

No. _____

In the Supreme Court of the United States

KENARD SINGH,

Petitioner,

Versus

SECRETARY, DEPARTMENT OF CORRECTIONS,
and FLORIDA ATTORNEY GENERAL

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES
COURT OF APPEALS FOR THE ELEVENTH CIRCUIT

PETITION FOR A WRIT OF CERTIORARI

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QUESTION PRESENTED

1. Whether a court may refuse to apply United States v. Cronin, 466 U.S. 648 (1984), under 28 U.S.C. § 2254(d) absent a prior Supreme Court case involving materially identical facts, even where counsel disclaimed representation, failed to prepare or investigate, and entirely failed to subject the prosecution's case to meaningful adversarial testing at a critical stage?

PARTIES TO THE PROCEEDING

All the parties to this proceeding are named in the caption.

Petitioner is Kenard Singh.

Respondent is the Secretary, Florida Department of Corrections and Florida Attorney General.

No corporate parties are involved in this case.

RELATED CASES

This case arises from the following proceedings in the District Court for the Middle District of Florida and the Court of Appeals for the Eleventh Circuit:

Kenard Singh v. Secretary, Dept. of Corr., et al.
No. 23-11033 (11th Circuit)

Kenard Singh v. Secretary, Dept. of Corr., et al.
No. 19-cv-00617 (M.D. Fla.).

TABLE OF CONTENTS

QUESTION PRESENTED.....	i
PARTIES TO THE PROCEEDING.....	ii
RELATED CASES.....	iii
TABLE OF CONTENTS.....	iv
INDEX TO APPENDICES.....	vi
TABLE OF AUTHORITIES.....	vii
PETITION FOR WRIT OF CERTIORARI.....	1
OPINIONS BELOW.....	1
JURISDICTION.....	1
RELEVANT CONSTITUTIONAL AND STATUTORY PROVISIONS.....	2
STATEMENT OF THE CASE.....	3
A. Statement of jurisdiction in the lower courts, in accordance with this Court’s Rule 14(1)(g)(ii), and suggestion of justification for consideration, as suggested under Rule 10.....	3
B. Factual Background.....	4
C. Procedural History.....	6
REASONS FOR GRANTING THE PETITION.....	8
I. The Eleventh Circuit Decision Below Improperly Requires Factually Identical Supreme Court Precedent Before <u>Cronic</u> Can Apply Under AEDPA.....	8
II. The Eleventh Circuit Decision Below Threatens to Nullify <u>Cronic</u> by Treating Nominal or Symbolic Participation as Constitutionally Sufficient Representation.....	11

III. The Eleventh Circuit Decision Below Improperly Excuses the Absence of Adversarial Testing Based on a Judge's Perceived Hostility to a Defendant.....	13
IV. This Court's Review is Necessary Because the Error Below Will Recur and Gradually Erode Meaningful Sixth Amendment Protection Under AEDPA.....	14
CONCLUSION.....	16

INDEX TO APPENDICES

APPENDIX A	OPINION AND JUDGMENT OF THE UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT (12/03/2025).....a1
APPENDIX B	ORDER DENYING MOTION FOR REHEARING OF THE UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT (02/18/2026).....a18
APPENDIX C	FINAL JUDGMENT OF THE UNITED STATES COURT OF APPEALS FOR THE ELEVENTH CIRCUIT (02/27/2026).....a21
APPENDIX D	ORDER DENYING PETITION FOR WRIT OF HABEAS CORPUS BY THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA, OCALA DIVISION (02/27/2023).....a23
APPENDIX E	JUDGMENT OF THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA, OCALA DIVISION (02/28/2023).....a47

TABLE OF AUTHORITIES

CASES

<u>Bell v. Cone</u> , 535 U.S. 685 (2002).....	9, 12
<u>Florida v. Nixon</u> , 543 U.S. 175 (2004).....	9, 14
<u>Harrington v. Richter</u> , 562 U.S. 86 (2011).....	7
<u>Kenard Singh v. Sec’y, Dep’t of Corr.</u> , No. 23-11033, 2025 WL 3469569 (11th Cir. Dec. 3, 2025).....	1
<u>Lockyer v. Andrade</u> , 538 U.S. 63 (2003).....	7
<u>Strickland v. Washington</u> , 466 U.S. 668 (1984).....	7, 15
<u>United States v. Cronic</u> , 466 U.S. 648 (1984).....	3, 4, 6-9, 10-13, 15, 16
<u>Williams v. Taylor</u> , 529 U.S. 362 (2000).....	8
<u>Wright v. Van Patten</u> , 552 U.S. 120 (2008).....	7

STATUTES

28 U.S.C. § 1254.....	1
28 U.S.C. § 1291.....	3
28 U.S.C. § 2254.....	i, 2, 3, 6, 7, 8
U.S. Const. amend. VI.....	2, 4, 7, 8, 10, 11, 13, 14, 15, 16

RULES

Eleventh Circuit Rule 35.....	1
Federal Rule of Appellate Procedure 35.....	1
Supreme Court Rule 10.....	3
Supreme Court Rule 14.....	3

PETITION FOR WRIT OF CERTIORARI

Kenard Singh respectfully petitions for a writ of certiorari to review the opinion of the United States Court of Appeals for the Eleventh Circuit entered in this matter on December 3, 2025, affirming the judgment of the United States District Court for Middle District of Florida, Ocala Division.

OPINIONS BELOW

The opinion of the United States Court of Appeals for the Eleventh Circuit is not published and appears at Kenard Singh v. Sec'y, Dep't of Corr., No. 23-11033, 2025 WL 3469569 (11th Cir. Dec. 3, 2025). It is attached as Appendix A.

The judgment of the United States District Court for the Middle District of Florida, Ocala Division, is unpublished and is attached at Appendix E.

JURISDICTION

The court of appeals entered its order on December 3, 2025. Pursuant to Federal Rule of Appellate Procedure 35 and 11th Circuit Rule 35, a timely petition for rehearing and rehearing *en banc* was filed on January 13, 2026. Ultimately, the United States Court of Appeals for the Eleventh Circuit denied the petition on February 18, 2026. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

RELEVANT CONSTITUTIONAL AND STATUTORY PROVISIONS

1. The Sixth Amendment to the United States Constitution provides in relevant part: “In all criminal prosecutions, the accused shall enjoy the right . . . to have the Assistance of Counsel for his defence.”
2. Section 2254 of Title 28 of the United States Code, as amended by the Antiterrorism and Effective Death Penalty Act of 1996 (AEDPA), provides in relevant part:
 - (d) An application for a writ of habeas corpus on behalf of a person in custody pursuant to the judgment of a State court shall not be granted with respect to any claim that was adjudicated on the merits in State court proceedings unless the adjudication of the claim—
 - (1) resulted in a decision that was contrary to, or involved an unreasonable application of, clearly established Federal law, as determined by the Supreme Court of the United States; or
 - (2) resulted in a decision that was based on an unreasonable determination of the facts in light of the evidence presented in the State court proceeding.

STATEMENT OF THE CASE

A. Statement of jurisdiction in the lower courts, in accordance with this Court's Rule 14(1)(g)(ii), and suggestion of justification for consideration, as suggested under Rule 10.

The Petitioner, Kenard Singh, was serving a sentence imposed by the State of Florida when he filed a Petition for Writ of Habeas Corpus pursuant to Title 28, United States Code, Section 2254, which provides the district court with the authority to vacate state convictions in certain circumstances. The district court entered judgment on February 28, 2023. Mr. Singh filed a timely notice of appeal thereafter. The Eleventh Circuit exercised jurisdiction over Mr. Singh's appeal under 28 U.S.C. § 1291, which authorizes review of final judgments of the district courts.

This case concerns a violation of the most basic and fundamental constitutional rights defined by the United States Constitution: the right to effective assistance of counsel. The Eleventh Circuit, in denying Mr. Singh relief, declined to apply United States v. Cronin, 466 U.S. 648 (1984) because the unique factual scenario had not been identically addressed by this Court, and as a result, refused to presume prejudice existed where counsel had disclaimed representation, failed to investigate or consult with Mr. Singh and failed to function as an advocate at a critical hearing that resulted in a vacatur of a plea agreement and exposure to life imprisonment.

The decision below presents an issue of recurring national importance. Unless corrected, the Eleventh Circuit's reasoning permits courts to avoid applying Cronin whenever counsel offers even nominal participation, regardless of whether the adversarial process has completely collapsed. That approach threatens to erode the

Sixth Amendment's structural protections and will continue to produce constitutional violations at critical stages of criminal proceedings. This Court's review is necessary to provide guidance to lower courts, ensure uniform application of Cronic and AEDPA, and preserve public confidence in the fairness and integrity of criminal adjudications.

B. Factual Background.

Mr. Singh entered a negotiated plea agreement in Florida state court under which he pleaded guilty to second-degree murder in exchange for a twenty-one-year sentence and an agreement to testify truthfully against a co-defendant. The sentence was imposed at the same time that the plea was entered, which was all done prior to the co-defendant's trial that Mr. Singh would later testify at.

Following his testimony against his co-defendant, which ultimately led to his conviction, the State of Florida filed a motion alleging that portions of his testimony deviated from his earlier sworn proffer. The motion filed moved to vacate both his plea agreement and sentence, exposing him to a term of life imprisonment.

Just days prior to the hearing on the State's motion, retained counsel Jack Maro filed a notice of nonrepresentation, asserting that his representation had ended after sentencing. Prior to said filing, there had been no orders granting his withdrawal or removing him from the case.

When the hearing on the State's motion commenced, counsel was seated in the audience rather than at counsel table. The trial court immediately questioned whether Mr. Singh was represented, "Mr. Maro's in the audience. Are you not his

counsel?” Counsel responded, “No, sir...Mr. Singh is no longer my responsibility.” Counsel repeatedly advised the court that he did not believe he represented Mr. Singh, that he had not been paid, and that he was unprepared to proceed. Counsel had not attended the co-defendant’s trial, had not reviewed the relevant testimony, had not investigated the alleged plea violation, and had not consulted with Mr. Singh before the hearing. Counsel also revealed a disagreement that had arisen between himself and Mr. Singh, creating a clear conflict. However, the state trial court judge nevertheless ordered that counsel remain and proceed with the hearing that same day.

Before any evidence was presented, the state court openly expressed hostility toward Mr. Singh and stated that it had a “visceral reaction” to Mr. Singh’s testimony, describing it as “fundamentally apparent” that Mr. Singh had failed to comply with the plea agreement. At the hearing, the State introduced testimony excerpts and a recorded jail call in which Mr. Singh allegedly stated that he had attempted to help the co-defendant during trial testimony. Counsel presented no evidence, conducted no meaningful adversarial testing of the State’s allegations, and offered no substantive defense to the alleged breach of the plea agreement. Instead, counsel effectively conceded the issue and focused primarily on whether the court should vacate both the plea and sentence, rather than the sentence alone.

The trial court granted the State’s motion, vacated Mr. Singh’s plea agreement and twenty-one-year sentence, and appointed new counsel only after the hearing had concluded. The court remarked that Mr. Singh would “never” again receive a twenty-

one-year sentence and stated: “If he wants to be stupid and make those calls, I’ll help him be stupid.”

Mr. Singh was subsequently retried, convicted of first-degree murder, and sentenced to mandatory life imprisonment.

During later postconviction proceedings, counsel admitted under oath that he “didn’t have a clue” about the underlying allegations at the time of the hearing because he had not attended the co-defendant’s trial and did not believe he still represented Mr. Singh. Counsel further admitted that he lacked the information necessary to defend against the State’s motion.

C. Procedural History.

On December 4, 2019, Mr. Singh timely filed a petition pursuant to 28 U.S.C. § 2254 with the district court. (Doc. 1). Of relevance to the instant petition, Mr. Singh alleged that he received constitutionally deficient representation when counsel failed to adequately represent him at a critical motion hearing that resulted in the most damning prejudice possible. (Doc. 1, 2). Mr. Singh argued that counsel’s representation was so non-existent that this case fit within the rare exception of Cronic. The district court disagreed and found that Cronic was not appropriate. (Doc. 15 at 18). The district court denied the claim on the basis that there was no precise precedent that was instructive or gave a clear answer to the question raised by Mr. Singh. (Doc. 15 at 23).

Following the issuance of said order, Mr. Singh exercised his right to appeal and filed an Application for Certificate of Appealability with the Eleventh Circuit

Court of Appeal. On January 10, 2024, the Court granted his request and briefing commenced on the singular issue of:

Whether the district court correctly denied Singh's claim that he was denied his Sixth Amendment right to counsel, in violation of United States v. Cronic, 466 U.S. 648 (1984), at the hearing on the state's motion to vacate the guilty plea and sentence?

After the parties submitted briefings on the issue, this Court entertained the matter at an oral argument. On December 3, 2025, an opinion was issued affirming the district court's denial. Therein, the Eleventh Circuit described the representation and its decision as a "close call." (Pet. App. a13).

The Court acknowledged that counsel "was sitting in the audience and insisting that he wasn't Singh's lawyer," "wasn't prepared for the hearing," "hadn't investigated any potential defenses," and "hadn't consulted with Singh in anticipation of the hearing." (Pet. App. a13). But, because some small portion of counsel's actions during the second portion of the hearing were not a "complete" failure as required by Cronic, "there is at the very least the possibility of 'fairminded disagreement' over whether Cronic was the correct standard." (Pet. App. a14).

Thus, there is at the very least the possibility of "fairminded disagreement" over whether Cronic was the correct standard. See Harrington, 562 U.S. at 103. Even if it was incorrect to apply Strickland, the state court's decision to do so was not "objectively unreasonable." See Lockyer, 538 U.S. at 75. Furthermore, the state court's decision wasn't contrary to clearly established federal law because no Supreme Court decision had "squarely addresse[d]" this issue or "clearly establishe[d] that Cronic should replace Strickland in this novel factual context." Wright v. Van Patten, 552 U.S. 120, 125 (2008). Therefore, under § 2254, we defer to the state court's application of Strickland and hold that the district court properly denied Singh's habeas petition.

(Pet. App. a14-15).

Mr. Singh sought a petition for rehearing and petition for rehearing *en banc*. However, his petition was ultimately denied. (Pet. App. a19-20).

REASONS FOR GRANTING THE PETITION

This petition presents a fundamental question concerning whether the AEDPA allows lower courts to nullify Cronic by demanding factually identical Supreme Court precedent as a requirement before recognizing constructive denial of counsel. Although Cronic is historically reserved for cases that involve a narrowly defined set of deficient circumstances, the Eleventh Circuit's decision undermines structural Sixth Amendment protections and risks the availability of Cronic for future defendants.

I. The Eleventh Circuit Decision Below Improperly Requires Factually Identical Supreme Court Precedent Before Cronic Can Apply Under AEDPA.

The decision below conflicts with this Court's established AEDPA jurisprudence by effectively requiring Mr. Singh to identify a prior Supreme Court decision involving materially identical facts before relief under United States v. Cronic, 466 U.S. 648 (1984), could be granted. That is not the standard imposed by 28 U.S.C. § 2254(d), and this Court's review is necessary to restore uniformity in the application of clearly established federal law.

This Court has repeatedly explained that "clearly established Federal law" does not require a prior decision addressing the exact factual scenario presented in a later case. Williams v. Taylor, 529 U.S. 362, 405–06 (2000). Rather, AEDPA asks whether the governing constitutional principle established by this Court applies to

the facts before the state court. Where a state court unreasonably refuses to apply a governing constitutional rule to a new factual setting, habeas relief remains available. Id.

The constitutional principle at issue here is neither unsettled nor novel. In Cronic, this Court held that prejudice is presumed when “counsel entirely fails to subject the prosecution’s case to meaningful adversarial testing.” 466 U.S. at 659. The rule announced in Cronic is structural in nature and safeguards the integrity of the adversarial process itself. Subsequent decisions of this Court have clarified the contours of that framework. In Bell v. Cone, 535 U.S. 685 (2002), this Court explained that counsel’s failure must be complete. In Florida v. Nixon, 543 U.S. 175 (2004), this Court distinguished strategic concession from true adversarial collapse. Together, these decisions establish the governing constitutional framework applicable here.

Rather than apply that framework to the extraordinary facts before it, the Eleventh Circuit concluded that relief was unavailable because “no Supreme Court decision had squarely addressed this issue” in this “novel factual context.” In so doing, the court improperly transformed AEDPA into a requirement for factual identity. Ironical to this Court’s consideration is the lower court’s open acknowledgement of how extraordinary the circumstances were in the instant case. The panel recognized that counsel “was sitting in the audience and insisting that he wasn’t Singh’s lawyer,” “wasn’t prepared for the hearing,” “hadn’t investigated any potential defenses,” and “hadn’t consulted with Singh in anticipation of the hearing.” The court further

acknowledged that counsel “didn’t have a clue” whether Mr. Singh had complied with the plea agreement because he had not attended the underlying trial.

Despite recognizing these facts, the Eleventh Circuit concluded that habeas relief was unavailable because this Court had not previously addressed a case involving the precise procedural posture presented here. That conclusion improperly narrows AEDPA beyond anything this Court has authorized. Moreover, because this Court has consistently emphasized that Cronic applies only in a narrowly limited class of extraordinary cases, it is unsurprising that no prior decision has presented materially identical facts. Structural collapses of the adversarial process sufficient to trigger Cronic are, by definition, rare and exceptional Sixth Amendment violations.

This Court has consistently rejected the proposition that clearly established law exists only where prior precedent mirrors the facts at issue. Constitutional principles announced by this Court necessarily govern a range of factual applications. If lower courts may evade Cronic merely because counsel’s complete failure occurred during a factual scenario that has not been the center of a prior analysis conducted by this Court, then the protection recognized in Cronic becomes illusory.

This Court’s intervention is necessary to reaffirm that AEDPA does not require factual duplication before clearly established constitutional principles may be applied, and to ensure that Cronic remains a meaningful safeguard against the constructive denial of counsel at critical stages of criminal proceedings.

II. The Eleventh Circuit Decision Below Threatens to Nullify Cronic by Treating Nominal or Symbolic Participation as Constitutionally Sufficient Representation.

The decision below also substantially narrows the holding in Cronic, by determining that nominal participation alone is sufficient to avoid the presumption of prejudice. In other words, it provides a loophole for counsel, even when counsel has wholly ceased to function as a meaningful advocate. If left undisturbed, the Eleventh Circuit's reasoning threatens to reduce Cronic to a dead letter and permits constructive denials of counsel to evade meaningful constitutional review.

This Court has long recognized that the Sixth Amendment guarantees more than the mere physical presence of an attorney in the courtroom. The constitutional right to counsel exists to preserve the integrity of the adversarial process itself. Cronic therefore applies where counsel "entirely fails to subject the prosecution's case to meaningful adversarial testing." 466 U.S. at 659. The inquiry is not whether counsel uttered a few words during the proceeding, but whether counsel functioned as an advocate in any constitutionally meaningful sense.

The extraordinary facts of this case demonstrate precisely the type of adversarial collapse contemplated in Cronic. Counsel expressly disclaimed representation at the outset of the hearing and informed the court that Mr. Singh was "no longer [his] responsibility." Counsel had filed a notice of nonrepresentation before the proceeding began. Counsel further admitted he was unprepared, had not attended the underlying trial testimony forming the basis of the alleged plea violation, had not investigated the State's allegations, and had not consulted with

Mr. Singh before the hearing. Indeed, counsel later admitted under oath that he “didn’t have a clue” whether Mr. Singh had complied with the plea agreement because he lacked knowledge of the relevant proceedings. Despite these extraordinary circumstances,

constitutionally sufficient representation improperly elevates form over substance and strips Cronic of practical effect.

III. The Eleventh Circuit Decision Below Improperly Excuses the Absence of Adversarial Testing Based on a Judge's Perceived Hostility to a Defendant.

The final reason why the decision below warrants this Court's review is because the Eleventh Circuit improperly justified the absence of meaningful adversarial testing based upon the trial judge's perceived hostility toward Petitioner. In doing so, the court fundamentally misapprehended the structural protections underlying the Sixth Amendment and Cronic.

The Eleventh Circuit expressly relied upon the trial judge's predisposition against Mr. Singh in concluding that counsel's failure to challenge the State's allegations may have been reasonable. The court explained that the trial judge had a "visceral reaction" to Mr. Singh's testimony and believed it was "fundamentally apparent" that Mr. Singh violated the plea agreement. The panel then reasoned that, "[f]aced with these comments, Maro reasonably could have concluded that it would be 'a useless charade' to challenge the judge's own assessment of the trial testimony."

That reasoning cannot be reconciled with this Court's Sixth Amendment jurisprudence. In fact, the Sixth Amendment is most essential precisely when a defendant faces an unfavorable tribunal or overwhelming prosecutorial pressure. The constitutional guarantee of counsel exists to ensure that the State's allegations are subjected to meaningful testing before liberty is taken away. Permitting courts to

excuse the absence of advocacy because a judge appears unlikely to rule favorably turns that principle on its head.

This Court's decision in Florida v. Nixon, 543 U.S. 175 (2004), does not support the result below. Nixon recognized that counsel is not ineffective for refusing to engage in a "useless charade" where counsel remains actively engaged in an overarching defense strategy designed to spare the defendant from execution. Id. at 192. But Nixon involved functioning counsel pursuing a coherent strategic objective after investigating the case and actively representing the defendant throughout the proceedings.

This case is fundamentally different. Counsel here expressly disclaimed representation, lacked familiarity with the underlying proceedings, failed to investigate the alleged plea violation, failed to consult with Mr. Singh, and presented no meaningful factual opposition to the State's allegations. The "useless charade" language from Nixon cannot reasonably be extended to justify complete adversarial collapse simply because counsel believed the trial judge had already formed a negative view of the defendant.

IV. This Court's Review is Necessary Because the Error Below Will Recur and Gradually Erode Meaningful Sixth Amendment Protection Under AEDPA.

Although the harm caused directly to Mr. Singh creates a persuasive reason for this Court to review this matter, the decision below presents an even greater issue of exceptional national importance because the reasoning employed by the lower court creates a framework under which constructive denials of counsel may

repeatedly evade meaningful federal review. Unless corrected, lower courts will continue narrowing Cronic through increasingly formalistic applications of AEDPA that prioritize superficial attorney participation over the existence of any real adversarial testing.

The danger is particularly acute because the circumstances triggering Cronic are, by this Court's own design, rare and extraordinary. Structural collapses of representation seldom arise in identical factual settings. As a result, if lower courts require a prior Supreme Court case involving materially indistinguishable facts before granting relief, Cronic will become effectively unenforceable in nearly every future case. Courts will always be able to characterize the factual scenario before them as "novel," even where the adversarial process plainly failed.

The consequences extend well beyond this case. Critical-stage proceedings frequently occur in expedited, informal, or procedurally unusual contexts, including plea-withdrawal hearings, probation violations, sentencing modifications, revocation proceedings, and post-plea litigation. In such proceedings, courts may increasingly excuse the absence of meaningful advocacy so long as counsel is physically present and intermittently speaks. The Sixth Amendment, however, guarantees an advocate—not a symbolic participant.

This Court's intervention is therefore necessary not merely to correct an error in this individual case, but to preserve the continuing viability of Cronic itself. Without clarification from this Court, the constitutional distinction between ineffective assistance under Strickland and constructive denial of counsel under

Cronic risks collapsing entirely, allowing structural Sixth Amendment violations to evade review through the mere appearance of representation. If AEDPA permits courts to treat nominal attorney presence without actual advocacy as constitutionally sufficient representation, absent a prior case with identical facts, or excuses counsel's lack of representation because of irrelevant factors such as hostility from a tribunal, then the protection recognized in Cronic will survive only in theory, not in practice. Therefore, this Court should grant certiorari to remedy this improper construction and application of Cronic in order to ensure that not future violations of similar magnitude take place.

CONCLUSION

For the reasons stated above, Kenard Singh, respectfully submits that the petition for a writ of certiorari should be granted.

Respectfully submitted,

Kenard Singh, Petitioner

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