

Glenn Doolin #1023173
SPDC Box 208
Indian Springs NV 89070
(Petitioner Proper Person).

In the Supreme Court
of the State of Nevada

FILED

DEC 19 2017

ELIZABETH A. BROWN
CLERK OF SUPREME COURT
BY [Signature]
DEPUTY CLERK

Glenn Doolin,
Petitioner, Appellant ~

Case No: 73698

(District Court Case No: A-16-745766-W).

vs~

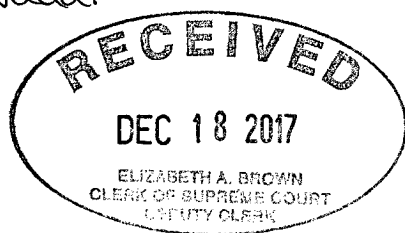
The State of Nevada,
Nevada Department of Corrections,
et al

"Appellants Opening Brief"

(pursuant to N.R.A.P. 28(a) ~)

Respondents.

Comes now the Petitioner Glenn Doolin, in Proper Person, with the assistance of an inmate Law Clerk, in the above entitled pleading, "Appellants Opening Brief". This Appeal brief is made pursuant to N.R.A.P. 28(a), due to the Eighth Judicial District Courts Denial of Petitioners writ of Habeas Corpus filed on October 27th 2016. By the District Courts Denial for relief, the issues presented are ripe for this Courts review under a "De Novo" Standard. This Brief is provided in Good faith, in pursuit of Equal and Fair Treatment of the laws of the State of Nevada.



17-43854

Background

On June 15th 2012, the Petitioner (Here in after "Dodin") was arrested and charged with Count One: Grand Larceny - auto; NRS 205.228; 193.130; and Count Two: Possession of Burglary Tools; NRS 205.080. Both felony counts are Category C felonies. On January 9th 2013 Dodin entered guilty pleas pursuant to plea deal negotiations to both Counts one and Two.

On April 10th 2013, Dodin was sentenced by the Eighth Judicial District Court and therefore adjudged under Count one under the Habitual Criminal Statute pursuant to NRS 207.010 (a). The Court pronounced sentence as a minimum term of Sixty (60) months and a maximum term of One Hundred Fifty (150) months. The Judgement of Conviction was signed on April 24th 2013, and was filed on April 26th 2013.

On October 27th 2016, Dodin filed a Petition for writ of Habeas Corpus, challenging the N.D.C.'s calculation and application of Statutory Goodtime Credits earned pursuant to NRS 209.4465, and with the Nevada Supreme Courts findings of and under "Vorselewite vs. Legend, No 66159, 2015 W2 3936827 as far as this Court determined and found the two styles of sentence structures of parole eligibility terms and those without. Dodin challenged that as convicted of a Category C minimum maximum term of imprisonment without a parole eligibility term to serve first, then the NDCC should apply statutory credits towards his minimum term. Dodin also challenged that as an Habitual offender that this status does not Bar credit application towards his minimum term of incarceration, providing the N.D.C.'s formula of credit application.

On July 17th 2017, The Attorney Generals office filed its response, thus arguing that Dodin is not entitled to good time deductions from his parole eligibility date under NRS 209.4465, and that "Vorselewite" is inapplicable. On August 11th 2017, Dodin filed his opposition to the Response, soon after the Eighth Judicial District Court entered its Denial (Decision and Order) for Dodin to receive Habeas Corpus relief.

Dodlin entered a timely Notice of Appeal before the entry of the Denial of Habeas relief on August 3rd 2017. Once the Courts entry of order was made on October 12th 2017, As such this appeal is properly before this Court, and the Nevada Supreme Court should hold jurisdiction of this appeal, as Statute Interpretation is the core issue that surrounds this appeal, and an De Novo review of such is needed.

Issues on Appeal.

Dodlins original petition for writ of Habeas Corpus supplies his ground for relief that concerns the Statute interpretation of NRS 209.4465 and how it is to be applied and enforced upon Dodlins terms of incarceration. Dodlins ground was filed on October 27th 2016, and what is deeply intriguing here, is that the Nevada Supreme Court has already recognized this issues importance, yet did not consider it.

In the Unpublished Case of "Bayot v. I. Baca warden, 2017 Nev. App. Unpub. Lexis 176", the Nevada Supreme Court provided in footnote #2,

"... Bayot was convicted of 11 counts of Forgery and one Count of Conspiracy to commit forgery and was sentenced under the Small Habitual criminal enhancement. NRS 205.090 Categorizes forgery as a Category D felony, But NRS 207.010 (1)(a) states defendants who are adjudicated habitual criminals under the small habitual criminal enhancement, "shall be punished for a Category B felony". Accordingly Bayot was convicted of category D felonies for his forgery convictions but is being punished for Category B felonies pursuant to the small Habitual criminal enhancement ... ,

////

... (Footnote #2 continued), - "We note NRS 209.4465(2)(d) states that credits do not apply to the minimum terms of offenders that have "been Convicted of [a] Category A or B felony". The Nevada Supreme Court had previously held that the habitual criminal enhancement does not constitute a separate crime, but rather increased punishment. [See *Hollander v. Warden*, 26 Nev. 369, 373, 468 P.2d 990, 992 (1970); *Howard v. State*, 422 P.2d 548 (1967); *Lisby v. State*, 414 P.2d 592 (1966).] Because the credit application limitations in NRS 209.4465(2)(d) apply to those "Convicted" of category A or B felonies, it is not clear that such restrictions also apply to those convicted of lesser felonies who receive enhanced punishments due to their status as habitual criminals. However, because this issue was not specifically raised in this matter, we decline to consider it in this appeal. - " (end of Footnote #2).

Petitioner Doolin presents this exact same argument within his petition for writ of Habeas Corpus and now on appeal to the Supreme Court, as the Eighth Jud. Dist. Ct. failed to correctly interpret and apply the proper language used to define a conviction from a punishment and or enhancement status and abused its discretion by failing to apply the proper category of conviction towards Doolin's sentence, as the Eighth Jud. Dist. Ct. incorrectly found that Doolin is sentenced for a category B felony committed on/in 2013. (Court's Order of Denial pg 2 lns 21-27), further Doolin is not serving a sentence based upon a category B felony.

As such, Doolin now presents three grounds for this Court's review on appeal. 1), Doolin is entitled to statutory credits earned under NRS 209.4465 to be applied to Doolin's minimum term of incarceration, as he has been convicted of a Category C felony, which declares an Minimum/Maximum term without an parole eligibility term to serve first.

2.) The Eighth Judicial District Court Abused its Discretion by applying the incorrect category of felony conviction towards Doolin's sentence structure, therefore denying the correct application of NRS 209.4465 as provided in the language of the State legislature.

3). That the "Category of punishment" is Not an Conviction of an Category felony, the clear language of interacting NRS Statutes allows for Habitual offenders, under non-parole eligibility terms, to receive credit based upon the primary conviction;

Petitioner Doolin also incorporates his grand for relief contained in his petition for writ of Habeas Corpus herein now in this appeal, as the claim is again the same that this Court has acknowledged exists and is relevant. Doolin now presents his grounds for relief.

A

Ground One

Petitioner Doolin has been Denied his Constitutional Right to Due Process and Equal Protection of the Law guaranteed by the Fifth and Fourteenth Amendments to the United States Constitution by the Acts of the Nevada Department of Corrections (Respondents).

Doolin was sentenced and adjudged guilty by the Eighth Jud. Dist. Ct. on April 10th 2013, to the charges of Count one: Grand larceny - auto; NRS 205.228(2), an Category C felony. The Petitioner was then sentenced under the Small Habitual Criminal Statute, NRS 207.010 (a), to a minimum term of not less than (60) Sixty months and a term of not more than (150) One Hundred Fifty months.

As the Petitioner was found guilty of an Category C felony, the petitioner is allowed to receive credit days towards his minimum sentence structure pursuant to NRS 209.4465. The Nevada Department of Corrections (N.D.C.), as the Petitioner's Custodian, has Denied the proper application of NRS 209.4465, and has therefore denied Doolin Equal Protection of the Law enacted by the State of Nevada Legislature without Due Process of Law.

The Petitioner was sentenced pursuant to NRS 207.010(a), which provides for a minimum/Maximum term as an sentence structure. NRS 207.010(a) provides a Penalty of a minimum term of not less than Five (5) years and a maximum term of not more than Twenty (20) years. As such the Petitioner was sentenced under one of two forms/styles used in the State of Nevada. The First is expressed under the punishment clause of an NRS Statute as:

"... Be punished by imprisonment in the State prison for a minimum term of not less than [x] years, and an maximum term of not more than [y] years ..."

The Second style of sentence structure used in Nevada is an "Parole Eligibility" sentence term, which is expressed as:

"... Be punished by imprisonment for an Maximum term of [x] years with the Eligibility of Parole when a minimum of [y] years has been served..."

Petitioner Declin is clearly sentenced under the first sentence/punishment Clause construction, as No language of "Parole Eligibility" is contained in his punishment clause, and as such meets the criteria to be Granted, earned statutory credit application under NRS 209.4465 towards his minimum sentenced term. Here, the NDC has denied this application, though the Nevada Legislature has declared otherwise.

The provisions and enactment of NRS 207.010 to NRS 207.016 inclusive, were created by the State Legislature, are to be seen and used as an "Enhancement" to the original or Base offense found guilty of and is not seen as or expressed as an "Separate" offense to be convicted of as an alleged crime. [See "Crotcher v. Eighth Jud Dist. Ct.", 903 P.2d 823 (1995); and "Parkerson v. State", 678 P.2d 1155, (1984)]. The Courts do not distinguish between the "types" of crime committed when declaring the Habitual criminal enhancement as an sentence ["Arsiakis v. State", 843 P.2d 800 (1992)], yet is viewed as mitigating evidence per-mitted at the time of sentencing.

Here, the Petitioner was found guilty of an Category C felony (The Conviction), yet recieved as an punishment for such violation an Category B punishment. The Petitioner was not found guilty or convicted of a Category B felony. A status and enhancement can not be a factor when applying NRS 209.4465 towards the Petitioners sentence structure, especially when the Habitual criminal enhancement punishment is only warranted for a defendants status as an recidivist, Not for an convicted offenders conduct under the base offense charged. An Habitual Criminal proceeding Does Not charge an seperate offense, it is only used to increase punishment if found true, [Quoting "Howard v. State", 422 P.2d 548 (1967)"], A such, an Category B punishment is Not an Category B conviction.

The status as an Habitual offender does not increase punishment of the "principal offense" for which a defendant is on trial for [quoting] Howard v. State, 422 P.2d 548 (1967); and Odums v. State, 714 P.2d 568 (1986)], but issued to those who are considered as an recidivist. This is true as the State Legislature did not authorize punishments for both the primary offense and the Habitual Criminal status. The legislature has given evidence that the Habitual Criminal status is not substantive offenses (separate as an status). The Petitioner has established that being adjudged as an Habitual offender, which is only a Status and not an separate offense, the Petitioner is only convicted of the alleged conduct under an Category C felony.

As the Petitioner was convicted of an Category C felony, as the primary offense the provisions of NRS 209.4465, allowing the application of earned statutory credits and or work credits to be applied to the minimum term of Imprisonment is allowed and must be applied by the NDOC, yet since the year 2007 the offender management Division of the NDOC has failed to follow statute mandates as the Nevada legislature intended by enacting the Amendments of NRS 209.4465 under Assembly Bill 510 (A.B. 510). The offender Management Division (O.M.D) has created its own flawed interpretation of NRS 209.4465 and its application, which again Denies the Petitioner Equal Protection of the law, As those with Category C felonies alone do receive such proper application and equal treatment.

The provisions of NRS 209.4465 sub-section 1 reads as follows:

"... 1) An offender who is sentenced to prison for a Crime Committed on or after July 17th 1997, who has no serious infraction of the regulations of the Department, the terms and conditions of his or her residential confinement, or the laws of the State recorded against the offender, and who performs in a faithful, orderly and peaceable manner the duties assigned to the offender - Must be allowed:

... A deduction of 20 days from his or her sentence for each month the offender serves.

This legislative mandate gives an directive to the N.D.O.C. to Award credit to an offender, it is subsection 7 that gives the directive of where the credit should be applied upon an offenders sentence terms.

NRS 209.4465 sub-section 7 dictates the application of credits earned under sub-section 1 and reads as follows:

"... 7) Except as otherwise provided in subsection 8 and 9, credits earned pursuant to this section:

- A) Must be deducted from the maximum term or the maximum aggregate term imposed by the sentence as applicable, and;
- B). Apply to Eligibility for parole unless the offender was sentenced pursuant to an statute which specifies a minimum sentence that must be served before a person becomes eligible for parole...."

NRS 209.4465 (7)(b) mandates the application of earned credits towards the minimum sentence term of the Petitioner's sentence structure, as the Petitioner does not have a sentence structure that contains or requires a minimum term that first must be served to become parole eligible. As such, credits earned because the Petitioner is "An offender sentenced to prison for a Crime Committed on or after July 17th 1997 (quoting NRS 209.4465(1)), the Petitioner's credits earned must be applied to the minimum term of incarceration, here a minimum term of Sixty (60) months. The Crime Committed, as alleged and convicted of, by the Petitioner is a Non-Violent Category C felony pursuant to NRS 205.228 Grand larceny - auto.

NRS 209.4465 sub-section 8 application criteria of earned credits does not apply to the Petitioner, nor pronounce the denial of credit application towards the Petitioner's minimum sentence structure, as the criteria under sub-section 8 does not list the Petitioner's category of Convicted offense, as an offense that only receives credit application from the maximum sentence structure. NRS 209.4465 8 reads as follows:

"... 8). credits earned pursuant to this section by an offender who has not been convicted of:

- a). Any crime that is punishable as a felony involving the use of or threatened use of force or violence against the victim;
- b). A sexual offense that is punishable as a felony;
- c). A violation of NRS 484C.110; 484C.120; 484C.130 or 484C.430 that is punishable as an felony or;
- d) A category A or B felony;

..... (NRS 209.4465 (8) continued) . . Apply to eligibility for parole and as otherwise provided in subsection 9 Must Be deducted from the Minimum term or minimum aggregate term imposed by the sentence, as applicable, until the offender becomes eligible for parole and Must Be deducted from the maximum term or maximum aggregate term imposed by the sentence as applicable . . . " .

This NRS Sub-section (8) mandates the application of earned credits to be applied to the minimum term and maximum term of imprisonment as the Petitioner Does Not have any of the listed elements contained in subsection 8 (a), (b), (c), (d), which would preclude the application of credits towards the minimum sentence. NRS 209.4465 is clear language that it is the "Conviction" that determines the application of credits allows Petitioner to earn such.

Here, the O.M.D has stated under its memorandum issued by Mr. Rex Reed On January 3rd 2008, that an expiration date is an Conditional date, and a person will know their actual date of release when the Computer "locks" such in (10) Ten days before release. The O.M.D. department has also provided in this memorandum that "Inmates earning good time, work time and meritorious credits constantly move their discharge dates". (This position assumes that all applied and earned Credit must be applied to the Maximum term an offender is sentenced to serve). The O.M.D has now acknowledged by this memorandum that earning credits is an actual topic that determines a person / offenders release date, a Substantial Liberty Interest.

This memorandum further portrays that O.M.D "assumes" all dates, and these dates are assumed by a computer, which is only a "Guide" and maybe even considered a fictional date. This Computer assumption causes the intended mandates and provisions of the Nevada Legislature "Null and Void" as a "given that the actual discharge date is unknown for most of an offenders prison term", (Exhibit A attached), as different Custodies and Sentences can Earn (credits) at different rates. No where does the Nevada Legislature provide the N.D.C. with the authority under NRS 209.4465 to apply credits to offenders at [different rates] in different Custodies or Sentences, as all offenders in the custody of the NDOC earn [20] Twenty days each month the offender serves for being Committed to the NDOC for a Crime the offender has been Convicted of.

The application of NRS 209.4465 by the Nevada Department of Corrections and the O.M.D. department which oversees the offenders sentence and imprisonment conditions is clearly in direct violation of the Law of the State of Nevada and the protections of said law to be equally and fairly applied, further "Common Sense" would severely question the calculation process of an offenders sentence structure and the recording of such credits earned by the offender, that a person would be shocked to learn their sons or daughters time incarcerated is Assumed by a Computer that "Counts the chickens before they hatch" method. (Credits earned are assumed to be earned by an offender Before he earns such to determine the fictional expiration date of the offender).

The B.D.C.C. has deliberately overstepped their authority to interpret the NRS statute (209.4465) as they deem appropriate and correct. The Petitioner is entitled to the correct application of the law as was enacted by the State Legislature, especially when a persons freedom and release from confinement is at stake and being delayed beyond the punishment that was ordered to be served by the Eighth Judicial District Court. Clearly this Courts DeNovo review is warranted and needed to protect the interests of the offender before further injustice occurs.

A statutes interpretation is a question of Law that Must be reviewed DeNovo, [State of Nevada, v. Catano, 102 P.3d 588 (2004)]. Here, the Court has the duty to interpret the provisions, which are under an "Common Statutory Scheme" "Harmoniously" with one another to avoid Absurd results. [Torreblanca v. Kesmetis, 178 P.3d 716 (2008)]. The Court is now presented with a question of Law, which affects the freedom of the offender, that being "Does the Petitioner receive credits under NRS 209.4465, as he is and was convicted of an Category non-violent C felony, as the punishment he is under is not the convicted crime of substantial offense?"; And does the current calculation of credits earned by an offender currently in place by the NDOC violate the Liberty Interests and Due Process of Law? as an offender has no choice but to rely on and upon the Computer assumption of an fictional release date projected until about [10] Ten days before he could be released. The answer is yes to both questions, as an offender has no ability to keep "Checks and Balances" at all times upon the authority to keep custody of an offender and his release date, from such custody if the offenders calculation is based upon the NRS is Incorrect, as the authority Doesnt comply with such NRS mandate.

No part of an statute should be rendered Nuyatory, nor any language turned to mere surplusage, if such consequences can be avoided, [quoting "Independent American Party v. Law, 880 P.2d 1391 (1994)"]. As the Statute governing the Habitual criminal Statute is A Status, and Not a Convictable crime or offense, it can Not be used to determine a application of an NRS that contains Clear words, its application towards an offender who was Sentenced to prison for a Crime Committed, and Conviction is the Mandated enforcement of NRS 209.4465 Not the punishment.

The alleged crime committed by the Petitioner is an Non-violent Category C felony under NRS 205.228, The Language used in these NRS statutes proves that the Petitioner Has suffered an injustice by being denied the correct and mandated application of a statute that concerns his release from confinement of the NSCC. The Respondents can not continue to violate and ignore the Nevada Legislature and apply the law against its intent, mandate and authority. This violating the Due Process and Equal Protection clauses of the Law, under the United States Constitution, the Fifth and Fourteenth amendment, as it is now a Miscarriage of justice.

A

Ground Two

The Eighth Judicial District Court Abused its Discretion by applying the Incorrect Category of Felony Conviction towards Doolins Sentence Structure, therefore Denying the Correct application of NRS 209.4465 as provided in the language of the State Legislature, in violation of Petitioners Right to Due Process and Equal Protection of the law under the Fifth and Fourteenth amendments to the United States Constitution.

. (A) .

The Eighth Jud. Dist. Ct. in its order of October 9th 2017 applied the incorrect legal theory and classification of felony against the Petitioner which allowed the Court to Deny Petitioner Doolin an Liberty Interest provided by the State Legislature. The Court found on pg. 2 Ln 21-27 that Petitioner Doolin was sentenced pursuant to a Category B felony. This Belief is incorrect. Petitioner was sentenced pursuant to a Category B "punishment clause" as an Habitual Criminal status.

The Court is aware that a Punishment/Sentence Clause is Not found to be, nor can be seen as the equal of a Conviction Clause of an NRS statute. NRS 193.130 "Categories and punishments of felonies" provides evidence of this issue, and States that it is the Conviction that determines the duration of punishment as out-lined by the Legislature.

NRS 193.130 ... (1) Except when a person is Convicted of a Category A felony, and except as otherwise provided by Specific Statute, A Person Convicted of a felony shall be sentenced to a minimum term and a maximum term of imprisonment which must be within the limits prescribed by the applicable statute, unless the statute in force at the time of commission of the felony prescribed a different penalty. The minimum term of imprisonment that may be imposed must not exceed 40 percent of the maximum term imposed. . . .

With this NRS provision, it is the Conviction of a "felony Commission" that allows for a Sentence of imprisonment to be imposed. Here, as the Court is aware, a offender Can Not Commit the felony crime of a "Habitual Criminal".

Next, NRS 207.010 to NRS 207.012 inclusive provides the definition and punishment of Habitual Criminals, mainly NRS 207.010 states:

... 1.) Unless the person is prosecuted pursuant to NRS 207.012 or 207.014, a person convicted in this state of:

(a) Any felony, who has previously been two times convicted, whether in this state or elsewhere, of any crime which under the laws of the situs of the crime or of this state would amount to a felony is a habitual criminal and shall be punished for a Category B felony by imprisonment in the State prison for a minimum term of not less than 3 years and a maximum term of not more than 20 years.

This NRS subsection promotes that a person who was previously convicted of a crime shall [shall] be punished for a Category B felony, thus under NRS 193.130 (2)(b) states:

... "A category B felony is a felony for which the minimum term of imprisonment in the State prison that may be imposed is not less than 1 year and the maximum term of imprisonment that may be imposed is not more than 20 years, as provided by specific statute..."

As such NRS 193.130 (2)(b) defines the punishment clause for a Category B felony conviction, and NRS 207.010(1)(a) adopts this clause and states a person shall be punished for a Category B felony, which is a minimum term of 1 (one) year and a maximum term of not more than 20 years [which NRS 207.010 allows for]. Being punished for a category felony is not an conviction for that style of felony. Quoting "Crutcher v. Eighth Judicial Dist. Court, 903 P2d 823 (1995)", "...

Because the Habitual criminal enhancement affects the Sentencing stage of proceedings, the Legislature clearly intended that it be charged before sentencing, thus this statute permits the habitual criminal enhancement to be charged after conviction, but still requires that it be charged before sentencing..."

As "Crutcher" supra states, the Habitual criminal enhancement affects the Sentencing stage, it therefore can not affect the Guilt / conviction stage.

with the Habitual criminal enhancement only affecting the sentencing stage, then there is no conduct, or criminal action to be proven by the State that an offender did indeed do by his own actions, thus a conviction of a Defined criminal conduct can not be achieved for purposes of a Criminal Conviction under NRS 207.010. Further the Defined conduct to be found to charge an offender as an habitual offender, a person must have been Convicted previously [of] two times. "It is not a Separate offense to be a Habitual criminal, but a Status, [quoting "Howard v. State, 422 P.2d 548 (1967) ; and Parkerson v. State, 678 P.2d 1155 (1984)"] , and therefore a person can not be Convicted of a Status. In "Parkerson" supra the Court found that a Habitual Criminal status/proceeding is only conducted Only to determine whether an enhancement of punishment is warranted for a defendants status as a "Recidivist." Further in "Parkerson" supra held that "Although an allegation that a defendant falls within the purview of the habitual criminal statute is typically included in the charging document, such an allegation Does Not charge a separate, substantive criminal offense. -".

Therefore the Eighth Judicial Dist. Ct. improperly applied a Status finding as an conviction, with holding the proper application of statutory credits under NRS 209.4465 for the Petitioners primary conviction, of an category C felony. Thus violating Petitioners Right to Due Process and Equal Protection of the law under the Fifth and Fourteenth amendments to the United States Constitution.

A.

Conclusion

The Petitioner has put forth his grounds for relief under this appeal from the Eighth District Court's order denying Habeas relief, which is an abuse of discretion and challenged herein.

The Petitioner is allowed under the clear statutory language to receive credits pursuant to NRS 209.4465 towards his primary offense and conviction category C felony minimum term of incarceration, the WDOC has denied such clear mandate, and therefore the Petitioner's prayers are for this court to intercede and order such to be given towards his minimum term.

Respectfully submitted this 12th day of December 2017.

Glenn Dodin

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CERTIFICATE OF SERVICE BY MAILING

I, Glenn Declin, hereby certify, pursuant to NRCP 5(b), that on this
day of December, 2017, I mailed a true and correct copy of the foregoing, "Appellants
Opening Brief"
by placing document in a sealed pre-postage paid envelope and deposited said envelope in the
United State Mail addressed to the following:

Nevada Supreme Court
201 South Carson St.
Suite 201
Carson City NV 89701

CC:FILE

DATED: this 12th day of December, 2017.

Glenn Declin
Petitioner / In Propria Personam # 1023173
Post Office Box 208, S.D.C.C.
Indian Springs, Nevada 89018
IN FORMA PAUPERIS:

Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding Appellants

Opening Brief
(Title of Document)

filed in District Court Case number 73698/A-16-745766-W

☒ Does not contain the social security number of any person.

-OR-

☐ Contains the social security number of a person as required by:

A. A specific state or federal law, to wit:

(State specific law)

-Or-

B. For the administration of a public program or for an application for a federal or state grant.

X. Donn Dade
Signature

X Doc. 12-2017
Date

x Glenn Dodlin
Print Name

Relitigious Appellant
Title