, and belief.

Dated this 28th day of February, 2025


Ryan C. Edner, Pro Se
416 4th Ave North
Wahpeton, ND 58075-4404