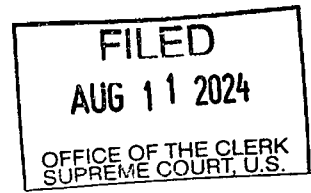


ORIGINAL

No. 24-747



In the
Supreme Court of the United States

ERIK COOPER,

Petitioner,

v.

STATE OF TENNESSEE, ET AL.,

Respondents.

ON PETITION FOR WRIT OF CERTIORARI
TO THE SUPREME COURT OF TENNESSEE

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED

1. Whether the public can maintain trust or confidence in a state supreme court if the court ignores its own rules and its agency's own policies and rules governing the investigation of disciplinary complaints.

2. Whether a state court can ignore public reports of its agency's violations of court rules and the agency's policies and rules during the administration of disciplinary complaints.

PARTIES TO THE PROCEEDING

Parties to this proceeding are: Erik Cooper (hereinafter "Petitioner"), State of Tennessee, the Supreme Court of Tennessee, and Board of Professional Responsibility of the Supreme Court of Tennessee (hereinafter "Respondents").

RELATED PROCEEDINGS

The Supreme Court of Tennessee:

*In Re: Disciplinary Complaint Against
James Bruce Dunn, District Attorney General
for the Fourth Judicial District of Tennessee*
(Aug. 7, 2023, introduction to Petitioner
of Special Disciplinary Counsel J. Robert
Carter, Jr.), No. M2023-01000-SC-BAR-BP

Board of Professional Responsibility
of the Supreme Court of Tennessee:

*In Re: Disciplinary Complaint Against
James Bruce Dunn, District Attorney General
for the Fourth Judicial District of Tennessee*
(Aug. 2, 2021), Complaint No. 68227c-1

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PETITION FOR WRIT OF CERTIORARI

Erik Cooper petitions the Supreme Court of the United States for a writ of certiorari to review the order of the Supreme Court of Tennessee.

OPINIONS BELOW

The Supreme Court of Tennessee's order is unreported and under seal. The order is included in the Supplemental Appendix under seal, page SSA-1.

JURISDICTION

The Supreme Court of Tennessee issued its decision in the matter of *In Re: Disciplinary Complaint Against James Bruce Dunn, District Attorney General for the Fourth Judicial District of Tennessee* on May 15, 2024.

The United States Supreme Court will have jurisdiction over this matter because 28 U.S.C. § 1257(a) gives this Honorable Court jurisdiction over an appeal of a final judgment rendered by the highest court of the state where any title, right, privilege, or immunity is specially set up or claimed under the Constitution.

CONSTITUTIONAL, STATUTORY, AND RULE PROVISIONS INVOLVED

This case involves Rule 8 and Rule 9 of the Supreme Court of Tennessee. Rule 8 pertains to the Rules of Professional Conduct governing attorney conduct in Tennessee. Rule 9 pertains to disciplinary enforcement by the Board of Professional Responsibility of the Supreme Court of Tennessee.

INTRODUCTION

This petition presents two questions of foundational importance to maintain public trust and confidence in the state courts and the administration of disciplinary complaints pertaining to individuals licensed by state courts.

In this action, an attorney licensed to practice law by the state court was accused of violating the court's rules of professional conduct by, among other violations alleged, providing grand jurors with that attorney's own probable cause opinions of cases presented and poisoning the independent determinations of those grand juries.

In Tennessee, the Board of Professional Responsibility of the Supreme Court of Tennessee ("Board") conducts investigations of attorney misconduct alleged. Investigations are governed by the Court's Rules and by the Board's policies and rules. Members of the public are encouraged to report alleged misconduct to the Board for investigation. If the Board's investigation substantiates conduct alleged in a complaint, disciplinary actions may follow upon the Board's referral of the matter to the Supreme Court of Tennessee ("Court").

In this case, the Board violated its own rules to affect the outcome of its investigation of a Board member, and the Court, through its own inactions, condoned the Board's violations of Court Rules and Board policies and rules governing such investigations.

If allowed to stand, the Court and its Board will have violated its own Court Rules, its Board's policies and rules, and permitted an attorney member to avoid disciplinary actions, including disbarment. Certiorari is warranted in this case.

STATEMENT OF THE CASE

A. Factual Background

This case involves erosion of public trust and confidence in the investigation and administration of disciplinary complaints reported to a state supreme court and its agency.

James Bruce Dunn ("Mr. Dunn") is an attorney licensed to practice law by the Court. Mr. Dunn is the elected district attorney general for the fourth judicial district of Tennessee. Mr. Dunn has practiced law with the district attorney general's office for more than 34 years.

Petitioner Erik Cooper is a resident of Sevier County, Tennessee, located within the fourth judicial district. Petitioner appeared before grand juries in Sevier County as permitted under Tennessee Code Annotated § 40-12-104, which permits a private individual to appear before a grand jury to offer evidence and testimony of triable and indictable offenses occurring within the county. Petitioner is employed as a risk management and litigation consultant and made a number of appearances before grand juries. During these appearances, Petitioner witnessed Mr. Dunn and his assistant district attorney generals provide grand jurors with their own probable cause opinions on matters Petitioner was presenting to grand juries.

To reach his own probable cause opinions, Mr. Dunn relied upon an unlawful written application he required individuals to submit before appearing in front of a grand jury. Further, Mr. Dunn imposed an unlawful deadline for submission of his application in sufficient time to afford Mr. Dunn and his staff opportunity to conduct their own investigation of the applicant's allegations and to formulate Mr. Dunn's own probable cause opinion based thereupon. Additionally, Mr. Dunn required applicants provide him with a copy of their government-issued photo identification or be denied their application to appear before a grand jury. Notwithstanding each of these unlawful impositions, Mr. Dunn demanded Petitioner sign a Waiver of Constitutional Rights or be denied Petitioner's application to appear before a grand jury. Mr. Dunn maintained no legal authority to impose such requirements in violation of Tenn. Code Ann. § 40-12-104. Petitioner successfully disarmed Mr. Dunn and his district attorney general's office of these tools weaponized to obstruct justice during grand jury proceedings.¹

Petitioner filed a formal complaint notifying the Board of the foregoing acts and other allegations relating to Mr. Dunn's conduct as an attorney licensed by the Court to practice law ("Dunn Complaint").² Petitioner filed the Dunn Complaint

1 *In Re Sevier County Grand Jury / Erik Cooper, Petitioner to Appear Before Sevier County Grand Jury*, Sevier County (Tennessee) Circuit Court, case nos. 2023-PJ-04-03, 2023-PJ-07-13, and 2023-PJ-09-08.

on August 2, 2021 and supplemented it thereafter with additional evidence and records. Petitioner filed disciplinary complaints relating to acts pertaining to other attorneys of Mr. Dunn's district attorney general's office whose conduct the Petitioner alleged violated the Court's Rules.³

In 2022, following submission of the Dunn Complaint to the Board, the Court appointed Mr. Dunn to serve as a member of the Board's board of directors for a term beginning January 1, 2022 and ending December 31, 2024. Mr. Dunn began serving his term on January 1, 2022 and continues serving as a member today.

On May 3, 2023, Petitioner supplemented the Dunn Complaint with additional evidence and information relating to the Board's investigation. Mr. Dunn continued serving as a member of the board of directors at the time of this submission. Sometime thereafter, the Board forwarded Petitioner's complaint to the Court for further investigation and disposition. This referral occurred nearly 16-months after Mr. Dunn had already been seated as a board member and violated Court Rule 9, § 16.2(a).

² Board complaint number 68227c-1.

³ Board complaint numbers 73405c-1 and 68056c-1.

B. Board Proceedings

On August 7, 2023, Petitioner received e-mail correspondence transmitted to him by Honorable J. Robert Carter Jr. ("SDC Carter") introducing himself as the Court's appointed special disciplinary counsel for investigation of the Dunn Complaint.⁴ According to the Court's Order attached therewith, Justice Jeffrey S. Bivins ("Justice Bivins") was designated as the Reviewing Justice of the state's Supreme Court pursuant to Court Rule 9, § 16.3(b).

Petitioner forwarded to SDC Carter additional evidence and records in support of allegations he asserted in the Dunn Complaint. SDC Carter concluded his investigation in March 2024.

On March 26, 2024, SDC Carter sent letter correspondence to the Petitioner providing notice of the conclusion and findings of SDC Carter's investigation, and providing Petitioner with notice of the recommended disposition of the matter pursuant to Court Rule 9, § 16.3(b)(1) ("Notice"). SDC Carter recommended dismissal of the Dunn Complaint and received approval for his recommendation from Justice Bivins. The Notice provided Petitioner with information pertaining to his appeal rights. Appeals of dispositions for matters pertaining to attorney board members were referred directly to the state Supreme Court.

⁴ SDC Carter attached to his August 7, 2023 e-mail introduction the Court's Order, assigned case number M2023-01000-SC-BAR-BP. The Order bears no entering or filing date.

C. Court Proceedings

On April 28, 2024, Petitioner filed his appeal of SDC Carter's recommended disposition of the Dunn Complaint. Petitioner's appeal included reference to two civil lawsuits Petitioner filed both before and after SDC Carter's Notice.⁵ Petitioner referenced allegations made in each lawsuit and SDC Carter's statements indicating his confusion in his role as special disciplinary counsel assigned to investigate the allegations asserted in the Dunn Complaint. Additionally, Petitioner cited language used in the Notice, particularly, SDC Carter's confirmation of a lower state court's rulings pertaining to Mr. Dunn's unlawful conduct committed during grand jury proceedings, including the court ceasing use of Mr. Dunn's Waiver of Constitutional Rights, ceasing use of Mr. Dunn's written application, ceasing imposition of Mr. Dunn's unlawful deadline imposed upon applicants seeking to appear before a grand jury under Tenn. Code Ann. § 40-12-104, and ceasing Mr. Dunn's practice of unlawfully scheduling an applicant's appearance before a grand jury. Mr. Dunn's criminal conduct of poisoning grand juries with Mr. Dunn's own probable cause opinions -- clearly in violation of the Court's Rule 8 -- was also cited in Petitioner's appeal. Petitioner disputed the narrowed findings indicated in SDC Carter's Notice, and cited evidence and records not referenced in the Notice or any of the

⁵ In matters styled *Erik Cooper v. James Bruce Dunn, et al.*, United States District Court for the Eastern District of Tennessee, case numbers 3:24-CV-00134 and 3:24-CV-00188, respectively.

Board's findings upon conclusion of its investigation of the Dunn Complaint. Finally, Petitioner cited the findings of SDC Carter suggesting the lower state court's remedies of Mr. Dunn's criminal acts during grand jury proceedings resolved the Board's need to intervene further or to discipline its own board member, Mr. Dunn. Petitioner referenced language used in Mr. Dunn's response to the Dunn Complaint as evidence of his own probable cause determinations and poisoning of grand juries:

The thing that's in front of the Court today is a hodgepodge of 2016 events that occurred in 2016, 2017, wherein a person or persons could have their reputations, could have their jobs, or their standing in the community having been indicted of something they were not probable cause to believe that it occurred.

Clearly, Mr. Dunn's probable cause opinion of the merits of an applicant's appearance before a grand jury -- as Mr. Dunn derived from his written application and his investigation of its contents -- was irrelevant to the duties of grand jurors during grand jury proceedings.

In his own words, Mr. Dunn provided the state courts, the Board, and SDC Carter with the cause for his obstruction of justice and poisoning of grand jurors during grand jury proceedings -- because *Mr. Dunn* determined there was "[no] probable cause to believe" that a crime had occurred.⁶

Petitioner requested the Court exercise its authority granted under Rule 9 § 16.3(b)(1) to "direct the matter be investigated further." Petitioner asked the Court to rely, in part, upon evolving evidence resulting from ongoing civil litigation in federal court to offer the Court additional support for allegations made in the Dunn Complaint. Petitioner asked the Court to consider additional evidence and records arising from ongoing state court civil actions yielding arguments made directly from Mr. Dunn himself in opposition to petitions the Petitioner had filed to further disarm Mr. Dunn of his criminal tools.

Notwithstanding the Petitioner's request encouraging the Court to exercise its authority to direct the matter be investigated further, the Court denied Petitioner's appeal, creating an appearance of impropriety by the Court's own actions to refuse evidence in-hand and other evidence produced from state and federal court records, including orders, pleadings, arguments, court transcripts and other items in support of the Dunn Complaint. Such evidence was not considered during SDC Carter's investigation because SDC Carter concluded his investigation without having received such records made available to him.

6 The crimes, as referenced by Mr. Dunn, involve five counts of criminally negligent homicide alleged against prominent Sevier County leaders Mr. Dunn sought to protect from blame and criminal prosecution -- his cause for finding "[no] probable cause" and poisoning the independent findings of grand juries.

Evidence ignored included, among other items, Mr. Dunn's admission of his acts of misconduct and crimes committed during grand jury proceedings.

Additionally, the Court offered no response to Petitioner's complaint for its Board's failure to comply with Rule 9, § 16.2(a) requiring timely transmittal of the Dunn Complaint by the Board to the Court's Chief Justice. The Board's referral 16-months late and only after Mr. Dunn began his service as a board member undermines the Court's integrity and compromises public trust and confidence in the Court to uphold its own Rules governing the conduct of attorneys licensed for professional practice by the Court.

REASONS FOR GRANTING THE PETITION

This Honorable Court's intervention in this matter is necessary to restore public trust and confidence in the integrity of the Supreme Court of Tennessee and its Board. The Court ignored its own Rules and its Board's own policies and rules to achieve an intended outcome for the Dunn Complaint. Disciplinary actions involving a board member appointed by Justices of the Court is itself unprecedented in Tennessee's history.

In this action, the Court allowed its Board to ignore and abandon the Dunn Complaint for nearly 16-months before the Board, inexplicably, referred the Dunn Complaint to the Chief Justice of the Court. Rule 9, § 16.3 provides for "[t]he investigation of complaints submitted under Section 16.2 against attorney members of the Board[.]" Rule 9, § 16.3(a) provides, "[c]omplaints against attorney members of the Board alleging violations of the Rules of

Professional Conduct shall be submitted directly to the Chief Justice of the Court." The Board's referral of the Dunn Complaint to the Court in May 2024 was 16-months late and required the Court's review.

The Court and its Board have demonstrated a pattern of violating the Court's Rules and the Board's policies and rules governing investigation and administration of disciplinary complaints to achieve a desired outcome -- dismissal.

Consider, for example, during a Board investigation of Mr. Dunn's subordinate employee, Ronald Crockett Newcomb,⁷ the Board requested, then altogether abandoned, its request for an interview pertaining to the Petitioner's complaint, evidence and information routinely transmitted to the Board in support of its investigation as such information became available to the Petitioner in ongoing civil proceedings. Despite knowledge of evidence and records forthcoming, the Board prematurely closed its investigation and again unsubstantiated the Petitioner's complaint to achieve the Board's desired outcome -- dismissal. Additionally, the Board's failure to comply with its rules pertaining to communications with the complainant altogether denied Petitioner's appeal rights afforded under Rule 9, §15.1(f).

7 Board complaint number 73405c-1.

Consider also, for example, in another disciplinary complaint matter involving attorney Richard Alexander Johnson ("Mr. Alexander"),⁸ the Board failed to comply with Rule 9, §15.1(a): "The Board shall provide the respondent attorney with a complete copy of the original complaint and of any additional or supplemental written submissions by the complainant." In Mr. Alexander's June 2024 application for appointment as a state court judge, he affirmed:

I never received a copy of the complaint filed against me and I do not know what was alleged. Therefore, I never made a formal response. Rather, I learned about the complaint when I received a letter from the Board of Professional Responsibility stating that the complaint was dismissed.

By Mr. Alexander's foregoing affirmation, the Board violated the Petitioner's and Mr. Alexander's rights afforded by the Court's Rules governing investigation and disposition of complaints.

No regulatory agency investigates the Board. The Board reports exclusively to the Court, and the Court chooses to investigate or to ignore complaints lodged against its Board by members of the public. Unless this Honorable Court grants the petition to address conduct of the Supreme Court of Tennessee and its Board, the acts of ignoring Court Rules

8 Board complaint number 71626c-1.

and Board policies and rules to achieve intended outcomes of its investigations will repeat again and again, and public confidence and trust in the Court or its Board will continue to dissolve.

THE DECISION BELOW RESULTED FROM THE COURT'S VIOLATIONS

Rules governing the investigation and administration of complaints lodged against attorneys licensed by the Court establish the parameters by which all parties to a complaint -- the complainant, the respondent, the Board, and the Court -- can rely upon for effective and efficient administration of the investigation and resolution process. Here, the Court violated those Rules, and the decision below was compromised by the Court's own violations.

Despite the Board's obligation to refer all complaints involving attorney members of the Board's board of directors to the Chief Justice of the Court, the Board failed to timely do so while Mr. Dunn continued serving his community as an attorney and serving the Court as its board member. Had the Board referred the Dunn Complaint to the Court timely and had the investigation substantiated the complaint, Mr. Dunn would have continued practicing law and serving his community as its district attorney general without receiving any disciplinary action for nearly 16-months. The Board's failure allowed the Dunn Complaint to pass substantial time without investigation or disposition. The Court's refusal to counsel its own Board for violating the Court's own Rule undermines the Court's integrity, public trust and confidence.

Equally, the decision to unsubstantiate the Ronald Crockett Newcomb complaint also resulted from the failure of the Board -- under the Court's supervision -- to perform an efficient investigation of the complaint including contact with complainant, receipt and review of additional evidence and records relevant to the Board's investigation of the matter, and notice to complainant of the disposition. Also, in the Richard Alexander Johnson complaint matter, the Board's failure to timely transmit "a complete copy of the original complaint and of any additional or supplemental written submissions by the complainant" offers this Court further evidence of the administrative failures of the Board to adhere to the Court's Rules and the Board's own policies and rules, and the failure of the Court to supervise and manage the conduct of its Board.

THE DECISION BELOW UNDERMINES PUBLIC TRUST AND CONFIDENCE

Public trust and confidence in the Court and its Board is compromised by the repeated violations of the Court's Rules and the Board's policies and rules administering Court Rules. Public trust is a paramount component of the duties entrusted to the Court, and without trust, the Court's integrity is questioned and foundation for confidence eroded.

In the administration of the Dunn Complaint, the Court had cause to violate its own Rules. Any discipline of a board member appointed by the Justices themselves who selected that board member would create public criticism of the Court and questioning of its considerations of candidates and their qualifications for such appointments.

Rather than conduct a fair and transparent investigation of the Dunn Complaint -- with strict adherence to its own Rules to avoid the appearance of impropriety -- the Court elected to ignore evidence and records disclosed during its investigation while state court matters progressed, unsubstantiated Petitioner's complaint against its board member, and denied Petitioner's appeal. This conduct simply repeated the Court's and its Board's earlier acts of ignoring duties owed the Petitioner in the administration of the Ronald Crockett Newcomb complaint, and, duties the Court owed the Petitioner and respondent in the Richard Alexander Johnson disciplinary complaint matters.

The public can only maintain trust and confidence in the judiciary, including its agencies entrusted to administer the Court's duties owed the public, when the Court and its agencies adhere to Court Rules governing such duties.

THE QUESTIONS PRESENTED WARRANT REVIEW IN THIS CASE

Public trust and confidence in the judiciary must be maintained. Questions presented in this case warrant review because, absent this Court's intervention, no other judicial, regulatory, or administrative agency of government has power or authority to oversee conduct of the Supreme Court of Tennessee or its Board when the Court or its Board violate Court Rules and Board policies and rules established as guiding principles for fair and transparent administration of disciplinary complaints involving its attorney members.

When a state court is permitted to ignore its rules governing investigations and administration of disciplinary complaints, the public has no duty owed the Court to trust any of the Court's decisions or actions taken to reach those decisions. Our judicial system fails in the absence of public trust. Equally, if a state court can ignore reports of violations of Court Rules committed by its own agency governing the administration of disciplinary actions, then the Court and its agency remain unbalanced without any oversight. These questions warrant the Court's review to restore public trust and confidence.

CONCLUSION

Based upon the documented failures of the Supreme Court of Tennessee to abide by its own Rules governing the administration of complaints pertaining to an attorney member of the Board, documented failures of the Board to abide by Court Rules and its own policies and rules governing the investigation, administration and disposition of complaints, and the importance of public trust and confidence in the Court and its Board to uphold principles of integrity in the governance of individuals the Court licenses and regulates, this Petition for Writ of Certiorari should be granted.

Respectfully submitted:

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