

NO. _____

In The
Supreme Court of the United States

◆

VINCENT FORREST,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

◆

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

◆

PETITION FOR WRIT OF CERTIORARI

◆

Barry Coburn
Coburn & Eisenstein PLLC
1200 G Street, NW
Suite 800
Washington, DC 20005
Tel. (202) 643-9472
Fax (866) 561-9712

Counsel for Vincent Forrest

QUESTIONS PRESENTED

1. Whether there was there was sufficient evidence to sustain bribery and conspiracy to commit bribery convictions, when there was no evidence to show Mr. Forrest acted corruptly.
2. Whether there was sufficient evidence to sustain a false statement conviction, when there was no evidence to show Mr. Forrest acted knowingly.

RULE 14.1(b) CERTIFICATE1. Parties

The parties who appeared before the United States District Court for the District of Columbia and in the United States Court of Appeals for the District of Columbia Circuit in the proceedings which resulted in the judgment from which a writ of certiorari is sought are: Petitioner Vincent Forrest and Respondent the United States of America.

2. Corporate disclosure statement

No corporation was before the Court of Appeals or the District Court below.

3. Related Cases

The underlying case, *United States v. Vincent Forrest*, 21-431 (RDM), was initiated in the United States District Court for the District of Columbia. Final judgement was entered on September 3, 2024. The United States Court of Appeals for the District of Columbia Circuit, No. 24-3107, entered its opinion and judgment on July 17, 2026. No petition for rehearing or rehearing en banc was filed.

TABLE OF CONTENTS

	Page
QUESTIONS PRESENTED.....	i
RULE 14.1(b) CERTIFICATE	ii
TABLE OF AUTHORITIES.....	iv
PETITION FOR WRIT OF CERTIORARI	1
OPINIONS BELOW.....	1
JURISDICTION.....	1
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED	1
STATEMENT OF THE CASE	1
REASONS FOR GRANTING THE PETITION.....	4
1. The evidence was insufficient to prove that Mr. Forrest acted corruptly and knowingly.	4
CONCLUSION	6
APPENDIX:	
APPENDIX A: Unpublished Opinion of The United States Court of Appeals For the District of Columbia Circuit entered July 17, 2026.....	A-1
APPENDIX B: Judgment in a Criminal Case of The United States District Court For the District of Columbia entered September 3, 2024	A-5

TABLE OF AUTHORITIES

	Page(s)
 CASES	
<i>Ingram v. United States</i> , 360 U.S. 672 (1959)	5
<i>Snyder v. United States</i> , 603 U.S. 1 (2024)	4, 5
<i>United States v. Dean</i> , 629 F.3d 257 (D.C. Cir. 2011)	4
<i>United States v. Schaffer</i> , 183 F.3d 833 (D.C. Cir. 1999)	4
<i>United States v. Sun-Diamond Growers of Cal.</i> , 526 U.S. 398 (1999)	4
 CONSTITUTIONAL PROVISIONS	
U.S. Const. amend. V	1
 STATUTES	
18 U.S.C. § 201(b)	2, 4
18 U.S.C. § 371	1
18 U.S.C. § 1001	2, 6
28 U.S.C. § 1254(1)	1

PETITION FOR WRIT OF CERTIORARI

Petitioner Vincent Forrest respectfully petitions for a writ of certiorari to review the judgment of the United States Court of Appeals for the District of Columbia Circuit in this case.

OPINIONS BELOW

The opinion of the United States Court of Appeals for the District of Columbia Circuit appears at Appendix A to the petition and is unpublished.

JURISDICTION

The Court of Appeals entered its judgement on July 17, 2026. The jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

Fifth Amendment of U.S. Constitution:

No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a grand jury, except in cases arising in the land or naval forces, or in the militia, when in actual service in time of war or public danger; nor shall any person be subject for the same offense to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.

STATEMENT OF THE CASE

On June 24, 2021, a grand jury sitting in the District of Columbia returned an indictment charging Mr. Forrest with conspiracy, in violation of 18 U.S.C. § 371;

bribery, in violation of 18 U.S.C. § 201(b); and making a false statement, in violation of 18 U.S.C. § 1001. Following a jury trial that commenced on January 5, 2024, a jury convicted Mr. Forrest on all counts on January 11, 2024. On August 28, 2024, the District Court sentenced Mr. Forrest to twenty months of incarceration, followed by three years of supervised release, to run concurrently as to each count.

Mr. Forrest was a police officer with the D.C. Metropolitan Police Department. At trial, the Government alleged that Mr. Forrest provided names and telephone numbers of individuals involved in traffic accidents to alleged co-conspirator, Raquel DePaula.

At trial, the Government presented testimony from Ms. DePaula. Ms. DePaula testified that she became a “runner,” a person who visits police stations to collect the contact information of people involved in traffic crashes in order to refer them to a lawyer or medical facility, in 2002 and that she routinely obtained the names and phone numbers of people involved in accidents so that she could call them and for compensation, refer them to a personal injury attorney. Ms. DePaula acknowledged her own criminal conduct. She testified that she knew the law required her to wait twenty-one days before viewing accident reports, that she paid various police officers in cash each week. Ms. DePaula testified that she paid Mr. Forrest between \$1,200 and \$1,800 per week for twenty-five names a day, that she paid him in cash because she believed that there would be no trace, and that she communicated through WhatsApp because she knew she was not supposed to be soliciting.

The Government also presented testimony from Agent Richard Erlich of the Metropolitan Police Internal Affairs Division regarding the White Collar Insurance Fraud Amendment Act of 2006 and General Order 401.03, which governs access to traffic crash reports. Agent Erlich testified that PD 251 contains public information and that a PD 252 contains nonpublic information. He did not testify about any training Mr. Forrest received relating to General Order 401.03 or any other relevant order.

Mr. Forrest testified on his own behalf that in his training as a police officer, a PD 251 was a document containing a public narrative of a traffic accident along with the names and phone numbers of those involved, whereas a PD 252 was a restricted document containing sensitive information. Mr. Forrest testified that he understood the information he shared with Ms. DePaula, including names and phone numbers on the PD 251, to be public, and that he therefore did not believe he was doing anything wrong. He testified that he met Ms. DePaula through a close childhood friend, Brandon Murphy, and understood himself to be helping a friend of a friend with her struggling business. Mr. Forrest testified that Ms. DePaula gave him small sums, ranging from \$60 to a few hundred dollars, approximately five times, as a token of gratitude.

Regarding the false-statement charge, the Government relied on statements Mr. Forrest made in an August 19, 2019 interview, in which he told investigators that he did not give out traffic information. Mr. Forrest testified that he understood the investigators to be asking whether he had disclosed private or confidential

information, the kind of information restricted by PD 252, rather than public information within a PD 251, and he answered accordingly.

REASONS FOR GRANTING THE PETITION

1. The evidence was insufficient to prove that Mr. Forrest acted corruptly and knowingly.

It is illegal for a public official to accept anything of value “in return for being influenced in the performance of any official act.” 18 U.S.C. § 201(b). Thus understood, bribery “involves the present giving, promise, or demand of something in return for some action in the future.” *United States v. Schaffer*, 183 F.3d 833, 841 (D.C. Cir. 1999). Bribery must include a “quid pro quo – a specific intent to give or receive something of value in exchange for an official act.” *United States v. Sun-Diamond Growers*, 526 U.S. 398, 404-05 (1999) (emphasis in original); *United States v. Dean*, 629 F.3d 27, 259-60 (D.C. Cir. 2011).

A crucial error by the Government relates to a distinction the Court recently clarified between bribes and gratuities. As the Court observed, “bribes are payments made or agreed to *before* an official act in order to influence the official with respect to that future official act.” *Snyder v. United States*, 603 U.S. 1, 5 (2024). On the other hand, “gratuities are typically payments made to an official *after* an official act as a token of appreciation.” *Id.* “American law generally treats bribes as inherently corrupt and unlawful,” on the other hand, gratuities are “more nuanced” and “might

be innocuous.” *Id.* at 5–6. Thus, “gratuities after the official act are not the same as bribes before the official act.” *Id.* at 6.

As the District Court instructed the jury, the Government was required to prove that “it was the payment or other thing of value that induced the defendant to violate or agree to violate his official duty.” The evidence at trial established the corrupt intent of the payor, Ms. DePaula. It did not establish Mr. Forrest’s intent.

Ms. DePaula testified that she knew her conduct was illegal and described her efforts to avoid detection. She did not testify that she communicated to Mr. Forrest that what they were doing was illegal, and she did not testify that Mr. Forrest understood that what they were doing was illegal. The evidence actually showed that Mr. Forrest understood to himself that he was helping a friend of a friend by sharing information he believed to be public. The Government presented no evidence that Mr. Forrest was trained on the MPD orders he was alleged to have violated. A defendant cannot act “corruptly” if he does not know of, and does not intend to violate, an official duty.

A conspiracy to commit a substantive offense “cannot exist without at least the degree of criminal intent necessary for the substantive offense itself.” *Ingram v. United States*, 360 U.S. 672, 678 (1959). Because the Government failed to prove that Mr. Forrest possessed the corrupt intent required for bribery, it necessarily failed to prove that he knowingly entered a conspiracy with the specific intent to further that offense. Association with Ms. DePaula, who merely testified to her own corrupt intent, is not enough to prove Mr. Forrest’s intent.

Finally, a conviction under 18 U.S.C. § 1001 requires proof that the defendant knowingly and willfully made a statement that he knew to be false. The Government's theory rested on Mr. Forrest's statement, in an August 19, 2019 interview, that he did not give out traffic information. But the evidence showed that Mr. Forrest understood the investigators to be asking about the private, confidential information within PD 252, not the public information within PD 251, and that he answered truthfully within that understanding. On this record, no rational jury could find beyond a reasonable doubt that Mr. Forrest knew his statement was false.

CONCLUSION

For the foregoing reasons, this Court should grant this Petition for Writ of Certiorari.

Date: October 15, 2026

Respectfully submitted,

/s/ Barry Coburn

Barry Coburn
Coburn & Eisenstein PLLC
1200 G Street, NW
Suite 800
Washington, DC 20005
Tel. (202) 643-9472
Fax (866) 561-9712

Counsel for Vincent Forrest
Appointed under the Criminal Justice Act

CERTIFICATE OF COMPLIANCE

I certify the following:

1. This petition complies with the type-volume limitation of Rule 33.1(h) because:

The word count of this brief is 1,416 words.

2. This petition complies with the typeface requirements and the type style requirements of Rule 33.2 because:

This brief has been prepared in a proportionally spaced typeface using Microsoft Word, Century Schoolbook, 12 point.

/s/ *Barry Coburn*
Barry Coburn