

24-7344

No. \_\_\_\_\_

IN THE  
SUPREME COURT OF THE UNITED STATES

SHETERRIA LANELLE JACKSON,  
Petitioner

vs.

STATE OF FLORIDA,  
Respondent

ON PETITION FOR WRIT OF CERTIORARI TO  
THE FIRST DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA

PETITION FOR WRIT OF CERTIORARI

Sheterra Lenelle Jackson

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QUESTION(S) PRESENTED

- I. DID THE TRIAL COURT ERR WHEN IT DENIED PETITIONER'S CLAIM THAT COUNSEL WAS INEFFECTIVE FOR FAILING TO CHALLENGE EVIDENCE PRESENTED AND FOR FAILING TO FILE A MOTION TO SUPPRESS, IN TURN, VIOLATING HER SIXTH AMENDMENT RIGHT TO EFFECTIVE ASSISTANCE OF COUNSEL AND HER FOURTEENTH AMENDMENT RIGHT TO DUE PROCESS OF LAW?
- II. WAS THE PETITIONER'S CONSTITUTIONAL RIGHT TO EFFECTIVE ASSISTANCE OF COUNSEL UNDER THE SIXTH AMENDMENT AND DUE PROCESS RIGHT UNDER THE FOURTEENTH AMENDMENT VIOLATED WHEN THE TRIAL COURT DENIED PETITIONER'S CLAIM THAT COUNSEL WAS INEFFECTIVE FOR FAILING TO ISSUE FOR A PRE-TRIAL MOTION TO DISMISS?

## 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 the petition is as follows:

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### OTHER

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 at Appendix \_\_\_\_\_ to the petition and is

[ ] reported at \_\_\_\_\_; or,  
[ ] has been designated for publication but is not yet reported to; 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[ ] is unpublished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 to; or,  
[ ] is unpublished

[ X ] For cases from State Courts:

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

[ ] reported at \_\_\_\_\_; or,  
[ ] has been designated for publication but is yet reported to; or,  
[ X ] is unpublished

The opinion of the Fourth District Court of Appeals appears at Appendix \_\_\_\_\_ to the petition and is

[ ] reported at \_\_\_\_\_; or,  
[ ] has been designated for publication but is not yet reported to; 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).

[ X ] For cases for State Courts:

The date on which the highest state court decided my case was January 27, 2025. A copy of that decision appears at Appendix E

[ ] A timely petition for rehearing was thereafter denied on the following date: January 27, 2025, and a copy of the order Court of Florida dismissed my case on January 27, 2025 stating that no motion for Rehearing or reinstatement would be entertained and a copy of the order of dismissal appears at Appendix E

[ ] 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

This jurisdiction of this court is invoked under 28 U.S.C. §1257(9).

## **CONSTITUTIONAL AND STATUTORY PROVISIONS**

United States Constitution Sixth Amendment - Effective Assistance of Counsel

United States Constitution Fourteenth Amendment - Due Process of Law

## STATEMENT OF THE CASE

On May 18, 2024<sup>1</sup>, the Petitioner was found in violation of her probation in Case Number 2018-CF-000205; Count I - Sale of a Controlled Substance, Florida Statutes §893.13(1)(A)(1) - a second degree felony (original charge). The Petitioner was alleged to have violated with the new charges enumerated in Case Numbers 02-2021-CF-11-A (Count I - Possession within Intent to Sell Amphetamine within 1000 feet of specified area, Count II - Sale of Amphetamine within 1000 fee of specified area) and Case Number 02-2021-CF-12-A (Count I- Possession with Intent to Sell; Count II - Sale of Amphetamine within 1000 feet of specified area)

On June 22, 2021, the Petitioner entered an open plea of nolo contendere in Case Numbers 2021-CF-00011 and 2021- CF-00012; all offenses first degree felonies pursuant to Florida Criminal Punishment Code with a three (3) year minimum mandatory for controlled substances within 1,000 feet of a school, pursuant to Florida Statutes, Section §893.13(1)(c)1.

On August 24, 2021, after a disposition hearing, the Petitioner's drug offender probation in Case Number 2018-CF-000205 was revoked and she was sentenced to 132 months imprisonment in the Florida Department of Corrections. On that same date, the trial court sentenced the Petitioner in Case Numbers 2021-CF-00011 and 2021-CF-00012 to 132 months pursuant to Florida Statutes §893.135.

The Petitioner did not file a direct appeal in her cause, however, a Motion to Correct Sentencing Error pursuant to Fla. R. Crim. P. 3.800(b) on September 30, 2021, as the Petitioner's judgment and sentence did not reflect all cases and counts were run concurrently

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<sup>1</sup> On May 18, 2021, a case management conference and violation of probation hearing was heard before the Honorable Phillip A. Pena, the Eighth Judicial Circuit, in and for Baker County, Florida.

with one another. The motion was granted on October 1, 2021 (See Appendix A) and an amended judgment and sentence was filed on October 14, 2021 reflecting the oral pronouncement of the Court.

On August 23, 2023, the Petitioner filed a Motion for Post Conviction Relief raising two (2) grounds for relief pertaining to ineffective assistance of counsel.

On October 2, 2023, the Petitioner's Post Conviction Motion was denied by the Honorable James M. Colaw, the Eighth Judicial Circuit, in and for Baker County, Florida (see Appendix B)

On October 27, 2023, the Petitioner filed a Notice of Appeal with the lower tribunal court, appealing their decision of denial to the First District Court of Appeal.

On October 11, 2024, the First District Court of Appeal remitted to the Petitioner an Acknowledgment of New Case (see Appendix C)

On November 26, 2024, the First District Court of Appeal per curiam affirmed the Petitioner's cause; the Petitioner subsequently filed a Motion for Rehearing and Rehearing En banc. (see Appendix D)

On January 27, 2025, the First District Court of Appeal entered an order denying the Petitioner's Motion for Rehearing and Rehearing En Banc. (see Appendix E)

## REASONS FOR GRANTING THE PETITION

"The Sixth Amendment guarantees criminal defendants the right to counsel." U.S. Const. Amend VI. The right to counsel is the right to effective assistance of counsel: King v. United States, 2020 U.S. Dist. LEXIS 228322 (11th Cir. 2020)

In Strickland v. Washington, 466 U.S. 668, 104 S. Ct. 2052 (1984), the United States Supreme Court sets forth a two-pronged test for analyzing ineffective assistance of counsel claims. According to Strickland:

"...First, the defendant must show that counsel's performance was now deficient. This requires showing that counsel made errors so serious that counsel was not functioning as the counsel guaranteed the defendant by the Sixth Amendment. Second, the defendant must show that the deficient performance prejudiced the defense. This requires showing that counsel's errors were so serious as to deprive the defendant of a fair trial, a trial whose result is reliable." (Also see United States v. Zambrano, 2022 U.S. Dist. LEXIS 208965 (11th Cir. 2022)

Moreover, Perry v. United States, 2021 U.S. Dist. LEXIS 247491 (11th Cir. 2021), outlines the protections of the due process clause pursuant to the Fourteenth Amendment of the U.S. Constitution.

"The Due Process Clause provides the guarantee of fair procedure related to a constitutionally-protected interest. Due process guarantees that a government acts cannot deprive a person of a constitutionally protected interest in life, liberty or property without adequate procedural protections."

In the instant case, the Petitioner poses two (2) questions to this Honorable Court regarding cognizable claims of ineffective assistance of counsel, specific deprivation thereof and constitutional violations rising from deprivation of due process of law guaranteed by Federal and State provisions, where by, in the Florida State Court's denial of relief, in regards to the follow claims that are due to be set forth, created a manifest injustice and undeterred

confidence in an outcome that was reliable; requiring reversal and an evidentiary hearing to address the merits of her claims. The following is averred:

I. Did the trial court err when it denied Petitioner's claim that counsel was ineffective for failing to challenge evidence presented and for failing to challenge evidence presented and for failing to file a Motion to Suppress, int urn, violating her Sixth Amendment right to effective assistance of counsel and her Fourteenth Amendment to Due Process of Law?

Florida State law provides in Spence v. State, 889 So. 2d 868, 870 (Fla. 2d DCA 2004) that:

"An allegation that trial counsel provided ineffective assistance by failing to file a Motion to Suppress is a legally sufficient claim, which is not waived by entry of a plea."

In the case at bar, at violation of probation hearing and case management conference, before the Honorable Phillip A. Pena, Eighth Judicial Circuit, in and for Baker County, Florida, the Respondent proceeded with a plethora of witnesses, (including Mr. Mann) referred to specific evidence. Primarily, Mr. Mann referred to specific video and audio evidence that was played in open court on May 18, 2021. This video footage was from the cell phone used by Mr. Mann provided by the Baker County Sheriff's Office; it was dark, grainy and difficult to decipher and follow. This evidence was integral in the State obtaining a conviction and ultimately assisted the sentencing judge in fashioning a sentence in response to the Petitioner's open plea on June 22, 2021. This evidence was also available to defense counsel, Douglas E. Massey, well in advance, before the VOP hearing and case management conference, before the Petitioner entered her nolo contendere plea and before the Petitioner's judgment and sentence were entered by the Court.

In open court, specific details about the quality of the video and audio were revealed by

Richard Mann's testimony. Again, it was revealed that the equipment Mr. Mann used was provided by Baker County Sheriff's Office [T-pg.60 (lines 22-25), pg. 61 (lines 1-4); pg. 65 (lines 12-17) - VOP Hearing and Case Management Conference - May 18, 2021].

The video itself was suppose to show Mr. Mann's interaction with the Petitioner and serve as corroborating evidence that drug transactions occurred on two (2) different occasions as a result of two (2) controlled buys, between the Petitioner and Mr. Mann. However, that is not what State's exhibit "M" showed and witness and confidential informant Richard Mann admitted to this in open Court, while under Direct Examination of Lorelie P. Brannon, Assistant State Attorney.

[T-pg. 66 (lines 22-25); pg. 67 (lines 1-6, 20-21) VOP Hearing and Case Management Conference - May 18, 2021.]

"Q: [Ms. Brannon] So you would agree, though, that as far as what is actually recorded in the video and audio-did it appear to capture what you had actually done for this controlled buy?"

A: [Mr. Mann] Yeah, you can't see no hand to hand but you can actually hear me saying, "Where's the dope at?" And she says, "It's right there."

Q: Okay. And that particular part that you're...that you're talking about, the video is dark on that part; is that right?

A: Yes, Ma'am.

Q: ...purchasing the drugs, although you said that you can't actually see the hand-to-hand --

After this video evidence was referenced by the State and requested to move into evidence as State's exhibit "M", Mr. Massey, defense counsel, did not object. [T-pg. 68 (line 2)]

The State went on to show still photographs obtained from the video recording, marked

as exhibit "N" through "R" [T-pgs. 68-71] It should be duly noted that in both cases, in both videos, there is no evidence of hand-to-hand transactions, which is an essential element in prong beyond a reasonable doubt that a Possession with Intent to Sell Amphetamine and Sale of Amphetamine actually occurred.

Florida Law pursuant to Florida Statues §893.13(1) outlines that there are two ways to exercise control types of possession in order to prove the crime of possession occurred: actual possession and constructive possession:

"Actual possession means the person is aware of the presence of the substance and:

- a. The substance is in the hand of or on the person or,
- b. The substance is in a container in the hand of or on the person, or
- c. The substance is so close as to be within ready reach and is under the control of the person.

Constructive possession means the person is aware of the presence of the substance, the substance is in a place over which the person has control, and the person has the ability to control the substance."

(quoting In Re: Standard Jury Instructions in Criminal Cases - Supreme Court of Florida, 191 So. 3d 291; 2016 Fla. LEXIS 711; 41 Fla. L. Weekly S139 - April 7, 2016)

The Florida Supreme Court further purports that:

"Mere proximity to a substance is not sufficient to establish the power and intention to control over that substance when the substance is in a place that the person does not control."

In the case at bar, since the essential elements were not rest as to possession, either actual or constructive, and the video recording, audio and still photos did not prove beyond a reasonable doubt that the Petitioner committed the charged offenses, it was defense counsel's responsibility to have reviewed the information this video recording and still photos revealed and therefore file a Motion to Suppress these videos and all evidence obtained as a result of

these videos. Defense counsel could have provided specific and definite detail as a basis to request relief in the form of suppression of all information obtained from these videos as all evidence proved insufficient to prove the Petitioner guilty of said offense.

In United States v. Senese, 2018 U.S. Dist. LEXIS 107660 (11th Cir. 2018), the Eleventh Circuit held that:

"A Motion to Suppress must in every critical respect be sufficiently definite, specific, detailed and non-conjectural to enable the court to conclude that a substantial claim is presented. In short, the motion must allege facts which, if proven, would provide a basis for relief."

The Florida Supreme Court held in Bush v. State, 295 So. 3d 179 (Fla. 2000) that:

"The standard of review historically applied to a determination of the legal sufficiency of evidence to support a criminal conviction, at least where there is some direct evidence, is simply whether the State presented competent, substantial evidence to support the verdict."

The Florida Supreme Court states that the trier of fact, is rationality, is vetted with the responsibility to view the evidence through the lenses of finding whether that evidence proves the existence of the elements of the crime beyond a reasonable doubt, the sufficiency of the evidence is to be analyzed.

Defense counsel failed to compel the court by way of a Motion to Suppress, to analyze the sufficiency of the evidence in view of the existence of essential elements relative to the offenses charged. Counsel's performance was deficient and his failure prejudiced the Petitioner, depriving her of an outcome that was reliable; he was definitely not functioning as the counsel guaranteed the Petitioner by the Sixth Amendment.

Had counsel filed a Motion to Suppress the video recordings and the still photos derived from these recordings. The Petitioner would not have entered an open plea of nolo contendere

and there is a reasonable probability that the Petitioner would not have been convicted of the crime charged; exponentially changing the outcome of her proceedings. The Petitioner's sentence and judgment should be reversed and vacated.

II. Was the Petitioner's constitutional right to effective assistance of counsel under the Sixth Amendment and Due Process Right under the Fourteenth Amendment violated when the trial court denied Petitioner's claim that counsel was ineffective for failing to move for pretrial motion to dismiss?

In the State of Florida, a challenge to the sufficiency of evidence to support conviction is a question of law, reviewable *de novo* by State Appellate Courts. (see State v. Sims, 110 So. 3d 113, 115-116 (Fla. 1st DCA 2013)) The test for sufficiency is whether the State produced competent, substantial evidence to support the verdict. Bush, *supra*. "Substantial evidence" is "such relevant evidence as a reasonable mind would accept as adequate to support a conclusion." Evidence is "competent" if it is "sufficiently relevant and material." (citing DeGroot v. Sheffield, 95 So. 2d 912, 916 (Fla. 1957))

In Bush, the Florida Supreme Court abandoned a different standard of review for cases in which the evidence of guilty is wholly circumstantial. The Court did not identify any cases in which convictions reversed under the circumstantial evidence standard would have been affirmed under the "competent, substantial evidence" test. Nor did the Court suggest that the elimination of the circumstantial evidence test would yield different outcomes in the future. In concluding that the existence of both the circumstantial evidence and competent, substantial evidence tests was "confusing and incorrect", it adopted the analysis of then Judge Lawson in Knight v. State, 107 So. 3d 449 (Fla. 5th DCA 2013). Judge Lawson wrote:

"We strongly suspect that what appellate judges really do in circumstantial sufficiency of the evidence cases (as in all sufficiency of the evidence cases) is

look at the totality of the evidence presented and, giving full play to the right of the jury to determine credibility, weigh the evidence and draw justifiable inferences of fact, ask whether a reasonable mind might fairly conclude guilt beyond a reasonable doubt. If, after a careful review and evaluation of the evidence using this standard, the judge determines that a rational fact-finder could not fairly conclude guilt beyond a reasonable doubt, the judge then shifts back to the language of the mandated standard to announce that the State did not present evidence inconsistent with a reasonable hypothesis of innocence. Conversely, if the judge determines that a rational fact-finder could fairly conclude guilt beyond a reasonable doubt considering all of the evidence, the judge is forced to return to the mandated standard to announce that the defendant's hypothesis of innocence is either not reasonable or a question for the jury. Either way, the special standard does not aid the appellate analysis. Although we use the words, a necessary, it is not the way we do (or should) think about the issue."

*Id.* at 459-460 (internal quotations, citations, and parentheticals omitted).

Under either test, "[c]ircumstances that create nothing more than a strong suspicion that the defendant committed the crime are not sufficient to support a conviction." Cox v. State, 55 So. 2d 352, 353 (Fla. 1999). Because the State's courts used the circumstantial evidence in reviewing convictions for decades, the precedent that follows contains discussion of whether the evidence was inconsistent with a reasonable hypothesis of innocence. In most instances, this was merely another way of saying that the State did not produce legally sufficient evidence that a defendant committed the crime. That precedent applies here-in the instant case.

In the case at bar, the Petitioner argues that the alleged crime committed did not meet the elements of the statute, Fla. Stat. §893.13, and that defense counsel was ineffective for allowing her to open plea to the bench for a crime that she did not commit. The Petitioner argues that there was not sufficient factual basis to convict her of the said crime. The State would have had to present evidence establishing the factual basis, and if not, the charges/Information would have to be dismissed. The Petitioner argues that counsel's failure to file a Motion to Dismiss

exhibited deficient performance that severely prejudiced the Petitioner and deprived her of an outcome that was reliable.

Testimony during the Petitioner's VOP Hearing and Case Management Conference held on May 18, 2021 was proffered from Richard Mann, confidential informant, under cross examination by defense counsel Massey as to the quality and veracity of this video recording in both controlled buys. Defense got Mr. Mann to admit that there were some parts of the video that went dark at several times and Mr. Mann alluded that it was purposely done by him because, "...I'm not trying to jeopardize my safety and just be recording." [T-pg. 96 (lines 6-70] Again, in Mr. Massey's cross examination of Mr. Massey, he admits that there was no hand-to-hand transaction ever recorded, between himself and the Petitioner [T-pg. 97 (lines 8-14)] and further, there were other voices that could be heard on video and audio, indicating that there were other people present at the Petitioner's residence while this control buy was transpiring. Defense counsel went on to question the quality of the video and the various discrepancies with his testimony, further concluding with the following [T-pg.99 (lines 9-12) - VOP Hearing and Case Management Conference - May 18, 2021]

"Q: [Mr. Massey] And in that second video as well, there's not a recording of a hand-to-hand transaction between you and Ms. Jackson, is there? "

A: [Mr. Mann] "No."

As this was the VOP Hearing and Case Management Conference and the Petitioner had not yet been adjudicated guilty nor sentenced in Case Numbers 02-2021-CF-11-A and 02-2021-CF-12-A, it was counsel's express responsibility to use the information he proffered from Mr. Mann and file a pre-trial Motion to Dismiss pursuant to Fla. R. Crim. P. 3.190(c)(4) as there

were no material disputed facts and the undisputed facts do not establish a prima facie case of guilt against the Petitioner. The court may, at any time, entertain a Motion to Dismiss on this ground. Wilson v. State, 744 So. 2d 1237 (Fla. 1st DCA 1999) (Reversed) ("When a defendant moves to dismiss an information pursuant to Fla. R. Crim. P. 3.190(c)(4), the Defendant has the burden to allege undisputed material facts and show that the undisputed facts do not establish a prima facie case.") Also, see Dixon v. State, 112 So. 3d 721 (Fla. 2d DCA 2013)

Counsel's performance fell below a reasonable objective standard, depriving the Petitioner of a proceeding whose outcome was reliable, creating a manifest injustice and creating prejudice that reached down to the very validity of the proceedings.

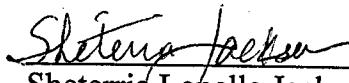
Counsel was not acting as counsel guaranteed by the Sixth Amendment. Moreover, counsel disregarded Petitioner's due process right to challenge her Information via a Motion to Dismiss; an appropriate pre-trial motion alleging claims that undisputed facts existed that did not establish a prima facie case to convict her.

Had counsel filed a Motion to Dismiss her charges/Information, there is a reasonable probability that the Petitioner would not have entered a nolo contendere plea, but proceeded to trial or had all charges against her dismissed, and the outcome of her proceedings would have been different. The Petitioner deserves relief on her claim, where a reversal is warranted.

### CONCLUSION

The Petition for Writ of Certiorari should be granted.

Respectfully Submitted,

  
Shetteria Lanelle Jackson, DC# G21095  
Date: April 24, 2023