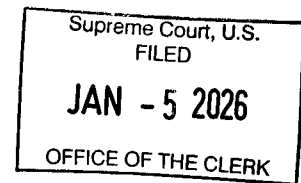


IN THE

SUPREME COURT OF THE UNITED STATES

25 - 7572

ORIGINAL



HADAROU SARE,

Petitioner,

v.

**CENTRAL COLLECTION UNIT; OFFICE OF THE ATTORNEY GENERAL OF
MARYLAND; TAX REFUND INTERCEPTION PROGRAM; UNIVERSITY OF
MARYLAND COLLEGE PARK,**

Respondents.

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

PETITION FOR A WRIT OF CERTIORARI

Hadarou Sare

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QUESTIONS PRESENTED (Rule 14.1(a))

1. Whether a public university and state collection agencies violate the Fourteenth Amendment when they terminate a fellowship and impose state debt without providing meaningful pre-deprivation process.
2. Whether the Eleventh Amendment bars prospective declaratory and injunctive relief under *Ex parte Young* where state officials are engaged in ongoing constitutional violations.
3. Whether a federal court may dismiss a pro se plaintiff's due-process claims at the Rule 12(b)(6) stage by resolving disputed factual issues against the plaintiff without discovery.
4. Whether summary affirmance without addressing controlling Supreme Court precedent conflicts with this Court's Due Process jurisprudence under *Mathews v. Eldridge*, *Goss v. Lopez*, and *Ex parte Young*.

LIST OF PARTIES (Rule 12.6)

All parties to the proceeding in the court whose judgment is sought to be reviewed are:

Petitioner:

Hadarou Sare

Respondents:

Central Collection Unit (CCU)

Office of the Attorney General of Maryland

Tax Refund Interception Program (TRIP)

University of Maryland College Park

OPINIONS BELOW

The opinion of the United States Court of Appeals for the Fourth Circuit was entered on December 22, 2025 and is reproduced in the Appendix at App. 1a.

The opinion of the United States District Court for the District of Maryland is reproduced at App. 1b.

JURISDICTION

The judgment of the Court of Appeals was entered on December 22, 2025. This Court has jurisdiction under 28 U.S.C. § 1254(1). This petition is timely under Supreme Court Rule 13.

CONSTITUTIONAL PROVISION INVOLVED

U.S. Const. amend. XIV, § 1 (Due Process Clause).

STATEMENT OF THE CASE

This case concerns the termination of Petitioner's doctoral fellowship at a public university and the subsequent conversion of fellowship funds into alleged state debt without meaningful pre-deprivation process.

Petitioner was expelled from the University of Maryland College Park based on disputed allegations. Immediately thereafter:

- His fellowship was terminated.
- Funds previously disbursed were recharacterized as “debt.”
- The alleged debt was referred to the Central Collection Unit.

Petitioner alleges he was not provided:

- A meaningful pre-deprivation hearing
- An impartial decision-maker
- The opportunity to confront adverse witnesses
- Any process prior to state collection activity

The district court dismissed the complaint at the Rule 12(b)(6) stage. The Fourth Circuit summarily affirmed.

REASONS FOR GRANTING THE PETITION

I. The Decision Conflicts with This Court’s Due Process Precedent

This Court has held that students possess constitutionally protected property interests in continued enrollment and public benefits. *Goss v. Lopez*, 419 U.S. 565 (1975).

Under *Mathews v. Eldridge*, 424 U.S. 319 (1976), pre-deprivation process is required when protected interests are at stake.

Here, the lower courts did not apply the *Mathews* balancing framework and allowed financial deprivation without prior hearing.