

No: 25-____

IN THE
Supreme Court of the United States

SAUL BRIGGS,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. Whether this Honorable Court should grant *certiorari* to review whether the Sixth Circuit's determination that the good faith exception applies to the search warrant in this case which was bare bones, lacked probable cause, and lacked a sufficient nexus between the residence searched and the evidence sought was in err.

PARTIES TO THE PROCEEDING

The parties to the proceedings, both in the Federal District Court for the Western District of Michigan as well as in the United States Court of Appeals for the Sixth Circuit, included the United States of America, Respondent herein, and Saul Briggs, the Petitioner herein. There are no parties to these present proceedings other than those named in the Petition.

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PETITION FOR A WRIT OF CERTIORARI

Mr. Saul Briggs (hereinafter “Mr. Briggs”) hereby respectfully petitions for a writ of certiorari to review the opinion and judgment of the United States Court of Appeals for the Sixth Circuit issued December 17, 2024.

OPINIONS BELOW

The Decision of the Sixth Circuit in this matter was issued on December 17, 2024. The Decision is unpublished, but can be found at the following citation *United States v. Briggs*, No. 23-1963, 2024 WL 5135701, (6th 2023), and is reproduced at Petitioner’s Appendix A.

The District Court’s Opinion and Order denying Mr. Briggs Motion to Suppress which is the basis of his appeal was not published, but is reproduced at Petitioner’s Appendix B.

The relevant District Court Judgment underlying Mr. Briggs’s conviction was not published, but is reproduced at Petitioner’s Appendix C.

STATEMENT OF JURISDICTION

Because the underlying case involved a federal indictment against Mr. Briggs for violations of federal law, the United States District Court for the Western District of Michigan, had jurisdiction pursuant to 18 U.S.C. §3231. Because Petitioner Briggs timely filed a notice of appeal from the final judgment of a United States District Court, the United States Court of Appeals for the Sixth Circuit had jurisdiction pursuant to 28 U.S.C. §1291. Because Petitioner Briggs is timely filing this Petition for Writ of Certiorari within the time allowed by the Supreme Court Rules from the

Sixth Circuit's Decision on December 17, 2024, this honorable Court has jurisdiction pursuant to 28 U.S.C. §1254. *See also*, Supreme Court Rule 13.1.

STATUTORY PROVISIONS AND RULES OF COURT INVOLVED

This case does not involve statutory provisions or rules of court, however, it does involve the Fourth Amendment to the United States Constitution which is set out verbatim below and attached as Petitioner's Appendix D.

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.

U.S. Const Amend IV.

STATEMENT OF THE CASE

Mr. Briggs is currently serving a two-hundred-and-forty-month prison term. On July 12, 2022, Defendant-Appellant Saul Briggs (hereinafter “Mr. Briggs”) was the sole defendant in a five count Indictment issued by a federal grand jury in the United States District Court for the Western District of Michigan. (Indictment, RE 15, PAGEID #34-44). Mr. Briggs was charged in Count 1 with Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances in violation of 21 U.S.C. §846 and 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi),(b)(1)(B)(i) and (vii), (b)(1)(C), in Count 2 with Possession with Intent to Distribute Controlled Substances in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi),(b)(1)(B)(i) and (vii), (b)(1)(C), in Count 3 with Possession of Firearms in Furtherance of Drug Trafficking in violation of 18 U.S.C. §924(c)(1)(A)(i), in Count 4 with Possession of a Firearm by a Convicted Felon in violation of 18 U.S.C. § 922(g)(1), 18 U.S.C. §924(a)(2), and 18 U.S.C. §921(a), and in Count 5 with Maintaining a Drug-Involved Premises in violation of 21 U.S.C. §856(a)(1), (b). *Id.*

On February 2, 2023 Mr. Briggs, through counsel filed two motions to suppress – the first asking the court to suppress *Wiretap Evidence* and the second requesting suppression a *Search at 2060 Letart Avenue*. (MTS Wiretap, RE: 35, PAGEID# 94-113; MTS Letart, RE: 38, PAGEID# 116-130). The motions were heard before the trial court on March 8, 2023. (Opinion MTS, RE: 55, PAGIED# 301). Defense counsel withdrew the wiretap motion at the hearing and the trial

court denied Mr. Briggs motion to suppress the search at the Letart address. *Id.* at PAGEID# 301-315.

The parties then entered into a plea agreement and Mr. Briggs entered a guilty plea to counts two and three of the Indictment on March 20, 2023. (Plea Agreement, RE: 56, PAGEID# 316-330; T.p. Plea, RE: 83, PAGEID# 484-501). Ultimately, Mr. Briggs was sentenced to a total term of imprisonment of three hundred months to be followed by supervised release for a term of ten years. (Judgment, RE 80, PAGEID #472-478).

Defendant's guilty plea was conditional in that he reserved his right to appeal the trial court's adverse finding on his motion to suppress. *Id.* at PAGEID# 316. Defendant's motion to suppress challenged a search at 2060 Letart Avenue. (MTS Letart, RE: 38, PAGEID# 116-130). The crux of the argument made in Mr. Briggs motion was that despite having Mr. Briggs under surveillance for suspected drug trafficking for three years, having numerous warrants for tracking Mr. Briggs location, cell phone, and emails, absent the illegal search of the Letart residence, the government has no tangible evidence linking Mr. Briggs to drug trafficking activity. (Affidavit, RE: 49, PAGEID# 266-295; *See also* MTS Letart, RE: 38, PAGEID# 116-130).

The trial court heard Mr. Briggs motion to suppress on March 8, 2023. (T.p. MTS, RE: 690, PAGEID# 689-723). There was not any testimony or evidence presented at the hearing, counsel for both parties made arguments based on the

information contained in the “four corners” of the affidavit. *Id.*; *See also* Affidavit, RE: 49, PAGEID# 266-295.

In arguing the motion defense counsel, first, withdrew his motion to suppress wiretap evidence and then proceeded to point out the bare bones nature of the affidavit relied upon for the search warrant obtained for the Letart residence.

(MTS Letart, RE: 38, PAGEID# 116-130; Affidavit, RE: 49, PAGEID# 266-295).

The affidavit for search warrant contained no allegations that law enforcement was able to identify any drug transaction or contraband in the Letart residence prior to the search. (T.p. MTS, RE: 102, PAGEID# 691-696). During the course of this three year investigation, law enforcement executed numerous search warrants and never obtained any narcotics or other contraband related to the Letart residence – they searched the house of an alleged associate to Mr. Briggs, Mr. Lang Knight and did not find any contraband, they performed a traffic stop of Mr. Briggs after what was believed to be a drug transaction and again no contraband was found not even the odor of marijuana, and they have numerous wiretaps and again have no evidence of narcotics at the Letart residence. *Id.*

The one phone call used to support the search was between Mr. Briggs and another alleged associate, Mr. Hathorn, on March 9, 2022 which was completely devoid of any discussion of drugs or the use of any known drug slang or lingo. *Id.* Law enforcement interpreted the following conversation as a discussion for the exchange of one kilogram of fentanyl for \$50,000:

BRIGGS: We gonna come down there. I said we gonna pull up
 on you.

HATHORN: You said what? Oh yea, I – I like that.

BRIGGS: A'right. Imma um, I'm finna see you. When I pull up, I'm finna let you know.

HATHORN: What, uh, what, let me know the ticket what I tried to tell you.

BRIGGS: Um, shit, what you, what you, what you, what you was trying to do?

HATHORN: I mean, depends on the ticket. If the ticket good, I'll grab a whole one.

BRIGGS: U, oh, I been doin', I been, I been, I been doin' 'em at 50. Bro, you.

HATHORN: Yeah, bring me one of them.

(Affidavit, RE: 49, PAGEID# 275).

While law enforcement tracked Mr. Briggs during what they believe was the exchange related to the March 9 phone call and then pulled him over, no narcotics or other contraband were recovered. (T.p. MTS, RE: 102, PAGEID# 691-696). Nor did law enforcement search Mr. Hathorn or the location where this transaction is alleged to have occurred. *Id.* Law enforcement then began surveilling the Letart residence. *Id.* Law enforcement never observed narcotics in the Letart residence, they do not have any evidence of any drug transactions there, they do not have any confidential informants who can attest to contraband in the residence. *Id.* Law enforcement has people coming and going daily from the residence, including Mr. Briggs, they know Mr. Briggs has a prior drug trafficking conviction and is

associating with a former drug trafficking associate, they have Mr. Briggs and others coming and going with boxes or packages (which were never confirmed to contain narcotics), and they have an assumption that the house is vacant. *Id.* This information lead law enforcement to make the leap and deem the Letart residence to be a stash house. *Id.*

The trial court and the government raised the issue of whether Mr. Briggs had standing to challenge the search. (T.p. MTS, RE: 102, PAGEID# 696-697; Government's Response to MTS, RE: 47, PAGEID# 253-254). The government conceded, Mr. Briggs was at the Letart residence on a daily basis and was able to come and go on his own and control the contents of the house. (Government's Response MTS, RE: 47, PAGEID# 253-254). Given Mr. Briggs ability to come and go on his own and that he was found at the residence alone during the search, it can be easily inferred that Mr. Briggs had a key to the residence. (T.p. MTS, RE: 102, PAGEID# 697-698). Further, Mr. Briggs may have received mail at the residence. *Id.* Finally, Mr. Briggs' sentence was enhanced for maintaining a drug premises. (PSIR, RE: 64, PAGEID# 384 at 44).

The trial court ultimately denied Mr. Briggs' motion to suppress finding the Mr. Briggs did not have standing to challenge the search and further, even if he did have standing, the affidavit for search was supported by probable cause and contained a sufficient nexus between the Letart residence and the evidence of drug trafficking sought by law enforcement. (Order MTS, RE: 55, PAGEID# 301-315).

Mr. Briggs timely appealed the judgment of sentence to the Sixth Circuit raising only one issue challenging the trial court's denial of his motion to suppress. (Notice of Appeal, RE: 82, PAGEID# 483). The trial court's decision was affirmed on appeal. (Exhibit A).

REASONS FOR GRANTING THE WRIT

The issues Mr. Briggs brings to this Honorable Court's attention are important constitutional issues implicating the Fourth Amendment right against unreasonable search and seizure.

The bare bones affidavit for search warrant of the Letart residence violated the Fourth Amendment because it lacked the necessary probable cause and a sufficient nexus between the Letart residence and the drug trafficking evidence the police sought through this search warrant. The affidavit did not contain any evidence of any drug transactions occurring at the Letart residence, nor any evidence that any actual narcotics or other contraband had been seen in the residence. (Affidavit, RE: 49, PAGEID# 266-295).

Applying the exclusionary rule to this search is necessary to serve the purposes of the Fourth Amendment – to deter unlawful searches and police conduct and preserve judicial integrity. *Terry v. Ohio*, 392 U.S. 1, 88 S.Ct. 1868, 1875 (1968). Application of the good faith exception to the exclusionary rule here would not preserve these important functions of the Fourth Amendment.

The Sixth Circuit upheld the trial court's decision on Mr. Briggs Motion to Suppress finding that the good faith exception applied. This decision goes against the Sixth Circuit's own precedent and rewards the bad behavior of law enforcement. The officers in this case were determined that Mr. Briggs "status" as a drug dealer because of his prior conviction meant he was trafficking drugs, they made broad and unsupported assumptions and jumped the gun on this warrant. These were elite

officers, officer who are experienced in applying for these types of warrants, these officers knew better. However, these same officers submitted a bare bones warrant lacking any evidence of controlled buys, actual drug transactions, or confiscation of any drugs.

Awarding this bad police conduct undermines the Fourth Amendment and sets a bad precedent for future searches lacking probable cause. Review by this Honorable Court is necessary to keep intact the principles and rights guaranteed to criminal defendants by the Fourth Amendment.

I. *Certiorari* is requested to review whether the Sixth Circuit's determination that the good faith exception applies to the search warrant in this case which was bare bones, lacked probable cause, and lacked a sufficient nexus between the residence searched and the evidence sought was in error.

The trial court denied Mr. Briggs' motion to suppress finding that Mr. Briggs did not have standing to challenge the search and further, even if he did have standing, the affidavit for search was supported by probable cause and contained a sufficient nexus between the Letart residence and the evidence of drug trafficking sought by law enforcement. (Order on MTS, RE 55, PAGEID# 301-315). The Sixth Circuit affirmed the trial court on different grounds finding that the good faith exception applied. *States v. Briggs*, No. 23-1963, 2024 WL 5135701, (6th 2023).

In his brief to the Sixth Circuit Mr. Briggs made three arguments related to the search warrant at issue. Mr. Briggs challenged the trial court's denial of his motion to suppress the search of the Letart residence asserting that he had

standing to challenge the search as he came and went from the residence on his own, thus exercising control of the residence. *See United States v. Robbins*, No. 3:05-CR-32, 2006WL232315, at *28 (E.D. Tenn. Aug 9, 2006); *United States v. King*, 227 F.3d 732, 744 (6th Cir. 2000). Further, Mr. Briggs argued the affidavit for search warrant of the Letart residence did not establish probable cause or a sufficient nexus between the Letart residence and the evidence law enforcement expected to find there. Law enforcement investigating Mr. Briggs lacked any knowledge of drug transactions, narcotics, or any contraband at the Letart residence; their affidavit was entirely based on unsupported assumptions.

Finally, Mr. Briggs argued the good faith exception does not apply in this case as the affidavit was “bare bones” and the warrant’s validity was objectively unreasonable. The good faith exception only applies when a “reasonably trained officer” would not have known the search was illegal despite authorization from a judge. *United States v. Leon*, 468 U.S. 897, 104 S.Ct. 3405, 3420 at fn. 23 (1984). An officer’s reliance on an affidavit is unreasonable when “a reasonably well-trained officer would have known that the search was illegal despite the magistrate’s decision.” *United States v. Hodson*, 543 F.3d 286, 293 (6th Cir. 2008) *quoting United States v. Helton*, 314 F.3d 812, 824 (6th Cir. 2003). The affidavit in this case was so lacking in probable cause and the required nexus, no reasonable trained officer could have relied on it.

The Sixth Circuit did not address standing or probable cause in its decision and only focused on the good faith exception. Thus Mr. Briggs argument herein will focus on the same.

The good faith exception to the exclusionary rule does not apply in this case because the affidavit itself was “bare bones,” so lacking in probable cause to render reliance on it unreasonable. The good faith exception applies when a “reasonably trained officer” would not have known the search was illegal despite authorization from a judge. *United States v. Leon*, 468 U.S. 897, 104 S.Ct. 3405, 3420 at fn. 23 (1984). The test for whether an officer’s reliance is reasonable inquires “whether a reasonably well-trained officer would have known that the search was illegal despite the magistrate’s decision.” *United States v. Hodson*, 543 F.3d 286, 293 (6th Cir. 2008) quoting *United States v. Helton*, 314 F.3d 812, 824 (6th Cir. 2003).

An affidavit that fails to establish the necessary and required nexus between the proposed location of the search and the evidence sought to be seized is “so lacking in indicia of probable cause” that no officer could have reasonably relied on the warrant. *United States v. Hython*, 443 F.3d 480, 488-489 (6th Cir. 2006); *United States v. Brown*, 828 F.3d 375, 385-386 (6th Cir. 2016). *Brown* is factually similar and, in that case, the Sixth Circuit held the good faith exception did not apply. *Brown*, at 385-386.

“The connection between the residence and the evidence of criminal activity must be specific and concrete, not “vague” or “generalized.”” *United States v. Brown*, 828 F.3d 375, 382 (6th Cir. 2016). The question of the whether an affidavit

contains a sufficient nexus between the evidence sought and the place to be searched “is a fact intensive question resolved by examining the totality of the circumstances presented.” *Id.*

The affidavit in this case does not contain any evidence that narcotics or any contraband were ever seen at or connected to the Letart residence. (Affidavit, RE: 49, PAGEID# 266-295). The March 9, 2022 intercepted phone call does not directly connect any activity to Letart specifically and it extremely vague bearing no indication of known drug slang or lingo as the trial court itself noted. *Id.* at PAGEID# 275; Order MTS, RE: 55, PAGEID#302 at fn. 4. Observation of defendant, a “known drug dealer” coming and going from the residence on a daily basis, high traffic in and out of the residence including frequent “short term” visits, boxes or packages being carried in and out, and assumptions that the house was vacant simply is not enough to satisfy the Fourth Amendment or the standard set forth by this Court.

More is required. For example as “facts showing that the residence had been used in drug trafficking, such as an informant who observed drug deals or drug paraphernalia in or around the residence,” a controlled buy, drug purchases made by an informant, drug transactions observed by an informant at the location of the proposed search, or at a minimum, some observation of some drug activity or contraband in the residence. *Brown* at 383 citing *United States v. Jones*, 159 F.3d 969, 974-975 (6th Cir. 1998); *United States v. Ellison*, 632 F.3d 347, 349 (6th Cir. 2011); *United States v. Berry*, 565 F.3d 332, 339 (6th Cir. 2009). The Sixth Circuit’s

decision goes against its own precedent. The Sixth Circuit has consistently required more evidence to show a connection between the residence to be searched and the evidence sought than the bare bone affidavit for the Letart search provides. The decision below does not align with the Sixth Circuit's own precedent.

In *Brown*, this Court found an insufficient nexus where the affidavit was void of any evidence that drug activity occurred or narcotics were stored at the searched residence. *Brown* at 382. Brown's car testing positive for narcotics during a canine search at another residence was not a sufficient enough connection to search the residence despite his status as a "known drug dealer." *Id.* at 382-383. Here, the affidavit alleges that officers observed a drug transaction, however, no drugs were seized from this alleged transaction. (T.p. MTS, RE: 102, PAGEID# 691-696).

In *Carpenter* the Court determined that helicopter surveillance indicating numerous marijuana plants growing near the searched residence and a road leading from the plants to the residence did not establish a sufficient nexus. *Carpenter* at 593. In *McPhearson*, the defendant having been arrested at the same residence for separate non drug related offense and being found to have a quantity of narcotics on his person was insufficient. *United States v. McPhearson*, 469 F.3d 518, 524-525 (6th Cir. 2006). In *Higgins*, the court found the nexus insufficient where an informant had purchased drugs from the defendant, but had not been inside the residence or ever seen a drug transaction or contraband inside the residence. *United States v. Higgins*, 557 F.3d 381, 390 (6th Cir. 2009). Again, the Sixth Circuit's decision in this case is not in alignment with it's own precedent.

Similarly, in *Grant* the Court found the nexus insufficient even though there had been a controlled buy involving the defendant. *United States v. Grant*, No. 21-3686, 2023WL119399, at *3 (6th Cir. Jan. 6, 2023). The only tie the defendant had to the searched residence was that he had parked there, but the controlled buy did not occur at the searched residence. *Id.* Police observed the defendant making short visits to the searched residence which this Court deemed were arguably suspicious, but the facts were insufficient to establish the required connection. *Id.*

Where officers have significant subjective knowledge of an investigation because of their involvement in it, they may be less likely to notice deficiencies in a warrant. *Hython* at 489. However, subjective knowledge does not render an insufficient affidavit valid or provide an escape from the exclusionary rule. *Id.* at 488-489; *See also United States v. Hodson*, 543 F.3d 286, 293 (6th Cir. 2008)(subjective knowledge is not sufficient for a finding of good faith).

While the officers involved in investigating Mr. Briggs case likely had subjective knowledge as they had been surveilling Mr. Briggs for three years, that does not trigger the good faith exception in this case. As discussed in more length above, the affidavit in this case lacked the necessary probable cause and the required nexus between the place to be searched and evidence to be seized. Such an affidavit does not qualify for the good faith exception as no reasonable officer should believe the warrant to be valid.

Upholding this search and applying the good faith exception here would reward bad conduct of law enforcement. These officers were determined that Mr.

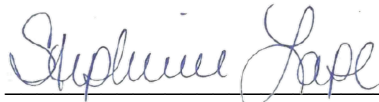
Briggs “status” as a drug dealer because of his prior conviction meant he was trafficking drugs, they made broad and unsupported assumptions and jumped the gun on this warrant. These were elite officers, officer who are experienced in applying for these types of warrants, these officers knew better.

The Sixth Circuit erred in holding the good faith exception applied to the search warrant in this case. This matter must be remanded.

CONCLUSION

Wherefore, and for all of the foregoing reasons, Petitioner Briggs respectfully requests that this honorable Court grant certiorari to review the decision of the United States Court of Appeals for the Sixth Circuit.

Respectfully Submitted,



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