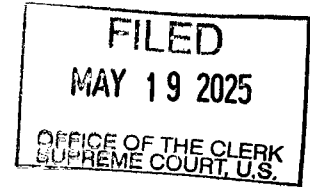


24-7308

ORIGINAL

PETITION FOR WRIT OF CERTIORARI

IN THE SUPREME COURT OF THE UNITED STATES



ZACHARY CROUCH, )  
404 Chickamauga Ave. )  
Knoxville, TN 37917 )  
Tel: 702-843-3457 )  
Petitioner, )  
v. )  
BRADEN GODDARD, et al., )  
C/O Thompson McMullan )  
Attorney for Respondents )  
100 Shockoe Slip )  
Richmond, Virginia 23219-4140 )  
Respondents. )

*On Petition for a Writ of Certiorari to*

*United States Court of Appeals for the Fourth Circuit, Case No. 24-1803*

---

[Oral Argument Requested]

## QUESTION(S) PRESENTED

The questions presented for review include whether state sovereign immunity can be and should be applied to unofficial acts and federal laws of copyright infringement and fraud. This is a question of law, *de novo*, because when the Constitution of the United States or laws of the United States directly contradict a law or statute of the State of Virginia, a decision must be made to make clear boundaries of what details of the civil proceedings will agree with the Constitution of the United States and laws or statutes of the State of Virginia. Specifically, in this proceeding the law or statute of the State of Virginia is sovereign immunity. On the other hand, the Constitution of the United States has copyright protection laws, federal fraud laws, and denounces itself as the Supreme Law of the Land. Also, federal copyright infringement laws contradict state sovereign immunity laws as well because you cannot simply enforce both at the same time unless new laws are created.

## LIST OF PARTIES

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

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

Braden Goddard

Zeyun Wu

## RELATED CASES

There were no related cases found to this case.

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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 A 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 B 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 \_\_\_\_\_ 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 \_\_\_\_\_ 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.

## JURISDICTION

☒ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was February 18, 2025.

☒ 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 \_\_\_\_\_.  
A copy of that decision appears at Appendix \_\_\_\_\_.

☐ A timely petition for rehearing was thereafter denied 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. § 1257(a).

### **FILING DATES OF THE APPEAL**

The United States Court of Appeals for the Fourth Circuit made a judgment on the civil case no. 24-1803 on February 18, 2025. This petition for writ of certiorari was submitted to the Supreme Court of the United States on May 19, 2025. This filing date of the appeal falls within the 90-day time period to file the appeal to the Supreme Court of the United States.

### **ENUMERATION OF ERRORS**

- 1) The United States Court of Appeals for the Fourth Circuit wrongfully affirmed the judgment of the United States District Court for the Eastern District of Virginia which dismissed this case due to sovereign immunity.

### **STATEMENT OF THE ISSUE PRESENTED FOR REVIEW**

Whether the United States District Court for the Eastern District of Virginia erred in dismissing the counts listed in the complaint of civil no. 3:24cv114 on July 9, 2024. To wit, the United States District Court for the Eastern District of Virginia erred in granting sovereign immunity to unofficial acts of employees of Virginia Commonwealth University in civil no. 3:24cv114.



## CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

### *501. Infringement of copyright*<sup>3</sup>

(a) Anyone who violates any of the exclusive rights of the copyright owner as provided by sections 106 through 122 or of the author as provided in section 106A(a), or who imports copies or phonorecords into the United States in violation of section 602, is an infringer of the copyright or right of the author, as the case may be. For purposes of this chapter (other than section 506), any reference to copyright shall be deemed to include the rights conferred by section 106A(a). As used in this subsection, the term "anyone" includes any State, any instrumentality of a State, and any officer or employee of a State or instrumentality of a State acting in his or her official capacity. Any State, and any such instrumentality, officer, or employee, shall be subject to the provisions of this title in the same manner and to the same extent as any nongovernmental entity.

(b) The legal or beneficial owner of an exclusive right under a copyright is entitled, subject to the requirements of section 411, to institute an action for any infringement of that particular right committed while he or she is the owner of it. The court may require such owner to serve written notice of the action with a copy of the complaint upon any person shown, by the records of the Copyright Office or otherwise, to have or claim an interest in the copyright, and shall require that such notice be served upon any person whose interest is likely to be affected by a decision in the case. The court may require the joinder, and shall permit the intervention, of any person having or claiming an interest in the copyright.

(c) For any secondary transmission by a cable system that embodies a performance or a display of a work which is actionable as an act of infringement under subsection (c) of section 111, a television broadcast station holding a copyright or other license to transmit or perform the

same version of that work shall, for purposes of subsection (b) of this section, be treated as a legal or beneficial owner if such secondary transmission occurs within the local service area of that television station.

(d) For any secondary transmission by a cable system that is actionable as an act of infringement pursuant to section 111(c)(3), the following shall also have standing to sue: (i) the primary transmitter whose transmission has been altered by the cable system; and (ii) any broadcast station within whose local service area the secondary transmission occurs.

(e) With respect to any secondary transmission that is made by a satellite carrier of a performance or display of a work embodied in a primary transmission and is actionable as an act of infringement under section 119(a)(3), a network station holding a copyright or other license to transmit or perform the same version of that work shall, for purposes of subsection (b) of this section, be treated as a legal or beneficial owner if such secondary transmission occurs within the local service area of that station.

(f)(1) With respect to any secondary transmission that is made by a satellite carrier of a performance or display of a work embodied in a primary transmission and is actionable as an act of infringement under section 122, a television broadcast station holding a copyright or other license to transmit or perform the same version of that work shall, for purposes of subsection (b) of this section, be treated as a legal or beneficial owner if such secondary transmission occurs within the local market of that station.

(2) A television broadcast station may file a civil action against any satellite carrier that has refused to carry television broadcast signals, as required under section 122(a)(2), to enforce that television broadcast station's rights under section 338(a) of the Communications Act of 1934.

*502. Remedies for infringement: Injunctions*

(a) Any court having jurisdiction of a civil action arising under this title may, subject to the provisions of section 1498 of title 28, grant temporary and final injunctions on such terms as it may deem reasonable to prevent or restrain infringement of a copyright.

(b) Any such injunction may be served anywhere in the United States on the person enjoined; it shall be operative throughout the United States and shall be enforceable, by proceedings in contempt or otherwise, by any United States court having jurisdiction of that person. The clerk of the court granting the injunction shall, when requested by any other court in which enforcement of the injunction is sought, transmit promptly to the other court a certified copy of all the papers in the case on file in such clerk's office.

*503. Remedies for infringement: Impounding and disposition of infringing articles<sup>1</sup>*

(a)(1) At any time while an action under this title is pending, the court may order the impounding, on such terms as it may deem reasonable—

(A) of all copies or phonorecords claimed to have been made or used in violation of the exclusive right of the copyright owner;

(B) of all plates, molds, matrices, masters, tapes, film negatives, or other articles by means of which such copies or phonorecords may be reproduced; and

(C) of records documenting the manufacture, sale, or receipt of things involved in any such violation, provided that any records seized under this subparagraph shall be taken into the custody of the court.

(2) For impoundments of records ordered under paragraph (1)(C), the court shall enter an appropriate protective order with respect to discovery and use of any records or information that has been impounded. The protective order shall provide for appropriate procedures to ensure that

confidential, private, proprietary, or privileged information contained in such records is not improperly disclosed or used.

(3) The relevant provisions of paragraphs (2) through (11) of section 34(d) of the Trademark Act (15 U.S.C. 1116(d)(2) through (11)) shall extend to any impoundment of records ordered under paragraph (1)(C) that is based upon an ex parte application, notwithstanding the provisions of rule 65 of the Federal Rules of Civil Procedure. Any references in paragraphs (2) through (11) of section 34(d) of the Trademark Act to section 32 of such Act shall be read as references to section 501 of this title, and references to use of a counterfeit mark in connection with the sale, offering for sale, or distribution of goods or services shall be read as references to infringement of a copyright.

(b) As part of a final judgment or decree, the court may order the destruction or other reasonable disposition of all copies or phonorecords found to have been made or used in violation of the copyright owner's exclusive rights, and of all plates, molds, matrices, masters, tapes, film negatives, or other articles by means of which such copies or phonorecords may be reproduced.

*504. Remedies for infringement: Damages and profits<sup>5</sup>*

(a) In General.—Except as otherwise provided by this title, an infringer of copyright is liable for either—

(1) the copyright owner's actual damages and any additional profits of the infringer, as provided by subsection (b); or

(2) statutory damages, as provided by subsection (c).

(b) Actual Damages and Profits.—The copyright owner is entitled to recover the actual damages suffered by him or her as a result of the infringement, and any profits of the infringer

that are attributable to the infringement and are not taken into account in computing the actual damages. In establishing the infringer's profits, the copyright owner is required to present proof only of the infringer's gross revenue, and the infringer is required to prove his or her deductible expenses and the elements of profit attributable to factors other than the copyrighted work.

(c) Statutory Damages.—

(1) Except as provided by clause (2) of this subsection, the copyright owner may elect, at any time before final judgment is rendered, to recover, instead of actual damages and profits, an award of statutory damages for all infringements involved in the action, with respect to any one work, for which any one infringer is liable individually, or for which any two or more infringers are liable jointly and severally, in a sum of not less than \$750 or more than \$30,000 as the court considers just. For the purposes of this subsection, all the parts of a compilation or derivative work constitute one work.

(2) In a case where the copyright owner sustains the burden of proving, and the court finds, that infringement was committed willfully, the court in its discretion may increase the award of statutory damages to a sum of not more than \$150,000. In a case where the infringer sustains the burden of proving, and the court finds, that such infringer was not aware and had no reason to believe that his or her acts constituted an infringement of copyright, the court in its discretion may reduce the award of statutory damages to a sum of not less than \$200. The court shall remit statutory damages in any case where an infringer believed and had reasonable grounds for believing that his or her use of the copyrighted work was a fair use under section 107, if the infringer was: (i) an employee or agent of a nonprofit educational institution, library, or archives acting within the scope of his or her employment who, or such institution, library, or archives itself, which infringed by reproducing the work in copies or phonorecords; or (ii) a public

broadcasting entity which or a person who, as a regular part of the nonprofit activities of a public broadcasting entity (as defined in section 118(f)) infringed by performing a published nondramatic literary work or by reproducing a transmission program embodying a performance of such a work.

(3) (A) In a case of infringement, it shall be a rebuttable presumption that the infringement was committed willfully for purposes of determining relief if the violator, or a person acting in concert with the violator, knowingly provided or knowingly caused to be provided materially false contact information to a domain name registrar, domain name registry, or other domain name registration authority in registering, maintaining, or renewing a domain name used in connection with the infringement.

(B) Nothing in this paragraph limits what may be considered willful infringement under this subsection.

(C) For purposes of this paragraph, the term “domain name” has the meaning given that term in section 45 of the Act entitled “An Act to provide for the registration and protection of trademarks used in commerce, to carry out the provisions of certain international conventions, and for other purposes” approved July 5, 1946 (commonly referred to as the “Trademark Act of 1946”; 15 U.S.C. 1127).

(d) Additional Damages in Certain Cases.—In any case in which the court finds that a defendant proprietor of an establishment who claims as a defense that its activities were exempt under section 110(5) did not have reasonable grounds to believe that its use of a copyrighted work was exempt under such section, the plaintiff shall be entitled to, in addition to any award of damages under this section, an additional award of two times the amount of the license fee that

the proprietor of the establishment concerned should have paid the plaintiff for such use during the preceding period of up to 3 years.

### **STATEMENT OF THE CASE**

In the underlying administrative proceedings, the United States District Court for the Eastern District of Virginia ruled that the Respondents have sovereign immunity and cannot be sued. However, all the Respondents' acts of copyright infringement and fraud are inherently unofficial. Stealing data from a student and lying to a student are not part of their official business as a professor.

Several sovereign immunity cases have been heard, and the sovereign immunity rules are overturned by judges. For example, US District Judge Tanya Chutkan ruled that Donald Trump is not entitled to absolute presidential immunity against criminal charges over his efforts to overturn the 2020 presidential election. Specifically, the judge wrote, "Trump's four-year service as Commander in Chief did not bestow him the divine right of kings to evade the criminal accountability that governs his fellow citizens."

Immunity cases have been heard and seem to follow the bias of the judges. However, any immunity of any kind of any person or entity is inherently unconstitutional.

## STATEMENT OF THE FACTS

- (1) The Petitioner's Ph.D. research involved simulations with MCNP to model Pebble Bed Reactors. Petitioner, Zachary Crouch, spent between 1300 and 2600 work hours from August 2022 to December 2023 on his Ph.D. research. Other members in the research group began using Petitioner's data, without his permission, that he had coded into MCNP for their own personal gain.
- (2) To wit, Braden Goddard, took data from MCNP Pebble Bed Reactor modeling, which was intended for Petitioner's Ph.D. dissertation, and used the data for an IAEA conference in Vienna, Austria.
- (3) Braden Goddard also took more of Petitioner's codes and data from MCNP simulations to an American Nuclear Society Conference in Washington, D.C. in November 2023.
- (4) Braden Goddard also allowed an undergraduate student, Ben Impson, to make simple modifications to Petitioner's expansive MCNP files, and claim it as his own data. Ben Impson used a modified MCNP model for use at an American Nuclear Society student conference in April 2023.
- (5) Zeyun Wu instructed Petitioner to repeat his data and simulations in MCNP which did not make any sense and took a considerable amount of time. Later, Petitioner, Zachary Crouch, found out he was spending his valuable time repeating simulations so that Zeyun Wu could compare Petitioner's MCNP data with another student, Kashminder Mehta.
- (6) After Braden Goddard had all the simulations and data he needed from Petitioner, Braden Goddard fired Petitioner in December 2023. Now, this group, made up of the respondents, is using Petitioner's data, which took over 1300 work hours, for their own personal gain.



(7) Respondents, Braden Goddard and Zeyun Wu, told Petitioner, Zachary Crouch, that the data Zachary created was intended for his PhD dissertation. Respondents told Zachary this to inspire him to work long hours for over a year. However, Respondents maliciously lied to Zachary to get Zachary to work longer and harder. Respondents never had any plan to let Zachary use this data for his dissertation. Respondents' plan was to lie to Zachary about this endgame for the MCNP data, to fire Zachary after all of the data was complete, and then to take the data for themselves and other students.

### **SUMMARY OF ARGUMENT**

THE RESPONDENTS DO NOT HAVE SOVEREIGN IMMUNITY OF THIS CIVIL MATTER.

The respondents are trying to claim Sovereign Immunity for the State of Virginia in a Federal Claim. These protections are only valid in matters for laws in the State of Virginia. Furthermore, sovereign immunity is only valid for official acts. As previously explained in the Reply to the Motion to Dismiss p. 2 (Record for the United States District Court for the Eastern District of Virginia civil no. 3:24cv114), the acts of the respondents were unofficial.

## ARGUMENT

### SOVEREIGN IMMUNITY IS UNCONSTITUTIONAL.

Article VI of the Constitution of the United States of America states the following,

*“All Debts contracted and Engagements entered into, before the Adoption of this Constitution, shall be as valid against the United States under this Constitution, as under the Confederation.*

*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 Senators and Representatives before mentioned, and the Members of the several State Legislatures, and all executive and judicial Officers, both of the United States and of the several States, shall be bound by Oath or Affirmation, to support this Constitution; but no religious Test shall ever be required as a Qualification to any Office or public Trust under the United States.”*

This article means that even if there is a state law which allows for sovereign immunity, it states in the Constitution of the United States federal law is the supreme law of the land and the state law does not have precedence of laws in the Constitution of the United States of America.

The 14<sup>th</sup> Amendment of the Constitution of the United States of America states the following,

## **"Section 1**

*All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; 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.*

## **Section 2**

*Representatives shall be apportioned among the several States according to their respective numbers, counting the whole number of persons in each State, excluding Indians not taxed. But when the right to vote at any election for the choice of electors for President and Vice-President of the United States, Representatives in Congress, the Executive and Judicial officers of a State, or the members of the Legislature thereof, is denied to any of the male inhabitants of such State, being twenty-one years of age, and citizens of the United States, or in any way abridged, except for participation in rebellion, or other crime, the basis of representation therein shall be reduced in the proportion which the number of such male citizens shall bear to the whole number of male citizens twenty-one years of age in such State.*

## **Section 3**

*No person shall be a Senator or Representative in Congress, or elector of President and Vice-President, or hold any office, civil or military, under the United States, or under any State, who, having previously taken an oath, as a member of Congress, or as an officer of the United States, or as a member of any State legislature, or as an executive or judicial officer of any State, to*

*support the Constitution of the United States, shall have engaged in insurrection or rebellion against the same, or given aid or comfort to the enemies thereof. But Congress may by a vote of two-thirds of each House, remove such disability.*

#### **Section 4**

*The validity of the public debt of the United States, authorized by law, including debts incurred for payment of pensions and bounties for services in suppressing insurrection or rebellion, shall not be questioned. But neither the United States nor any State shall assume or pay any debt or obligation incurred in aid of insurrection or rebellion against the United States, or any claim for the loss or emancipation of any slave; but all such debts, obligations and claims shall be held illegal and void.*

#### **Section 5**

*The Congress shall have power to enforce, by appropriate legislation, the provisions of this article."*

This amendment means that all persons are subject to jurisdiction of any laws of the land. It also means that all persons should have the privilege to sue anyone whom they wish. Further, it states that no state shall deny a person its protection of the laws. In simpler terms, it clearly states that if all persons are subject to jurisdiction, and a state is a sum of said persons, then a state is subject to the jurisdiction of the laws of the land as well. Finally, it states that no state shall deny a person protection of the laws of the land. Claiming sovereign immunity is clearly unconstitutional as it grants persons the opportunity to escape the jurisdiction of the laws of the

land. Furthermore, it denies the Petitioner's constitutional right to allow for justice and compensation of copyright infringement acted out by the Respondents.

#### SOVEREIGN IMMUNITY IS NOT FOR UNOFFICIAL ACTS.

- 1) The Respondents proceed to dismiss the copyright infringement civil lawsuit on the basis of sovereign immunity.
- 2) Respondents' official business is Virginia Commonwealth University, for which immunity may be claimed. However, Respondents are being sued by matters outside of the university for which immunity is not absolute. Respondents stole data and used the data at conferences which were not research or teaching for which they were being paid for. Thus, this civil lawsuit does not allow for such immunities since it is well outside the scope of their duties as employees of Virginia Commonwealth University. To wit, the International Atomic Energy Agency in Vienna, Austria is not part of the Virginia Commonwealth University's educational system. Neither is the American Nuclear Society.
- 3) For example, if one of the Respondents killed a student, there is no civil and or criminal lawsuit with which they can apply an immunity because this behavior is not included with their pay. Likewise, Respondents acted selfishly, in their own interest, to steal data from a poor graduate student who did all the work and was not appropriately recognized for. According to *Stump v. Sparkman* 435 U.S. 349, 356-57 (1978), a judge will not be deprived of immunity because the action he took was in error, was done maliciously, or was in excess of his authority; rather, he will be subject to liability only when he has acted in the 'clear absence of all jurisdiction.' Clearly the Respondents, if proven guilty

of these crimes, acted in clear absence of the law and with disregard to copyright infringement laws.

- 4) Since these Respondents are not being sued for their teaching or research duties as paid by Virginia Commonwealth University and they acted independently and driven by greed and fame to steal data, the Respondents are being sued in a personal capacity.
- 5) In this Petition for Writ of Certiorari under "Constitutional and Statutory Provisions Involved," it states the following, "As used in this subsection, the term "anyone" includes any State, any instrumentality of a State, and any officer or employee of a State or instrumentality of a State acting in his or her official capacity. Any State, and any such instrumentality, officer, or employee, shall be subject to the provisions of this title in the same manner and to the same extent as any nongovernmental entity." This shows that federal copyright laws are the absolute law of anyone, non-governmental or governmental.

#### COPYRIGHT PROTECTIONS ARE NOT ONLY FOR COPYRIGHTS.

- 1) Respondents argue that this civil lawsuit be dismissed because there is not a copyright of data at the copyright office.
- 2) In this civil case, the MCNP input files were not copyrighted at the copyright office, but still the author maintains ownership of these works. For instance, if someone is writing a book and the book is stolen. If the thief of the stolen book tries to sell the book and claim ownership before the author has a chance to publish the book, then copyright laws are still in place to protect the author of the book, not the thief.

- 3) Petitioner, Zachary Crouch, will prove that he made the MCNP input files and sent them to Respondents in good faith that they would not be stolen. If necessary, Petitioner will prove that he is the author of these MCNP input files.
- 4) Respondents argues that Petitioner must prove that the data is owned by Petitioner. However, this will be proved once a court date has been set, and evidence will be compiled and sent forth to the U.S. District Court. It is absurd to ask for a dismissal before the case is even heard in this regard and the Petitioner has time to gather such evidence.
- 5) The Respondents move to dismiss the civil lawsuit because the data has not proved to be copyrighted. However, all data is subject to copyright protection, there is not a statement needed for every law about copyright infringement needed in the complaint.
- 6) The Respondents argue that the Petitioner is trying to copyright outputs of a simulation. However, this is not true. The Complaint lists MCNP input data and MCNP output data which comes directly from the MCNP input data once it was simulated in MCNP. Coding is considered artwork which is copyrightable.
- 7) The Respondents argue that the work was not stated as original. Petitioner made the MCNP input files from scratch and originality is contained in the works.

## REASONS FOR GRANTING THE PETITION

Another cause of action in this case is fraud. The sufficient facts to state a claim of fraud under Virginia law, as required by Federal Rule of Civil Procedure 9(b) are given below:

- (1) Respondents, Braden Goddard and Zeyun Wu, made a false representation by telling Petitioner, Zachary Crouch, that the data will be for his Ph.D. dissertation.
- (2) The material fact is that Petitioner, Zachary Crouch, would have never worked long hours on research if he was never going to obtain a Ph.D.
- (3) Respondents, Braden Goddard and Zeyun Wu, intentionally and knowingly constructed a false picture of achieving a Ph.D. for which the professors lied about funding and painted a fake picture that a Ph.D. can be obtained in 2 years.
- (4) Respondents, Braden Goddard and Zeyun Wu, had an intent to mislead to bribe Petitioner, Zachary Crouch, with a goal of receiving a Ph.D. to do the research.
- (5) The reliance by Petitioner, Zachary Crouch, includes not entering an employment contract with minimal salary and spending overtime work hours if there was not a straightforward path to achieve a Ph.D.
- (6) The resulting damage to the Petitioner, Zachary Crouch, includes working long hours and spending a year and a half of Petitioner's life with no return on the investment of hard work and time.



Other specifics of the false representations are given below:

- (1) The date of the false representation occurred on August 31, 2022.
- (2) The place of the false representations occurred at Virginia Commonwealth University in the Engineering East Hall, Room E3255, Richmond, Virginia.
- (3) The contents of the false representations included Respondents, Braden Goddard and Zeyun Wu, falsely informing Petitioner, Zachary Crouch, that the work put into his research will go towards his Ph.D.
- (4) The identities of the persons who made the false representation include Braden Goddard and Zeyun Wu.
- (5) The Respondents, Braden Goddard and Zeyun Wu, obtained money from a Department of Energy grant for the data Petitioner, Zachary Crouch, spent over a year producing.

## CONCLUSION

For these reasons, Zachary Crouch requests the Supreme Court of the United States grant the petition for a writ of certiorari.

Respectfully Submitted,

Zach Crouch

ZACHARY CROUCH

Petitioner

Date: May 19, 2025

## CERTIFICATE OF COMPLIANCE

In accordance with United States Supreme Court Rule 33.2(b), the total number of pages in this petition for writ of certiorari, exclusive of the Title/Cover page, Question(s) Presented, List of Parties, Related Cases, Table of Contents, Index of Appendices, Table of Authorities Sited, Opinions Below, Appendix, this Certificate of Compliance, and Proof of Service, is 19. This page count is based upon the word processing system used to prepare this petition. This submission does not exceed the page-count limit imposed by Rule 33.2(b).

A handwritten signature in cursive script, reading "Zach Crouch", is written over a horizontal line.

ZACHARY CROUCH

Petitioner