NO. 25A697

OCTOBER TERM, 2025

IN THE SUPREME COURT OF THE UNITED STATES

TRAVEN BOYER-LETLOW,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

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

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED FOR REVIEW

1. Given the absence of probable cause to arrest here, **and/or** the right to seize, **and/or** the right to shackle here (and detain and the like, as was done here) **and** given the fact of a lack of probable cause: can it be said, as it was (with impunity) that: the basis for the seizures, the arrest, the confinement, the illegal search, and to detain arguably was not violated here, indeed with impunity.
2. Whether given the extreme vacillation, by the Government, on the existence of **probable cause to Arrest and to Seize** here, coupled with the indisputable failure to **Mirandize** issues, **and** given these findings (that probable cause to arrest and/or seize were said not to exist here) and given our contention, the State also failed to show its presence in any of the respects it was required to prove its existence, the fact of their non-presence must be validated.
3. Given, **Miranda v. Arizona, 384 US 436 (1966)**, was, in our judgement, ignored, with impunity, it follows here any assumption that could be done with impunity (as it was here) – as it was by these Courts, violated Due Process.
4. Whether, given **the arrest**, **the seizures** and **the detentions** (shown to have occurred here) were indeed condemnable as we say: one thing is clear. It is beyond dispute that various rights related to **Boyer-Letlow's** (our Petitioner) were egregiously violated. And, given that reality is, and was so, it inexorably follows; none of these convictions can survive meaningful scrutiny. For sure then, and so postured, this case should be reviewed. Indeed, it is beyond dispute that these men were clearly stopped, seized and arrested, indeed by Federal Agents who were clearly acting on their own authority. And, with that being so,

they victimized this individual – indeed egregiously so. Now it is up to this Court to step up to the plate. We ask that that be done for this individual.

Indeed, the quest now is augmented by the fact that this Trial Judge seemed clearly not to understand, what we said elsewhere, and this we did because it is our belief, as we have said before (and elsewhere), that the rights of the very best amongst us are only as secure as the rights of the vilest amongst us are protected. And, because this is so, we are offended these Judges think otherwise. Surely then this Court will correct this flawed belief, so postured, we ask that it be done – in the interest of Justice.

STATEMENT OF RELATED PROCEEDINGS

There are no related cases or proceedings that Counsel is aware of. This case involved an isolated incident.

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RELEVANT STATUTES, RULES AND CODES

CONSTITUTIONAL PROVISIONS

TO THE HONORABLE, THE CHIEF JUSTICE AND ASSOCIATE JUSTICES OF THE SUPREME COURT OF THE UNITED STATES:

The petitioner, **Traven Boyer-Letlow**, respectfully prays that a **Writ of Certiorari** issue herein. Indeed, it should be done to review the final judgment of the United States Court of Appeals for the Sixth Circuit. It was originally journalized in this case on **July 29, 2025**, and made final (by order of the United States Court of Appeals [or the Sixth Circuit]) on **September 22, 2025**. Then is when that Court denied our Petition for **En Banc** Rehearing. The date of that denial was **September 22, 2025**. So postured, by these events, this Petition is being filed seasonably. It is a given it will be filed before **January 20, 2026** – the date given us to make a seasonable filing. Indeed, and for sure, it will aptly address these issues. Indeed, all the more so, this should be seasonably done.

To be sure, given the Court **aptly** granted our Motion, that Counsel be appointed to represent the Petitioner (in this appellate effort). It follows Counsel's efforts were to comply. Still, we actually had a Judge categorically stating, **as this judge did,** that: he was not sure these officers **even needed** "probable cause" to take (as it turned out) on their own authority their money. Given the Trial Court said: **he was not sure (as we are that)**: the officers here even needed **probable cause to seize** any money is for sure (as we also see it): at the very least, this Court was wrong. For they needed probable cause to seize or arrest. This was not proven. For sure, for our Judge to make certain categorical statements (all those especially assailed herein) can hardly be relegated to being mere declarations that lack impunity. They should be regarded as being dispositive here.

OPINIONS BELOW

U.S. v. Boyer-Letlow, is reported (in Westlaw) as **2025 WL 2142639**. Both were denials. Still, this Petitioner is being seasonably proceeded against. Admittedly, it was in the wake of an extension, which was extended until **January 20, 2026**. (And, while Counsel is actually in the

Hospital, our hope was we met the deadline).

STATEMENT OF THE GROUNDS ON WHICH THE JURISDICTION OF THIS COURT IS INVOKED

The judgment of the United States Court of Appeals was finalized when the Sixth Circuit denied a Re-Hearing. This fact finalized these convictions. Indeed, they only existed here because this Court granted us an extension to file our Petition, which is being prayed for herein. Granted, our hope, of course, is that this Court recognizes what is apparent to us. Thus, it should be apparent to the Court that when these agents told **Tra'ven Boyer-Letlow** that he would **only** be arrested if he refused to surrender the money that he had in his possession, and, he also told once he did that he was free to leave, that was real to him.

CONSTITUTIONAL AND STATUTORY PROVISIONS

The principal provisions of the Constitution involved here are clear. They are:

> **Amendment IV: "**The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized."
>
> **Amendment V: "**No person… shall be compelled in any criminal case to be a witness against himself…"
>
> **Amendment VI:**" [i]n all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the State in the district wherein the crime shall have been committed which district shall have been committed which district shall have been previously ascertained by law…"

STATEMENT OF THE CASE

In evaluating the various segments here, I start with the fact that this Petitioner had indeed **cleared** all of the impediments that had been created to protect the flying public's safety in their flights. Indeed, here all these things our Petitioner passed with flying colors. This had occurred

before he was seized. To be sure, the assailed seizures occurred when he originally stopped on the Boarding Bridge, which provides passage to the seats on the plane. The lack of any basis (whatsoever) to even stop them, simply put, cannot be disputed. This is so: indeed, in logic, law or common sense. And for that compelling reason, our lack of probable cause of thesis cannot be defended – in our judgement. And, of course, it will not be defended, although the effort will be made.

Indeed, the first hitch occurred, in the wake of our Petitioner (and his flying companion) being stopped by these agents. It occurred **after** they had been cleared to board their aircraft. And indeed, they were in the process of doing so. When they stopped them, it was to express concern about certain bulges in their clothes. Clearly, they lacked any right to do this. Yet it is clear they arrogated the right to do so. Likewise, it is also clear; these officers proceeded to arrogate themselves the right to clearcut theirs that they proceeded to violate.

Likewise, these officers, given their apparent warped motivations, clearly had to know at that point (for sure) **an arrest** then occurred. And, given that event was clear, our stance is that fact was critical. For it is clear, these people were being illegally arrested. And were further victimized as we have shown – and will continue to do.

As to this let's be very clear. We also know these officers lacked any basis to believe **Boyer-Letlow** (and his companion) had committed or was indeed committing any criminal acts. Yet, despite these indisputable realities, the officers, nonetheless, arrogated themselves (indeed acting solely on their own gumptions) the right to suppose that our Petitioner was engaged in some sort of criminal conduct. And they arrogated the right to fully investigate them – indeed as being drug offenders. Again, this is precisely what they did in the wake of their conduct – which is being assailed as being indefensible.

Indeed, in the wake of their effort to further victimize these travelers, the officers first clearly ignored the teachings of the **Terry** and **Beck** cases (cited elsewhere) and their progeny. This it did despite the lack of any basis for doing so. For clearly it was then they illegally **seized**, not only, the travelers, but their possessions. Indeed, that they did. It is also clear (indeed). This is so despite the lack of any defensible basis for doing so, to justify manipulating the facts. Clearly, in our judgement, what they did wrong was first was they: arrested these people. This is so despite the teachings of both the **Terry** and **Beck** case, which are critical here. As, of course, are the other cases relied on. See **Missouri v. McNeely**, cited elsewhere. It addresses this issue.

Indeed, given the Trial Court conceded (indeed in our judgement), the officers lacked probable cause to arrest. This is by failing to do so. So postured, it could not be any clearer these people were indefensibly placed under arrest. In our judgement, so postured, given that reality it could not be any clearer. Clearly, they were victimized. In fact, **the Presiding Judge** (here) issued declarations which resolved the Trial. This he did in a maze of warped declarations that are and were from our perspective indefensible. He said no probable cause was needed here.

This (in our judgement) inexorably follows. And it is so because one thing is clear, if anything is. Simply put, these Agents **failed** to prove they had "probable cause" to (**a**) make an arrest. Indeed, when the arrest was made of Boyer-Letlow, for sure, they absolutely were required to **Mirandize** him. This is because he was indeed **arrested** on the plane. And, as to that being so, any disputing such was indeed the case cannot survive reality.

Further, by telling **Boyer-Letlow** that while he was not being arrested, **but** he could only leave if he surrendered the money, for sure this translated into an arrest – in our judgement. For sure, our belief is that probable cause is required here for these agents to seize that money. And, given the fact that Boyer-Letlow surrendered his money, in the wake of the officers' threats (he

could not leave until he did so) we say that declaration was compellingly effective. This follows because it be said with impunity these officers had probable cause to seize anything. For sure we are contending, indeed with all our effort to show our client despite the fact the proof shows he was in any event a drug dealer. But that is not the test.

Indeed, we have always lived by the idea that he who would make his own liberty secure, must protect even his enemy from oppression. For (we believe) he who violates that tenet may establish a tenet that would reach unto himself. Given, as well, we believe that in the wake of apt tenet this Court to pay heed here to that tenet which shows what goes around, comes around. And, as so postured given the realities exposed herein view this case as one apt for review.

To be sure, it is a fact our stance here is clear they were arrested. Indeed, and for sure this occurred when they were told that while they were not being arrested and they would not be **but** to avoid that happening they had to surrender the money first. And they were also told that to that end: they had to **first** be escorted elsewhere, then afterwards they would be free to leave.

So postured, our contentions here, when these people submitted (as they did) to being arrested, it was a critical event here. They were forcibly detained, despite their complaint, it could be justified. Thus, it follows, the **Further Detention** here, indeed given the traffic investigation was over (which was severe), and which we know was illegal. It was in addition painful. It was also indefensible. This is because **it was not based on probable cause**. And clearly it was likewise indefensible. This is because of its limited utilization here. Indeed, after the traffic phase of the stop had been otherwise exhausted. And indeed, it had been depleted of any thrust it ever had any further search was indefensible – in our judgement.

And, with that being so any further search (made of the vehicle) as well as the time spent on that effort cannot be defended, indeed in law, logic or commonsense. And, because that is so it could not, cannot and will not be justified.

STATEMENT OF THE FACTS AND EVIDENCE

The facts here, simply put, show Boyer-Letlow; the Petitioner herein, was a passenger on what was slated as an airplane, bound for Los Angeles. He had cleared all of the apparatuses erected and operated by the Government. These devices screen all passengers and all others. Indeed, the facts here will also show our Petitioner was good to go – when he was stopped on the Loading Bridge. And they showed that his progress toward his seat was being aborted by these agents. They, of course, were acting on their own authority, which they exercised – in our judgement, inappropriately.

Indeed, when brazzely stopped (by these Federal Agents), which occurred after he had been observed a short while before with a traveling companion. Understand both of them had cleared the Ticket Takers for the flight. Indeed, they were actually on the Boarding Bridge (the apparatus that connects the building to the plane, over which one must travel to get to their seat). Here the Agents, indeed only one of which testified, revealed his version in the Hearing had on the Motion to Suppress. And, in its wake, our Petitioner entered guilty pleas. He was also denied an Appellate Bail.

Given that reality, we lodged this Appeal. The Bail application was also summarily rejected. Of course, these most compelling statements here, which were made and endorsed by the Trial Judge, (simply put) cannot be ignored with impunity. Yet arguably this is what happened. This happened because that Court actually endorsed **the** certain flawed rationales he expressed

elsewhere. Yet even some of the trial Court's expressed thoughts are, and were, indeed: beyond belief – rotely so.

So postured, it is a fact, in our judgement, it could not be any clearer, various of the Trial Court's resolutions seems clearly to have been made out of whole clothe. And likewise, it is a fact, too many of the rationales expressed (by the sole testifying agent) show this agent (and his companions) were completely flawed, as were several of the Court's various views on certain crucial (and dispositive) issues.

For sure, here then. The compelling facts here show, despite the Court's vacillation, the way it happened was unacceptable. Likewise, the Trial Court also **ignored** certain other critical principles. Here they distill (in earnest), and likewise, from **Terry, Beck, Mapp**, **Sibron** and **Mendenhall**. Here too, these Courts also ignored the salient fact that **Miranda v. Arizona, 348 US 436 (1966)**[1]. It was not even slightly mentioned (or reckoned with) by this Court here. Indeed, that was, in our judgement, deliberately so. For actually, it was ignored, (in our judgement) with impunity, which was not only deliberate, but asinine. It was also indefensible – indeed, this clearly appears likewise to be a product of flawed thinking. Yet, it was endorsed – to our detriment – if you can believe it.

To be sure then. The fact that our Trial Court would even vacillate on these issues actually shows, indeed compellingly so, is unacceptable. Also, this dogmatism shows just how far our Judges were off the reservation. For they had to know they could not have it both ways.[2] Indeed,

[1] All these cases are cited elsewhere. They show that when the search for what is being looked for. The search should be over when it is found – but not here.

[2] The various cases cited in the "List of Cases" relied on all make the point that probable cause, or at least a reasonable suspicion, arguably related to any type of criminal activity had surely ended. And, indeed it must exist, and show the requested probable causes existed here. And we are contending in the argument made below those hurdles were not crossed.

given our extreme, indeed dogmatic references to **Miranda**, which were compellingly apt here. This condemnation really could not be any clearer here. For indeed, we have some of **the most flagrant** violations that actually occurred here.

As to this being so: see **U.S. v. Evans, 786 F.3d 779 (2015)**. It compellingly shows, at least this Counsel, the Sixth Circuit really needs help here. Indeed, and for sure, **Evans** makes compelling points that are especially apt here. Indeed, **one** being that our Courts cannot ignore with impunity, as these courts did the fact that once these agents told **Boyer-Letlow:** when he would only be free to go (**which would be after he surrendered [to them] his money)** it was clear they had already **seized** the money. And clearly they were acting on their own authority. For sure that reality makes clear our point. Indeed, not only our defense. Thus, the fact these officers were acting on their own authority, to be sure magnifies **this reality**.

This follows, indeed here in particular, since they were told once they surrendered their money they would be released. The inference one gets from that threat is clear enough.

Simply put, that point is insurmountable. For it made clear (to them): **they were not at liberty to leave until after they surrendered their money (which was still in their possession**) -- that is, they had possession, but no control over it -- none. Given it is a fact **Boyer-Letlow** (and his friend), nonetheless fully capitulated to the onerous conditions imposed on them – that is, they submitted to being escorted from the "plane" to where they were taken. Indeed, there they surrendered their money (-- as the price paid for their freedom). So postured and given the fact that was the way it was done, cannot be disputed, it inexorably follows: those compelling facts are indisputable here. And what they also show cannot be, either, disputed or ignored. Yet, it seems clear that is precisely what the Trial Judge; as well as, the Government (the real culprits here) **and**

the Sixth Circuit seemed quite willing to do and did – despite the lack any rational basis – which does not phase this Court.

For this is indisputably clear. Indeed, this is so despite the Trial Court's earlier **ramblings**. For here the tried Court had to have, somehow, convinced himself that these monies were indeed prey (for him). And this was so, indeed because in actuality they were simply in our Petitioner's possession. Clearly, indeed because it had already been seized from the plane. So postured, the seizure itself lacked a probable cause basis. Clearly too those facts show an extreme capitulation, not only, to being forcibly removed from the passenger list, but to their being forcibly "**escorted**" to another location (at the airport). These facts indubitably show the money was indeed **illegally** seized, indeed by the culprits here. If it were otherwise, then clearly the Agents would have lacked the control they had, and used, to forcibly escort to where it was then literally taken from them.

At least that was most clear to us. Likewise, it was and as well. To their captors – at least in our judgement. And, as to that being so let's be clear. Given the fact that telling our Petitioner that he had to surrender (to them) this money **before** they would be released was an ultimatum – in our judgement. So postured, by these indisputable.

Let's also be clear here. Clear, as well, certain other critical facets here are being ignored. Indeed, by these Courts. For sure, given the location of the original encounter (which, for sure, is most clear), it is a given: the **onus** was at all times on the agents to prove the existence of (**1**) **probable cause** to arrest; as well as, (**2**) the fact that **Miranda**, and the full range of its significance here, were reckoned with. And we know that did not happen.

For sure, as well, we know this is so. Indeed, because of what is clear. For the Trial Judge actually centralized its major point (as he had to) that no arrest occurred in the Airport Building. And, for sure we know that thesis cannot be defended in law, logic or commonsense. Likewise,

other assailed arguments, falsely made, below further show, not only, that: probable cause to arrest and/or seize was not shown. This is, of course, one of our central theses here. Also, given the money (centralized herein) was likewise illegally seized, we also believe we will prevail. For its seizure here, not only cannot be defended its admission clearly would be pathetic. Indeed, no effort will be made to show this money was lawfully seized.

Further, the facts could not be any clearer. Indeed, apart from the fact that our Trial Judge had brazenly said (in the wake of his vocalized – albeit flawed assessment – of these facts) that (1) probable cause to arrest, or to seize, was not required here and that (2) absolutely nothing generated by **Miranda** (and its progeny) had neither, our Petitioner or his property was illegally seized (or taken from him in violation of the law).

Also, and this too is so compelling. It also provides a reality here: to be reckoned with. Recall here, while Red Cloud once said: the government made them many promises, but they only kept one. The Government promised to take their land and they took it. This reality is comparable. For here they not only promised **Tra'ven Boyer-Letlow** due process, and a fair resolution (of the issues in accordance there with they also promised due process. Likewise, some of us know the actual facts are compelling here. And, given those versions that occur, do believe also they are, and were apt. Indeed, if that were not so, our endorsement would be lacking.

ARGUMENTS RELIED ON FOR ALLOWANCE OF WRIT

In these various arguments, indeed aptly and compellingly, we have the Courts below, indeed making the effort to evade a collection of compelling contentions made by us. They show the Court below here, especially ignored the thrust of contentions that validate our contentions. Especially those that show that in the wake of queries, laten in their question, it was clear these officers were on the quest for a basis to make an arrest.

As to that being so, no other reason justifies their efforts. And being as skilled as they were their effort included an intent to inveigle these people not to realize they were really being interrogated by experts – indeed who were bent, at all times, to lure them.

ARGUMENT NO. I:

GIVEN THESE OFFICERS, WHO STOPPED OUR PETITIONER, PROLONGED HIS BOARDING AFTER HE HAD BEEN CLEARED TO BOARD HIS FLIGHT, IT FOLLOWS HE WAS IMPERVIOUS TO BEING ARRESTED OR SEIZED, ABSENT PROBABLE CAUSES. AND SO POSTURED IT INEXORABLY FOLLOWS, HIS *FOURTH* AND *FIFTH AMENDMENT* RIGHTS WERE AT THE RISK OF BEING VIOLATED HERE. HENCE, IT INEXORABLY FOLLOWS HIS CONVICTION FOR BEING IN POSSESSION OF THE MONEY (FOUND IN HIS POSSESSION) CAN NOT BE CRIMINALIZED.

Boyer-Letlow, the Petitioner herein, was egregiously victimized by these arresting agents (and especially the Courts below). We are, for sure, contending his rights were indeed violated. For sure, as well, while it was done primarily by the various Courts below (that rejected our complaint), it was done all the moreso by those who have failed to recognize (as we do) that the rights of the very worse amongst us are only as secure as those of the very worse (amongst us) are protected – by our Courts.

Yet, and to be sure, the flaws here could not be any clearer. Indeed, it is a given the fact is our Petitioner herein had been cleared to board (his flight to Los Angles from Cleveland). This occurred even before he and his traveling mate were accosted by these intermeddlers. For a fact, they were acting on their own authority. For here, indeed: insuperable facts show these two (2) Federal Agents, who had been observing them, then proceeded to make themselves known. This by intruding themselves into, not only, their flight plans, but into their lives as well. This is so despite the fact they lacked any **probable cause** to do so – which is and was clear, indeed enough. It is and was clearly indisputable.

In doing so, they arrogantly advised these travelers (who had been cleared board). This was done simply because they had noticed certain bulges in their clothes. And, in its wake they believe it to be money. Further, they indicated to them that while they were not being arrested and they would be free to leave, the Agents had to dispossess them of that (believed to be) money first. And afterward they would be free to leave.

And, it was said (by them) that: to that end they would have to be escorted elsewhere **first**. This indeed: was to facilitate their giving up their money. Clearly, with the indications being that: if indeed they intended to be released (without other fanfare): they would have to surrender that money. And, to that end, while the Trial Court had indicated: he was not convinced the Agents even needed probable cause: he (the Trial Judge) nonetheless recognized and endorsed the Agents' actions. Indeed, the District Court also, indeed categorically acquiesced. Clearly he ruled: they had to surrender that money (**before** they could leave). Indeed, it was all said and shown that the Petitioner's friend was allowed to leave, but without his money.

Indeed, and while the Court itself allowed all this to happen (to this hapless soul, and his Counsel): it could not be any clearer the Trial Court here also failed to insure that this hapless soul was accorded the due process he was entitled to. For sure: the Court had to know, as we do, even the original stops were indefensible. Likewise, there is no way it can be said, with impunity, that **Boyer-Letlow** was not under **arrest**. Indeed, this eventuated when he was told he could only be released: **if** and **when** he submitted to being purposefully **escorted** elsewhere. And he was told thereafter: he had to also **surrender** his money to them – which is what happened.

As to this reality, our judge actually stated: **he was not convinced an arrest had occurred**, indeed in the wake of these brazen declarations. As we see it, his failure to recognize that fact is indefensible. For, not only were these people illegally arrested, but the facts also related to these

events, not only, make that fact clear. For sure, and simply put, our Court also failed to protect this Petitioner against being further victimized. It also ignored their tactics were otherwise flawed.

And, while all that is clear enough, it is also clear that not only was our Petitioner further victimized, he was also denied due process of law – indeed in other ways that are likewise unforgivable. Yet, while that is so, it is not too late. It is never too late to do the right thing. So postured, while Red Cloud said they made him many promises, but they only kept one – they promised to take their land and they took it.

Here too, it is true. **Boyer-Letlow**, like all those accused, was also promised a fair trial. Yet, it is a fact here; our Court was compelled to believe that the **onus** only required the defense to prove (to this Court) that these two (2) victims here were wrongly targeted by these agents. And that this was so because (despite under the facts here) at all times they were presumed to be innocent. Yet, it happened, **indeed despite the facts** that should have compelled our Judge to believe otherwise, made it clear he believed we failed to properly evaluate the facts here.

You see he believed they were properly stopped and arrested. This is despite the lack of any constitutional basis for doing so. Indeed, the proof we are right is compelling here. This is so because the assailment here is a joke. Indeed, and for sure, no basis can be said to exist as a basis to stop these people. This follows because of the fact they attempted to conceal what turned out to be money in the bulges in one's clothes is not a crime. Given it was not a crime is really a fact that must be reckoned with here.

And once that reality is centralized, the fact of the Government's failure will or should be factored into this Court's ratiocinations. And one that is done it is doubtful it can be said these seizures and arrests were all supported by probable causes.

ARGUMENT NO. II

GIVEN THE LACK OF PROBABLE CAUSE TO (a) SEIZE, AND/OR (b) TO ARREST, OR (c) TO INTERROGATE TRAVEN BOYER-LETLOW (OUR PETITIONER HERE). THE FACT INEXORABLY SHOWS HIS ARREST, THE SEIZURES (MADE BY THE OFFICERS OF HIS MONEY FOUND IN HIS POSSESSION), CANNOT BE SAID TO SURVIVE MEANIGFUL SCRUTINY; AND SO POSTURED, THIS LACK OF PROBABLE CAUSE IS DISPOSITIVE HERE.

So postured, by the above showings, which are clear enough, do understand this application is **also** cogently backgrounded by various other, indefensible, assailments. Here, for sure, these Agents likewise were given by this Judge his right, as it seems to have been the case, to impose their will on these people – indeed with impunity, which was clear. And, in our judgement, none of our contentions related to them can aptly be assailed by Counsel-Opposite. For sure, because some of the Court's naked assertions have to be noted. For sure some are noteworthy. For here is what the Court also said here. Indeed, before he sent our Petitioner off to prison. This event occurred in a search case where the law is clear and is beyond dispute – indeed in this case. Also, it should be noted, what the District Court actually stated here: in denying our Motion.

Indeed given, as even our Court put it, what results here (are in our favor) are likewise also compelling in our favor. For it was in its wake that our Judge made these statements. For sure, they are and were, likewise compelling in our favor. Indeed, here as well, the Court likewise got more than our mere attention (which it surely got) here. It also got our applause. For sure he got that when he said, indeed with compelling and penetrating thrust, that:

> And I'm not sure, but I -- **I'm not sure he needed probable cause to seize the money**. But I think with all the facts and circumstances in the case, **he did have probable cause to seize the money to make a -- then, a further determination to** determine, you know, whether -- **how this money was obtained**.[3] So --

[3] Clearly, the Court was in left field when it said that. But we say thanks. So, let's be clear. How could there be any consent here. Given **Miranda** by this judge, my friend, there is no way this Court can duplicate the Trial Court's feat here – that is, assume our Court's below.

> And then everything to flow from that. **[Now] I understand Mr. Willis' argument**. But everything that flowed from the conversation, everything I saw, … [as the Court put it] that there was cooperation. **And there was consent** [which is dispositive here].

Transcript, pg. 128. (Emphasis Supplied.) Of course, we know we only have these rank declarations, which is not proof. Yet, arguable they were accepted as being such, by the Court. So postured, clearly we were being told, since the court conceded he was "not sure he [the Agent] needed probable cause" (and we are), it inexorably follows, as we see it, the stop was an arrest, and it was offensive to due process.

Of course, as well, for this Court to even said: I'm not sure he needed "probable cause" to seize the money has to be a **faux pas**. For even the Akron police needed "probable cause to seize ... [this] money" (**Ibid**). Yet, what is being said was not needed here. (**cite my old Akron case**)

Given this case cited above (especially when read in the light of Federal Standards) mandated **State v. Haynes, 25 Ohio St.2d 264, (1971)**. For it made clear especially since Federal Standards (applicable here) for sure include, not only, concepts that emerge for **Beck v. Ohio** but **Miranda**, both, of which were ignored, it inexorably follows these convictions cannot survive meaningful scrutiny. Clearly, that is clear there.

This follows because it is clear that there was no probable cause to arrest, in the wake of the stop, and given the stop was an arrest, the lack of the Agent's **Mirandize** cannot be excused.

ARGUMENT III

GIVEN "TRAVEN BOYER-LETLOW," THE PETITONER HEREIN, WAS SUBJECTED TO, *BOTH*, (a) AN ILLEGAL ARREST AND (b) THE ILLEGAL SEIZURE OF HIS PROPERTY, DESPITE THE LACK OF PROBABLE CAUSE FOR THE OFFICERS TO PROCEED AS THEY DID; IT INEXORABLY FOLLOWS, THE OFFICERS WERE REQUIRED TO *MIRANDIZE* HIM BEFORE HE DID SO. AND, SO POSTURED THEIR FAILURE TO DO SO CANNOT SURVIVE MEANINGFUL SCRUTINY – IN LAW, LOGIC OR COMMONSENSE.

To be sure, as to whether there was consent is a critical issue – here. And to be sure, our thesis is these facts show the **gross** lack of probable cause to seize – indeed (anything). It also shows, in addition to a failure to **Mirandize**, other failures. One other being gross. Indeed, in our judgement, we also have an indelible failure to prove **probable cause** to arrest **and/or** to seize these individuals. Indeed, in order to take, by force, their money. Indeed, a lack of probable cause to arrest, to detain (as was done), but also that the shackling and the other aspects and facets of the inexcusable detentions, which likewise are indefensible.

And, also as to this detention, its duration (as well as, its other facets) and tenue (which is also being assailed as being egregious) our belief is they were also inexcusable. Also, we are further contending the failure of these heroes to reckon (even tokenly with **Missouri v. McNeely, 569 U.S. 141 [2013]**), truly magnifies the intensity of the egregiously flawed efforts of these people. For it is indisputably clear here. For sure, actually it could not be any clearer. This Court's vacillation[4] here which is certainly clearly flawed. Indeed (and at most), given we only have the Trial Court's rank opinions. That the traffic investigation was over even before the use of a dog was even mentioned. What that fact makes compelling here cannot be ignored with impunity – in our judgement.

Given this reality, the question we ask is: how then could the Appellant Judges (who read the above points) have even understood the various nonsensical thrust in the Court's admitted belief – that **Miranda** could even be ignored here. And this arguably is what he was arguing. But all that paled. For the Judge was saying, we suppose, indeed in the wake of the fact "there was

[4] How could these sheer **vacillations**, by the Court, be deemed a rational finding of fact. At most these irrationalities prove the Court was at least indecisive, which is hardly what precise premises are made of (think about it).

[according to him] consent" here (**Ibid**). This is so despite the fact that they had to be figuratively twisting his arm. Given that there are no covenants between sheep and wolves and given the compelling quotes above from the Court: it is clear why we lost our Motion. Indeed, it could not be any clearer this Courts views compelling started.

Indeed, and simply put, these officers (arguably) lacked any basis to even stop these travelers when they did, and they lacked probable cause to **seize** this money **when and where they did**, which is indisputable, it follows, indeed inexorably, that the traffic investigation phase of the traffic stop was over. For sure, that was clear. Indeed, the fact is so clear it is indisputable.

So postured, it could not be any clearer, at least for some of us (a group that does not include the panel [of Judges who saw it otherwise]), or our Court, as well, the State could do what it did here. Simply put, start or open up its second investigation here to determine if there was any drug contraband in the car. And to that end, it seems clear (at least in the Sixth Circuit), once the traffic phase of a stop was over the tickets should have been written out – period. But that did not happen and we deem they crossed the line. And so should this Court reach the same conclusion. It's really that simple.

ARGUMENT IV

GIVEN ONE WHO WAS GRANTED AN APPELLATE BAIL, EVEN FOR DRUG POSSESSIONB OFFENSES, WHOSE FURTHER RELEASE ON BAIL WAS NOT VERBALLY OPPOSED (BY THE GOVERNMENT) HE SHOULD HAVE FURTHER ALLOWED BAIL ABSENT ANY SPECIFIC FINDING BY THE COURT THAT BAIL WAS NOT WARRANTED.

Here we start with a fact that is a given. These convictions are only valid if this Court can validate the District Court's rote thinking, which in fact was expressed. For it is clear the Court's various reasons for denying Bail was not stated. And, given that cannot be right, our belief is the Trial Court's rote denial of bail cannot be defended – no way. And, because the issue was aptly

raised, it exorably follows indeed, inexorably so that the denial of bail here, by the Courts, cannot be defended in law, logic or common sense.

CONCLUSION

Clearly the contentions made in the above arguments are most compelling. Indeed, given the fact these officers lacked any basis here to interfere in anyway with their efforts to fly to the West Coast from Cleveland.

And indeed, had been cleared to go, so postured, absent any basis to arrest (**Beck v. Ohio, 379 U.S. 89 [1964]**) or they were good to go. But here they were prevented from doing so in the wake of the fact these officers arrogated unto themselves the right to abort their Travel plans, as argued above, not only were a plethora of their rights traversed, they were otherwise victimized. This despite the fact that the rights of the very best amongst us are as secure as those of the vilest, most reprehensible are protected. So postured, our request here is that this Court adapt **into** the various arguments we have contended for -- that's, for doing the right thing here.

Let's be very clear here. If only one thing is clear here, and we contend it is clear beyond dispute. We know this to be so (because the Court of Appeals says it is so) in effect. Indeed, had already it nonetheless allowed the original bail – indeed this was done rotely.

With the findings made in the assailed contentions being a given, it could not be any clearer the Trial Court's failure given the lack of an opposition, it only makes sense for this Court should disapprove the failures to appropriately reckon with our quest for bail. For given all Federal informers are registered, their failure to tell us more cannot be defended.

Indeed, we know, in the wake of certain realities, that the bail issue is for sure one that is frivolous. Yet, it was treated as it was. So postured, given the denial of bail was not a given, it is a

fact the issue, as postured for the Court was not appropriately dealt with by the Trial Court – especially since it was not opposed.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on **January 19, 2026**, a copy of the foregoing *Petition For Writ Of Certiorari* was filed electronically. Notice of this filing will be sent via email to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

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