

No. 24-5854

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IN THE
SUPREME COURT OF THE UNITED STATES

Tabitha Ward — PETITIONER
(Your Name)

vs.

New York Police Department Headquarters License Division — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

New York State Court of Appeals
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Tabitha Ward
(Your Name)

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I. QUESTIONS PRESENTED

The Article 78 Proceeding decision was rendered based on willful false statements submitted to the court by The New York Police Department Headquarters License Division. After providing accurate and documented proof taken from the Answer and Verified Exhibits rendering each allegation as indeed false, should the Honorable Judge John J. Kelley have amended his decision?

The Supreme Court of the State of New York Appellate Division, First Judicial Department, denied the firearms license after receiving documented proof taken from the Answer and Verified Exhibits that each willful false statement submitted to The Article 78 Proceeding was indeed false; and The Supreme Court of the State of New York Appellate Division, First Judicial Department, disregarded the federal stipulations of persons prohibited from possessing firearms; and The Supreme Court of the State of New York Appellate Division, First Judicial Department, blatantly ignored the Bruen Ruling rendered by The Supreme Court of the United States in June 23, 2022, by unanimously deciding with The Article 78 Proceeding denial. Did the Supreme Court of the State of New York Appellate Division, First Judicial Department, deny my 2nd Amendment right without State or Federal legal cause?

The New York State Court of Appeals decided with The Article 78 Proceeding and The Supreme Court of the State of New York Appellate Division, First Judicial Department, without requiring documentation to support any of the

willful false statements from The New York Police Department Headquarters License Division to include a criminal convictions record. The New York State Court of Appeals disregarded the federal stipulations of persons prohibited from possessing firearms, additionally The New York State Court of Appeals ignored the Bruen Ruling rendered by The Supreme Court of the United States in June 23, 2022, and thereby repeating the unsubstantiated decisions of The Article 78 Proceeding and The Supreme Court of the State of New York Appellate Division, First Judicial Department. Did the New York State Court of Appeals deny my 2nd Amendment right without State or Federal legal cause?

The Sixth Amendment provides that in all criminal prosecutions, the accused shall enjoy the right to be confronted with the witnesses against him; the right to confrontation includes the right of a military accused to cross-examine adverse witnesses. Moral character accusations were listed in the denials and dismissals of my firearms license application, the appeal, the Article 78 Proceeding, The Supreme Court of the State of New York Appellate Division, First Judicial Department, and the New York State Court of Appeals; and although the Sixth Amendment is limited to criminal prosecutions, should it apply with moral character accusations in civil proceedings as it relates to the violation(s) of other Constitution Amendments, such as the Second Amendment?

LIST OF PARTIES

- All parties appear in the caption of the case on the cover page.
- All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

RELATED CASES

Tabitha Ward v. New York Police Department Headquarters License Division, Index No. 100881/2021
CPLR Article 78 Proceeding. Judgment entered December 20, 2021.

Tabitha Ward v. The New York Police Department Headquarters License Division, Index No. 100881/21
Case No. 2022-04125 Supreme Court of the State of New York Appellate Division, First Judicial Department
Judgment entered October 5, 2023.

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Appendix B

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Appendix C

Appendix - C consists of documents, decisions, motions, and additional paperwork submitted to The New York Police Department Headquarters License Division c/o City of New York Law Department; The New York State Court of Appeals; and The New York Supreme Court Appellate Division, 1st. Department. Additionally, Appendix C includes the motion decision from The New York State Court of Appeals.

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Appendix D

Appendix - D consists of two jump drive labeled WardvNYPD and WardvNYPD2. The information on both jump drives is the same. The contents of Appendix D are available for upload upon request; however, the Writ of Certiorari, and the Amicus Curiae with Joint Appendix submitted to the Supreme Court of the United States in December 2022, cannot be fully realized without the information in Appendix D. I am *in forma pauperis* and the contents of Appendix D are too many to print along with doorbell camera videos and phone pictures and videos which cannot be printed. On August 20, 2024, I spoke with Rashonda Garner and she told me that only bar attorneys can upload electronic data to the SCOTUS database, therefore as *pro se*, I can never upload to the database. The contents on the jump drives can be used as reference and can be viewed on other computers. Available upon request.

The folders uploaded on both jump drives are:

- Miscellaneous Letters – 19 items.
- Secret Service – 14 items.
- Federal Bureau of Investigation – 38 items.
- Writ of Certiorari – 14 items and 1 folder – 11 items.
- Appendix - A – 98 items.
- Appendix - B – 1st. Department – 100 items.
- Appendix - C – Court of Appeals – 25 items.
- The Monarch the Institution of Sovereign – 147 items.
- Amicus Curiae – SCOTUS – 142 items.
- White House Letters – 82 items.
- Doorbell Camera Videos and Phone Pictures and Videos – 13 folders consisting of hundreds of videos and many pictures.
- Letter to the SCOTUS Clerks Office – 1 letter.

The programs used with the information uploaded on both drives are MS Word and Adobe Acrobat, the videos can be viewed by using the MP4 video or Windows Media Player.

IV. TABLE OF AUTHORITIES

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IN THE
SUPREME COURT OF THE UNITED STATES
PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

V OPINIONS BELOW

For cases from **federal courts**:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

- reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

- reported at _____; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

For cases from **state courts**:

The opinion of the highest state court to review the merits appears at Appendix C to the petition and is page 72-

- reported at The New York State Court of Appeals; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

The opinion of the The New York Supreme Court Appellate Division, First Department court appears at Appendix C to the petition and is pages 38-39 and page 6

- reported at The New York Supreme Court Appellate Division, First Department; or,
 has been designated for publication but is not yet reported; or,
 is unpublished.

VI JURISDICTION

For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

No petition for rehearing was timely filed in my case.

A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A .

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

For cases from **state courts**:

June 18, 2024

The date on which the highest state court decided my case was _____.
A copy of that decision appears at Appendix C - page 72

A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A .

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

VII. Constitutional And Statutory Provisions Involved

United States Constitution.....3, 21
Amendment II:

A well-regulated Militia, being necessary to the security of a Free State, the right of the people to keep and bear Arms, shall not be infringed.

Supreme Court of the United States..... 3,4,7,9,11,12,21,22,32,33,38
New York State Rifle & Pistol Association, Inc.
v. Bruen, 597 U.S. 1 (2022).

In a 6-3 decision, the Supreme Court ruled that New York's law was unconstitutional and that the ability to carry a pistol in public was a constitutional right guaranteed by the Second Amendment.

TITLE 18, UNITED STATES CODE, SECTION 922g.....

- Anyone under indictment for a crime for which they could be imprisoned for more than one year.
- Anyone convicted of a crime for which they could have been imprisoned for more than one year.
- Anyone who is an unlawful user of marijuana, narcotics or any controlled substance.
- Anyone who has been adjudicated mentally defective or involuntarily committed to a mental institution.
- Anyone dishonorable discharged from the Armed Forces.
- Anyone in The United States illegally.
- Anyone subject to a court order restraining them from harassing, stalking or threatening an intimate partner or child of a partner.
- Anyone convicted of a misdemeanor crime of domestic violence.

United States Constitution..... Questions Presented
Amendment VI:

In all criminal prosecutions, the accused shall enjoy the right to be confronted with the witnesses against him; the right to confrontation includes the right of a military accused to cross-examine adverse witnesses.

Supreme Court of the United States..... Cover letter
Donald J. Trump v. United States 603 U.S (2024)

VIII. Statement Of The Case

The Article 78 Proceeding, The New York Supreme Court Appellate Division, 1st. Department, and The New York State Court of Appeals sided with The New

York Police Department Headquarters Firearms License Division after the petitioner provided documented proof that the willful false statements submitted by The New York Police Department Headquarters Firearms License Division were indeed false and unfounded. Additionally, The New York Supreme Court Appellate Division, 1st. Department, and The New York State Court of Appeals concurred with The New York Police Department Headquarters Firearms License Division as it violated its own rules by disregarding the TITLE 18, UNITED STATES CODE, SECTION 922gof persons prohibited from possessing firearms, and blatantly ignored the Bruen vs. NYPD ruling. (New York State Rifle & Pistol Association, Inc. v. Bruen, 597 U.S. 1 (2022); Appendix B - 1st. Department Motion to Appeal to Court of Appeals pgs. 38-39.; Appendix B - Brief Submitted to 1st. Department pages 98)

1. Article 78 Proceeding

After the denial of the appeal for a firearms license with The New York Police Department Headquarters Firearms License Division, I promptly submitted my case to the Article 78 Proceeding. I submitted the necessary documentation in a timely manner in July 2021, and I received a bounded copy of the Answer and Verified Exhibits in October 2021; and I waited for my court hearing date to present my case. In December 2021, the Honorable John J. Kelley denied the firearms license due to willful false statements submitted by The New York Police Department Headquarters Firearms License Division, however, I did not receive any inclination that these willful false statements were submitted to the

Article 78 Proceeding because, I was not permitted a full evidentiary hearing. Additionally, the Article 78 Proceeding did not require any documentation to support the willful false statements because I was able to categorically dispute each willful false statement by pulling the information directly and only from the Answer and Verified Exhibits. (Appendix B- Brief Submitted to 1st. Department, pages 49 –54, and pages 56 – 87, pages 89 – 100.)

I submit that each false statement was *willful* because it was The New York Police Department Headquarters Firearms License Division that put together the Answer and Verified Exhibits, and they knew firsthand what is in the Answer and Verified Exhibits. (Appendix B – Brief Submitted to the 1st. Department, pages 56-57; Amicus Curiae - SCOTUS – Verified Answer with Exhibits, pages 1-2.)

The decision was signed by the Honorable John J. Kelley on December 20, 2021; the decision was filed in The New York City County Clerk's Office in February 2022, and I received the decision via the United States Postal Service in March 2022. I filed for an appeal in March 2022 and submitted with the appeal documentation that proves each willful false statement was indeed false, and upon verification, it is my opinion that the Article 78 Proceeding Judge should have amended his decision, because the denial was based solely upon the willful false statements as submitted by The New York Police Department Headquarters Firearms License Division. (Appendix B- Brief Submitted to 1st. Department pages 49-54.)

2. The New York Supreme Court Appellate Division, First Department

Prior to the court hearing on September 14, 2023, the New York Police Department attorney Kevin Collins with the New York City Law Department was replaced by Tahirih M. Sadrieh who is also with the New York City Law Department, and in February 2023, I agreed to the adjournment from March 2023 to May 2023 with Tahirih M. Sadrieh. In March 2023 the attorney Tahirih M. Sadrieh, requested a *second* adjournment from May 2023 to September 2023, and the reasons given were that the case was not filed electronically so the attorney would have to go to the County Clerk's Office and manually retrieve the documentations – instead of retrieving the files from co-counsel Kevin Collins of the same department and location. I did not consent to the *second* adjournment and the attorney filed the adjournment appeal with the Supreme Court of the State of New York Appellate Division, 1st. Department. On March 10, 2023 the Supreme Court of the State of New York Appellate Division, 1st. Department approved the *second* adjournment. (Upload upon request- Appendix B- Agreement to May 2023 Adjournment with Attorney Number 2, page 1. Upload upon request- Appendix B- Attorney Number 2 September 2023 Adjournment and 1st. Department Granted.)

During the trial on September 14, 2023, I argued the federal stipulations of persons prohibited from possessing firearms. (Appendix B- Brief Submitted to 1st. Department, page 98.)

TITLE 18, UNITED STATES CODE, SECTION 922g

- Anyone under indictment for a crime for which they could be imprisoned for more than one year. *“I was/am not under indictment.”*
- Anyone convicted of a crime for which they could have been imprisoned for more than one year. *“I have never been convicted of a crime.”*
- Anyone who is an unlawful user of marijuana, narcotics or any controlled substance. *“I am not an unlawful user of marijuana, narcotics or of any controlled substance.”*
- Anyone who has been adjudicated mentally defective or involuntarily committed to a mental institution. *“I have never been adjudicated mentally defective or involuntarily committed to a mental institution.”*
- Anyone dishonorable discharged from the Armed Forces. *“I have never served or enlisted in the Armed Forces.”*
- Anyone in The United States illegally. *“I am a United States Citizen.”* *“Does this law apply to Dreamer Police Officers; even though they were brought here through no fault of their own, they have not applied for citizenship, and many do not have proof of legal resident status? Additionally, they do not even have a citizenship application or legal resident application on file.”*
- Anyone subject to a court order restraining them from harassing, stalking or threatening an intimate partner or child of a partner. *“I am not nor ever was subject to a court order restraining me from harassing, stalking or threatening an intimate partner or child of a partner.”*
- Anyone convicted of a misdemeanor crime of domestic violence. *“I have never been convicted of any crime, to include domestic violence.”*

Also, I argued that the firearms license denials are in direct contradiction to the Bruen vs. NYPD ruling, which strikes down the May Issue to Shall Issue.

(New York State Rifle & Pistol Association, Inc. v. Bruen, 597 U.S. 1 (2022))

During the trial, the opposing counsel argued and stated *twice* that I have a criminal record, and I repeatedly informed her, and the panel of judges, that I do not have a criminal record; also opposing counsel tried to remind me that I am

under oath and that I can be held liable for perjury. I asked the opposing counsel to present the criminal record so that I and the panel of judges and review it and the opposing counsel could not. (The New York Supreme Court Appellate Division, 1st. Department; September 14, 2023 trial)

The opposing counsel requested an adjournment in February 2023 for May 2023, citing that she needed to gather all of the documentation in efforts to present the case, and in March 2023 the opposing counsel requested a *second* adjournment to September 2023, citing that she needed to obtain all documentations from the County Clerk's Office. And as the opposing counsel gathered all documentation and prepared her argument, she should have required access to the alleged "criminal record" and it would have been at this time that she would have been informed that I do not have a criminal record; even during the trial, one of the panel judges had to signal to the opposing counsel (he shook his head 'no') to signify that I do not have a criminal record, as she continued to argue about an alleged criminal record. The opposing counsel was granted two opportunities, a total of 6 additional months, to prepare for trial and during the arguments it was apparent that she was *still* unprepared.(Upload upon request–Appendix B– Agreement to May 2023 Adjournment with Attorney Number 2, page 1. Upload upon request–Appendix B– Attorney Number 2 September 2023 Adjournment and 1st. Department Granted.)

One example of the opposing counsel being unprepared was that she argued my final wishes for any firearms and ammunitions in the event of my death, and I informed the opposing counsel and the panel of judges that in the event of my death that any firearms and ammunitions should be given to the Military. Moreover, final wishes for any firearms and ammunitions fall under the prior May Issue, and it is not included under the current Bruen vs. NYPD of Shall Issue. (New York State Rifle & Pistol Association, Inc. v. Bruen, 597 U.S. 1 (2022))

Additionally, the opposing counsel argued moral character accusations however, she could not give any examples of moral character violations. Also, opposing counsel argued the summons issued from the Transit Adjudication Bureau on November 6, 2017. The opposing counsel tried to argue that I received a summons for failure to pay metro fare and she tried to insinuate that the summons was the equivalent or the proceeding of an arrest. I responded that it was not a summons but a citation or parking ticket, and that it was issued by a parking meter maid. I appealed the citation at the Kings County Supreme Court in Brooklyn, New York, and I won the appeal and did not have to pay the citation, as I proved that I was within the free transfer time period, and that the meter maid could have pulled up this information with the 'electronic device' that she was carrying. (Appendix B—Brief Submitted to 1st. Department, page 99 - 100). Appendix C—Motion to Appeal to Court of Appeals page 46; Amicus Curiae - SCOTUS – Verified Answer with Exhibits, page 200.)

Moreover, the Kings County Supreme Court in Brooklyn, New York would not have 'heard' a criminal summons that would have been the equivalent or the proceeding of an arrest; on the last page of the Honorable Johnny L. Baynes decision, he stated: "and her \$100 ticket is annulled." (Appendix B– Brief Submitted to 1st. Department, page 100.)

Additionally, opposing counsel argued the New York State DMV Lifetime Abstract, and I returned that I have neither driven nor owned a vehicle in the State of New York. I explained that my driver's license was transferred from Washington DC to New York and as such the New York State DMV Lifetime Abstract will not contain any information. Moreover, this information was explained during my in-person interview with Detective Moyer, and the information was included in my firearms application. This argument did not surface until the 1st. Department Brief For Respondent, and at the trial hearing on September 14, 2023. Also, the DMV Lifetime Abstract does not include the Transit Adjudication Bureau citation issued on November 6, 2017. (The New York Supreme Court Appellate Division, 1st. Department trial on September 14, 2023; Appendix C– Motion to Appeal to Court of Appeals, page 56; Amicus Curiae - SCOTUS – Verified Answer with Exhibits, page 103.)

Lastly, the opposing counsel argued about the arrest in 2011 as grounds for a denial, however, the opposing counsel could not explain the circumstances for the dismissal of all charges. I argued that the circumstances were that the relative admitted that she lied and that she filed a false police report.

Additionally, I argued that the record was sealed and that I and The New York Police Department were and are denied access to the record. Even though the opposing counsel and The New York Police Department were and are *still denied* access to the record, they have continued to argue without reviewing the contents and circumstances of the sealed record. Each time that the opposing counsel has argued the arrest in 2011, they have argued blind, as they are unable to review the contents of the sealed record.

Opposing counsel also cited previous legal cases of charges dismissed or dropped and how the applicant was still denied the firearms license; however, in each case cited the opposing counsel for The New York Police Department was privy to the contents and the circumstances of the dismissed charges or dropped charges unlike my record, where they had to 'guess' and surmise and lie and submit false statements under oath.

Upon review of the Brief For Respondent as presented to the New York Supreme Court Appellate Division, 1st. Department, and the video footage of the trial on September 14, 2023, the opposing counsel arguments did not reflect the Bruen vs. NYPD ruling of Shall Issue, and the opposing counsel was wholly unprepared without any documentations to support her arguments for an alleged "criminal record," and moral character violations. (New York State Rifle & Pistol Association, Inc. v. Bruen, 597 U.S. 1 (2022); Amicus Curiae - SCOTUS – Verified Answer with Exhibits, page 130.)

Moreover, the opposing counsel for The New York Police Department, and the firearms application denial by the New York Supreme Court Appellate Division, 1st. Department, displayed blatant disregard for the Bruen vs. NYPD ruling of Shall Issue. It is clear, that The New York Police Department and the courts are only removing the words “proper cause” while remaining the components, checklists, and the required submitted documents under the previous May Issue. I applied for my firearms license in April 2020, and the application that I filled out in April 2020 was completely different from the second firearms application that I was required to submit in March 2021. This application included additional questions and requirements such as notarized statements of character references, notarized statements for safeguard in case of death or disability, statements of crimes against businesses or applicants, letters from physicians for medical clearances, and letters of necessity, and community assessments establishing moral character, etc. - all of which fell under the May Issue and does not comply with the Bruen vs. NYPD Shall Issue Ruling. (New York State Rifle & Pistol Association, Inc. v. Bruen, 597 U.S. 1 (2022), Amicus Curiae - SCOTUS – Verified Answer with Exhibits, page 200.)

On January 16, 2024, the New York Supreme Court Appellate Division, First Department denied the motion for appeal to the New York State Court of Appeals. (Appendix C- Motion to Appeal to the Court of Appeals, page 6)

3. New York State Court of Appeals

On October 5, 2023, the New York Supreme Court Appellate Division, First Department denied the appeal of Ward vs. NYPD Firearms License. (Appendix C- Motion to Appeal to Court of Appeals, pages 38-39)

On October 17, 2023, I filed a motion to appeal to the New York State Court of Appeals, however, I only submitted the motion to the opposing counsel Tahirih M. Sadrieh with the New York City Law Department, and the New York Supreme Court Appellate Division: 1st. Department, as I was waiting on the decision for the motion to appeal from the New York Supreme Court Appellate Division, First Department.

However, on October 27, 2023, the opposing counsel Tahirih M. Sadrieh with the New York City Law Department requested that The New York State Court of Appeals deny the motion to appeal. The New York State Court of Appeals replied that no such request has been submitted to the courts. First the opposing counsel was unprepared, and then the opposing counsel got ahead of herself by submitting a request to deny the motion to appeal to the New York State Court of Appeals. (Appendix C-Motion to Appeal to the Court of Appeals, pages 10-13.)

On January 16, 2024, the New York Supreme Court Appellate Division, First Department denied the motion to appeal to the New York State Court of Appeals. (Appendix C – Motion to Appeal to the Court of Appeals, page 6.)

However, one day later on January 17, 2024, the New York State Court of Appeals, on its own motion, will consider its subject matter jurisdiction with

respect to whether a substantial constitutional question is directly involved to support the appeal taken as of right (CPLR 5601 [b]). (Appendix C – Motion to Appeal to the Court of Appeals, pages 35-36.)

The case of Ward vs. NYPD Firearms License with the New York State Court of Appeals on June 18, 2024 was denied the motion to appeal. (Appendix C – Motion to Appeal to the Court of Appeals, page 72.)

A. I live in constant fear for my safety and my life

Since I applied for the firearms license in April 2020, and as I went thru the firearms license application process, I have had death threats, endured physical harm, and an attempted murder. I have been targeted and conspired against by The New York Police Department, which resulted in my false arrest, false imprisonment and assault by a police officer in November 2021 – right smack in the middle of my firearms license application process, the timing could not have been more obvious:

I originally applied for the firearms license in April 2020.

I paid the \$346.80 application fee in May 2020.

I was fingerprinted by Officer Richard DeRiggs, and I paid the \$88.25 fee in October 2020.

I was contacted to resubmit to a changed firearms license application in March 2021.

I was interviewed in person by Det. Moyer, and he stated that there was no reason to deny the firearms license in May 2021.

I was denied the firearms license citing no proper cause in May 2021.

I was denied the NYPD appeal citing no proper cause and moral character accusations in June 2021.

I requested the Article 78 Proceeding in July 2021, I received a response from NYPD counsel in August 2021, and the Proceeding was adjourned to allow for counsel to prepare the Answer and Verified Exhibits, to October 2021.

I received the Answer and Verified Exhibits which consisted of a thorough federal background check– it was clean as a whistle with no reason to deny the firearms license on October 8, 2021.

I was arrested on November 6, 2021.

I informed NYPD counsel and the Article 78 Proceeding Judge Kelley about the arrest on November 15, 2021 with a court date of December 14, 2021.

(Upload upon request - Appendix B– Brief Submitted to 1st. Department, page 57; Amicus Curiae - SCOTUS – Verified Answer with Exhibits, pages 1-2, 32-37, 49-52, 103, 130, 200, 210-227, email correspondences with NYPD counsel, email correspondences with NYPD Headquarters Firearms License investigators, payments received receipts, letter hand delivered to Judge Kelley's office).

My Article 78 Proceeding was dismissed on December 20, 2021 without a full evidentiary hearing with which I would have proven the willful false statements were indeed false. I believe that because they could not find any state or federal law reasons to deny me the firearms license, and because the mean old Department of Justice would not allow them to view my sealed record, that they panicked and threw a tantrum, and went too far. During the false arrest and false imprisonment my 1st, 2nd, 4th and 8th Amendment rights were publicly and boldly violated. And in the years following, the violation of my rights was taunted and celebrated by the surrounding community to include the Dreamer police officers who would follow me and publicly engage in acts of intimidation and harassment. (Upload upon request– Amicus Curiae - SCOTUS – SCOTUS Brief.)

Moreover, the lawyers for The New York Police Department casually lied to the Article 78 Proceeding, The New York Supreme Court Appellate Division, 1st. Department, and The New York State Court of Appeals about a fictitious criminal record. Additionally, and each time, the presiding judge(s) has allowed for such lies without demanding to see said alleged criminal record. (Appendix B – Brief

Submitted to 1st. Department pages 48-54, Appendix C-Motion to Appeal to Court of Appeals pages 9-12, 38-39.)

The individuals listed in my firearms license application as under proper cause were never investigated, questioned or separated as de-escalation. They have been permitted to remain and have continued access. The Dreamer police officers were permitted to assess each entry, and they came to the same conclusion that there was not a reason to separate any of us and, true to form; they will not let you get away from them. No matter what I said, wrote, or requested the ending was and is always the same – they will not let you get away from them. In contrast however, they will allow those same individuals to whine and complain about being ignored or any refusals to engage with them, and will allow them to insult my intelligence by including them in topics that are clearly over their heads. Also, they will overlook and lie when those same individuals would harm, physically attack, or accost, bump into, lean on, be handsy, and or fall on me. (Upload upon request - Amicus Curiae - SCOTUS–Verified Answer with Exhibits – Ward v. NYPD pages 82-86 and 108-111.)

Every single day, I am reminded in some manner, of the attack and the horrific events that followed at the hands of The New York Police Department's Dreamer police officers on November 6-7, 2021; and it is the Dreamer police officers who has managed to say that the situation is safe and not warranting separation, while at the same time it is unsafe enough to deny my 2nd Amendment right. (Upload upon request - Doorbell Videos –Apartment 201,

Apartment 207, Miscellaneous Videos; Appendix A - Civilian Complaint Review Board Findings for November 2021 dated May 3, 2023 page 118.)

This is in direct contradiction to any training and experience that any of them could have received. It is the duty and responsibility of a certified police officer to remove or separate as de-escalation, any and all plausible or perceived threats, and most especially when investigating a firearms license application that *was* under proper cause. Most police officers would demand separations as an acceptable alternative to issuing a firearms license. In contrast, these Dreamer police officers were able to deny the firearms license while allowing continued access. No situation is ever safe enough to allow continued access but unsafe enough to deny the 2nd Amendment right. This in turn allowed the Dreamer police officers to portray me as a criminal while counting on me to obey the gun laws.

Additionally, the Dreamer police officers and the surrounding illegal immigrant community has interfered with my every attempt to get away from them which includes: City FHEPS, the One Shot Deal application which would allow me to have the necessary funds to relocate, also interference with the payout policies and terms of my renters insurance, actively monitoring and following my whereabouts, access to my apartment when I am not home and *always* without permission, requesting that the surrounding community inform them of any of my attempts to get away from them so that they can intervene, etc., and as such, after multiple attempts to get away from them, it is infuriating

and unfair for the Dreamers and other illegal immigrants and migrant's community to have it both ways by being permitted to participate, and claim fear or threat concerning my firearms license application. (Upload upon request – **Appendix A- One Shot Deal Paperwork Submitted, Administrative Appeal Request, Application Submitted, One Shot Deal Fair Hearing, Fair Hearing, Renters Insurance Policy – Lemonade; SNAP – Phone Interview Complaint filed with HRA Office, Letter to Mayor Adams Bathroom Incident, Letters to HRA Commissioner Steven Banks.**)

B. That witchcraft spirit of disobedience

Many times, after November 2021, the Dreamer police officers were told to stay away from me and they have routinely disobeyed. Every single day after November 2021, I encountered the Dreamer police officers as I went about my daily routines or as I ran my errands. The intimidation tactics and behaviors were exactly the same as when they were targeting and conspiring against me prior to November 2021, in efforts to falsely arrest and falsely imprison and assault me. And due to their ineptitude, they are unable to recognize this behavior as recidivism. Prior to November 2021, I noticed the following: the standing on the side of the road as I passed, conversing with the surrounding community about me, and the constant presence in my residential building to include their constant communications and conversing with the staff and some of the residents about me. And after November 2021, the behaviors and actions were the same, this continued unending, until recently on January 30, 2024,

when The New York City Council created the NYPD Stops Act. (New York City – How Many Stops Act Legislative Package.)

It is my personal opinion that because The New York City Council and The New York Police Department did not want to fire the Dreamer police officers for their insubordination, they instead created an unnecessary law. Instead they should have walked them out the door one by one. There is not a union, law, or rule, etc., that can prevent or appeal the firing or termination due to insubordination, i.e. disobedience. Failure to obey a command or an order and failure to follow instructions or directions has and will always be a firing or terminating offense. Additionally, they could have terminated their employments for failure to provide proof of citizenship or legal resident status. And for the assigned or biological males they could have fired them for failure to register for the Draft or Selective Service and for lying on a federal application – as they did not pass a thorough background check. Failure to register for the Draft or Selective Service is a federal felony. Also, they could have reviewed every female Dreamer police officers' background investigation record to ensure that every assigned or biological male over the age of 18, who surfaced in association, relation or in relationship, with her, has registered for the Draft or Selective Service, and if found not registered, she could have been terminated under the Moral Character background investigation. The NYPD Stops Act is yet another example of the “kid gloves” treatment that has been unfairly granted to them. (Appendix A – Selective Service page 117.)

Ironically, it was the surrounding community who complained to The New York City Council Members, and demanded that they do something to stop the Dreamer police officers intimidating tactics and behaviors. Because the Dreamer police officers cannot read the room, they failed repeatedly to notice the disapproving looks, expressions of anger, and the statements and comments stemming from the surrounding community.

Even though I do not encounter them as often as before, they are still finding ways to follow me, will park or stand on the side of the road as I pass, and be in the same place at the same time, and converse with the surrounding community and the staff and resident at this location about me. Each time that I encounter them and as they use their intimidation tactics, I ensure that I am 'dragging my feet' as I walk, and I ensure that I move in 'slow motion' with whatever I am doing – so as to remove the excuses of coincidences or incidental occurrences. Also, I will 'drag my feet' with the other Dreamers, and other illegal immigrants and migrants, because if not, they will be 'in lock step' around me as I run my errands, or go about my daily routines; upon first glance we look like synchronized dancers.

One example is on March 9, 2024, I was at the laundromat and as I began to remove my clothes from the dryer, two Dreamer police officers came in and used the excuse of using the bathroom. One stayed in the bathroom for the duration of me removing my clothes from the dryer, while the other stood and watched me. I had two full loads of clothes in one large dryer, and I intentionally

removed my clothes one at a time and at a slow pace, and the one Dreamer police officer stayed in the bathroom, while the other stood and watched me the entire time. Also, I was 'dragging my feet' as I left the laundromat and the two Dreamer police officers came out of the laundromat behind me and walked behind me as I left. It was raining *hard*, and they slowly walked in the rain behind me. I was wearing a raincoat and my wagon was covered with a plastic rain cover, they on the other hand, were not wearing hats or raincoats, and they did not have an umbrella.

And unfortunately, due to that spirit of disobedience they are not going to obey the new law, because that demonic spirit of disobedience is as witchcraft. 1 Samuel 15:23, Holy Bible, kjv. The NYC Stops Act was ratified on January 30, 2024 and in less than 6 weeks later; two 2-time felon Dreamer police officers disobeyed the law on March 9, 2024.(New York City – How Many Stops Act Legislative Package.)

IX. Reasons For Granting The Writ

- a. To avoid The New York Police Department Headquarters Firearms License Division from continuing to ignore the Bruen Ruling as decided by this Court; and to avoid allowing The New York Police Department Headquarters Firearms License Division from implementing rules that are not stated rules of law such as with the Second Amendment and TITLE 18, UNITED STATES CODE, SECTION 922g, or state and/or federal law, such as moral character accusations from the general public, medical clearances, unsubstantiated complaints from strangers in the community, minor traffic violations from the Department of Motor Vehicles; and erroneous findings during background checks in efforts to deny, prolong or discredit firearms license applicants and thereby requesting the consideration of Constitutional Carry or permit less carry.

b. This Writ falls under the importance to the public of issue.

In the event that this Court allows the Bruen Ruling to remain standing and require that New York City residents continue to apply and obtain a firearms license permit, the Bruen Ruling will continue to be ignored by The New York Police Department Headquarters Firearms License Division. Additionally, the Firearms License Division will continue to acquire additional information that are not supported by state and/or federal law such as, moral character accusations from strangers and from those who are not credible, medical clearances, and they will continue to use information obtained from the Department of Motor Vehicles (DMV) such as minor traffic violations, to use against the applicants, and etc. And upon investigation you will find that moral character accusations literally consists of taking a general 'poll' of any accusations, concerns, statements, opinions, feelings, thoughts, etc., from the general public of whom can be complete strangers; of which NYPD are not required to inform the firearms license applicant of these accusers, neither do NYPD have to identify these accusers to the applicant and allow the applicant to face his/her accusers in a court of law. Moreover, NYPD does not conduct background checks or obtain any information on these accusers for record keeping and cannot verify if the accusers background checks can hold up against the firearms license applicants' background check. And as with my case, it would be one probable cause and/or reasonable belief confrontation after the

other, with The New York Police Department, as I believe that the Firearms License Division has shifted from 'record keeping' to gun control.

Moral characters accusations prove that The New York Police Department Headquarters Firearms License Division cannot be trusted to follow the state and/or federal law, as New York State law of August, 2022, allows for moral character assessments to come from character references and not from the general public. Additionally, they cannot be trusted to limit moral character assessments to and from character references only. And, you may recall that I wrote in the Amicus Curiae how they will essentially abuse and misuse the trust and the presumption of trust and the presumption of truth, from the public and elected and government officials, by 'counting on' the public and elected and government officials to not go behind them, check behind them, and/or inquire into their decisions, judgments, and actions, etc. The New York Police Department Headquarters License Division simply cannot be trusted to play by the rules.(Upload upon request -Appendix B- Brief Submitted to 1st. Department, page 57; Amicus Curiae - SCOTUS – SCOTUS Brief; Amicus Curiae - SCOTUS – Verified Answer with Exhibits, pages, 1-2, 32-37, 49-52, 103, 130, 200, 210-227.)

X. Conclusion

A. Police officers must remain a - political and unbiased

The New York Police Department (NYPD) is one of two police departments in the world that comes in contact with people of all walks of life; the other is The

Los Angeles Police Department (LAPD). The residents of New York City are from all walks of life and every income level; and it includes former and current members of the three branches of government, entertainers, celebrities, past or current members of past or current Monarchs from all over the world; the famous, the infamous, professional athletes, authors, actors, musicians, a plethora of practicing religious groups and faiths, and prominent and notable people of every industry, field, and career that there is. And as such, it is unacceptable and quite frankly unheard of for the New York's Finest to allow politics, rumors, conspiracy theories, influencers, the media and social media, the personal feelings of others, and the preferences of immigrants (legal and/or illegal), etc., to dictate and impact their policing duties, decisions and actions. Because of the positions and access that the police officers with The New York Police Department has to the plethora and diversity of the public – their ability to enforce the law with fairness, equity and while being completely unbiased cannot come into question. After I was taken to the 24th police precinct, the Latina female police officer stated: “you are here because you be running your mouth.”

In the Amicus Curiae, I wrote about the Dreamer police officers arresting and charging and incarcerating Americans, despite their innocence, in efforts to keep the crimes of the Dreamers, and other illegal immigrants and migrants, from being recorded and being included in the statistics. The Dreamer police officers, who were unable to provide proof of their citizenship or legal resident status,

were told to resign from police departments and sheriff's departments across the country. This in turn resulted in an almost overnight high number jump in the arresting, charging and the incarceration of Dreamers, and other illegal immigrants and migrants. The almost overnight high number jump proves that for decades the Dreamer police officers were falsely arresting, charging and incarcerating Americans, even though it was actually the Dreamers, and other illegal immigrants and migrants who were committing the crimes. (Upload upon request – Amicus Curiae - SCOTUS – SCOTUS Brief.)

It is heartbreaking to know that there are Americans who are or were arrested, charged and incarcerated and who have criminal records because the Dreamer police officers were so intent on keeping the numbers of Dreamers, and other illegal immigrants and migrants from being recorded and included in the statistics. After comparing the crimes statistics before 2022 and after 2022, it appeared that only Americans were committing crimes and that everyone who entered into this country as a Dreamer, and other illegal immigrant and migrants was a "model citizen," as there were no crimes recorded on them. The Dreamer police officers callously arrested, charged and incarcerated Americans instead of the Dreamers, and other illegal immigrants and migrants who had actually committed the crimes. They knew that the Americans would be incarcerated and would carry a criminal record for the rest of their lives. They went to great lengths to keep the records and numbers down on the statistics;

they chose the American over the Dreamer and other illegal immigrant and migrant, regardless as to the Americans' innocence - they are heartless.

In the Amicus Curiae, I requested that the Department of Justice reopen and take a second look at the cases of those who come forward requesting their assistance. However, due to the "resignations" and almost overnight high number jump in the arresting and charging and incarceration of the Dreamers, and other illegal immigrants and migrants since that time; I believe that the onus is on the Department of Justice and in the interest of justice, to take a second look and reopen cases (past and present, serving and time served) overseen by every Dreamer police officer who resigned because, they could not provide proof of citizenship or show legal resident status, and who failed to register for the Draft or Selective Service. Additionally, every male employee between the ages of 18-65 who holds a position within the Department of Justice, to include the Judicial System, and every police department and sheriff's department who failed to register for the Draft or Selective Service, should be automatically removed from the bench, disbarred, and or terminated - no questions asked; as failing to register for the Draft or Selective Service is a federal felony and it is punishable by fines of up to \$250,000 and/or a 5 year prison sentence. (Appendix A- Selective Service.)

B. Conspiracy Theory

Although I would never call myself a conspiracy theorist, however, methinks that the numerous district attorneys' offices, police departments and sheriff's

departments, etc., are trying to handle this new information as quickly and quietly as possible. Methinks that the reason is because they don't want to expose themselves to two types of class action lawsuits: one would be from the previously and or currently incarcerated individuals and those who have a lifetime criminal record, to include Americans whose cases were presided over, dismissed, suspended or dropped after being attacked, hurt or harmed by Dreamers, and other illegal immigrants and migrants. And, the other would be a class action lawsuit from police unions, because of American police officers and other police department employees, to include civil servants, etc., who worked as colleagues, partners, those who were subordinate to, interviewed by, hired, disciplined, fired, etc., by Dreamers, and other illegal immigrants and migrants, of whom could not provide birth certificates, citizenship applications, green cards, legal residents statuses, asylum documentations, registrations for the Selective Service, etc.; I would wager that they would even take a library card at this point. They were probably in the meetings talking like auctioneers: "birth certificates, citizenship applications, green cards, legal resident documentations, asylum documentations, Selective Service registrations, and finally they were like, library cards?"

These male law enforcement officers, judges, clerks, city, state and federal civil servants, and etc., who are Dreamers, and other illegal immigrants and migrants has successfully committed their *second* known felony. The first felony was entering into this country illegally, or upon reaching the age of adulthood

and accountability, they failed to begin the citizenship application process. And the second felony was failing to register for the Selective Service – they are ‘two-time felons.’ Additionally, every male who retired within these jobs, positions or appointments who failed to register for the Selective Service, should be called in and have their retirements and benefits rescinded to include the denial of benefits of every male who is receiving Social Security benefits, as The Social Security Administration is a federal agency.

The fore mentioned are examples of not thinking that the rules and laws apply to them, and that they were waiting for an “amnesty sweep.” And apparently this “amnesty sweep” needed to include a couple of exemptions or forgiveness and graces. I wonder how they would have reconciled the tens of millions of employees as civil servants for city, state and federal government, as judges, attorneys, and as police officers, etc., who failed to at least *apply* for citizenship, obtain legal residents’ status, a green card, etc., to include the tens of millions of males who failed to register for the Selective Service?

C. My sealed and redacted record with The Department of Justice

I request that this Court instructs The Department of Justice to unseal and un-redact any and all of the contents surrounding my arrest on July 10, 2011. Also, during the court Proceeding or court documents for the Article 78 Proceeding, and the Supreme Court of the State of New York Appellate Division, First Department, and State of New York Court of Appeals. The counsels for The New York Police Department have argued the arrest even though the record has

been sealed and they are unable to view the contents. The counsels for The New York Police Department has unsuccessfully requested that The Department of Justice unseal the record, and even though they have been repeatedly denied access, the counsels for The New York Police Department has blindly presented this information as arguments against the firearms license, and they have falsely stated during court Proceeding or in court documents, that I was on trial, and was found guilty, and that I was sentenced to community services, and that I have a criminal record; and each time the courts has *allowed* The New York Police Department to 'imagine' and make guesses as to the circumstances surrounding the sealed record. And each time, the courts have failed to instruct the counsels to present the alleged criminal record. (Appendix B – Brief Submitted to 1st. Department pages 49-54; Appendix C - Motion to Appeal to the Court of Appeals pages 38-39.)

I request that in addition to access to the unsealed and un-redacted arrest record, that this Court instructs The Department of Defense under the Freedom of Information Act (FOIA) to include inside of the arrest record, a link to the list by name, date of birth, and with accompanying photographs of all males who have registered for the Selective Service as former and current civil servants for the city, state, and federal agencies to include those appointed, and elected, etc.; and to all positions that fall under state and/or federal background investigations. Additionally, I request that the list dates back tens of years in efforts to remove any 'date of entry' lies. (Recorded video footage of the Supreme

Court of the State of New York Appellate Division, First Judicial Department on September 14, 2023, and Appendix C – Motion to Appeal to the Court of Appeals, pages38-39.)

Moreover, I understand that there are areas in the arrest record that are redacted and that those areas protect government officials – not me. However, since those protected government officials have been unsuccessful with removing the sealed arrest record from the firearms license court Proceeding, and they have been unsuccessful in encouraging counsel to refrain from including the sealed arrest record from arguments; I request that those areas are un-redacted in efforts to prevent anymore imaginations and guesses as to the contents of the redacted areas. Despite their years of experience in law enforcement, as counsel for The New York Police Department and years of experience as judges, clerks, etc. – they seem to believe that the sealed and redacted areas are for my benefit.

D. Mayor of New York City, 2025

Lastly, I request that the sealed record is opened and available to the public to include all video footages from November 6-7, 2021, to include Huntersmoon residential building, the 24th police precinct, from Booking Central Jail (to include the stairwell), inside and outside of Bellevue Hospital and New York Presbyterian Hospital in New York City, respectively, and police body cameras, inside of the patrol cars, and the Manhattan Criminal Courthouse on November 7, 2021, December 14, 2021, January 18, 2022 and February 22, 2022, as I am running for Mayor of New York City in 2025. I request that all records and

video footages are made available to the public in efforts to eliminate false statements, attacks in the media, character assassinations, and innuendos as to the contents of the record and video footages; as because I will be unable to defend myself in the mayoral race, and provide documentation in the aforementioned areas. (Appendix A – Mayor of New York City, 2025.)

E. Moral Character Accusations

During the investigation stage of the firearms license, the License Division sent out investigators to inquire from the general public as to their fly-by-night thoughts, feelings and opinions of my possessing a firearms license – and this information was used as establishing moral character of the firearms applicant. The relationship, knowledge or even access to those from the general public was of no importance. And, I was and am subjected to the thoughts, feelings and opinions of anyone and everyone, and likewise I request that all female civil servants with the city, state and federal agencies to include appointed, elected, and most especially judges, and law enforcement officers, etc., in all positions that fall under state and/or federal background investigations, have all males, i.e., husband(s), boyfriend(s), fiancé(s), father(s), grandfather(s), male guardian(s), brother(s), son(s), to include friends and acquaintances, etc., of those who surfaced during her background investigation, and those who were used as character references, to be queried into The Department of Defense Selective Service Registry, to see if they registered for the Draft, as establishing

and or reassessing the moral character of the civil servants, appointees, and elected officials, etc.

The aforementioned relations or relationships are of significant influence and impact, which builds, molds and shapes the moral character and values of the female civil servant, law enforcement officer, judge, appointee, elected official, and etc., and as such, she was molded, influenced, impacted and shaped by one or more males who failed to perform his number one patriotic duty: to register for the Draft Call – unlike myself, she *knows* these individual(s) and they have a greater probability of influence and access to her, and they can accurately reflect on her moral character.

Should any males who are either related to, in relationship with, or have access to her, who failed to register for the Draft, I request that she is terminated from her position, removed from the bench, impeached, etc., as she has failed the moral character section of her background investigation; and it indicates a high probability of being compromised due to the relation of, in relationship with, or access to, of those who committed a federal felony.

F. Red Flags for everyone

Before the Bruen ruling and increasingly thereafter, Red Flags are used to either remove or prevent an individual from possessing firearms. I request that every male who possesses a firearms license or who is applying for a firearms license to have his name queried into The Department of Defense Selective Service, and if not registered, I request that they receive a red flag. Failure to

perform his number one patriotic duty is a federal felony - and it is a red flag. Additionally, I request that every male who has failed to register for the Selective Service either by the age of 26 or who has entered this country after the age of 26, and has failed to register for the Selective Service, is informed that they are no longer eligible to vote in any election as failure to register for the Selective Service is a federal felony.

I request that this Courts' decision for Constitutional Carry be in the affirmative because, after the Bruen ruling, I believe that police departments and sheriff's departments to include other law enforcement agencies across the country are being inundated with Dreamer police officers routinely targeting and conspiring against American citizens with increased unexplained firearms license denials, red flag allegations, lacking moral character accusations, and threats and fear for life allegations, etc. As of 2024, there are approximately 29 out of the 50 states in the Union, that has a form of Constitutional Carry or permit less carry, which further confirms that the states that requires the firearms licenses are in the states that have an increased population of Dreamers, and other illegal immigrants and migrants. And, those states have a record high number increase of red flag allegations, lacking moral character accusations, threats and fear for life allegations, etc. I would like to add that prior to November 2021, there were only 20 states out of the 50 states that had Constitutional Carry or permit less carry, and after November 2021, 9 more states became Constitutional Carry or permit less carry within two years, and I

like to think that the publicity of what happened to me played a role in the increase.

In stark contrast, the states that do not require firearms licenses do not have an increased population of Dreamers, and other illegal immigrants and migrants, and they do not have any noticeable red flag allegations, lacking moral character accusations, threats and fear for life allegations, etc. In conjunction, I believe that this is an orchestrated effort to disarm Americans, and I believe that the American police officers in the states that requires the firearms license want the Supreme Court of the United States to issue a final ruling so that the routine targeting and conspiring, and the increased allegations that are resulting in the systematic disarming of Americans - would stop. With 29 out of the 50 states being Constitutional Carry or permit less carry, police departments and or sheriff's departments, etc., cannot say that they are protecting Americans - it is for the preference of immigrants (legal and/or illegal). Also, you will find that many of the remaining 21 states have a high population of immigrants (legal and/or illegal).

G. I know what it is and I know what it ain't

Additionally, I request that this Courts' decision for Constitutional Carry be in the affirmative as it has become apparent that the firearms license divisions within police departments and sheriff's departments have lost the understanding of its purpose - record keeping. The lawful possession of firearms is the 2nd Amendment in the Constitution, and in efforts to keep a record of who

has what, police departments and sheriff's departments created a firearms and other weaponry database.

Also, I request that should this Courts' decision for Constitutional Carry be in the affirmative, that the ruling decision includes language that prohibits any and all forms, alternatives and methods of asking, inquiring, searching, to include the use of various methods and tools, and thus answering and record keeping as it pertains to firearms and other weaponry, and *specifically* from police departments and sheriff's departments. In times past, The New York Police Department instituted the 'stop and frisk' in efforts to answer the question of "are you carrying any weapons?" And I always thought that if New Yorkers were permitted to volunteer this information by registering without hassles and confrontations, that it would eliminate the need to answer the question with 'stop and frisk,' and the use of metal and/or firearms detectors.

Moreover, it has become apparent with the hassles, runarounds, and other preplanned obstacles, confrontations and with the targeting and conspiring against firearms applicants, to include special consideration for the Dreamers, and other illegal immigrants and migrants wanting to deny Americans their 2nd Amendment rights; that the desire to keep a record is no longer paramount. Not one police officer has explained to the Dreamers, and other illegal immigrants and migrants the right of every American citizen as included in the Constitution. And not one police officer has explained the definition and purpose of firearms license divisions or departments, and as such, they have taken advantage of

their ineptitude by appeasing and pacifying, and allowing them to believe that if a person does not possess a firearms license then they do not possess any firearms or other weaponry.

For example, should I decide to conceal carry a firearms, I should neither be searched, stopped and frisked, asked or inquired of, to include any and all other forms, alternatives and methods by any police officer, in efforts to answer the question of "are you carrying any firearms or other weaponry?" because, I was denied the repeated efforts to report and be on record as to any firearms or other weaponry that I may carry or possess. Also, should any police officer observe, is informed of, or find any firearms or other weaponry on my person or in my possession, the police officer should be prohibited from make a note of, logging, reporting or maintaining in any manner said information, because, the aforementioned actions would be consistent of the definition, purpose and function of the firearms license division.

Since we were prohibited from volunteering and being on record with any firearms and other weaponry that we may have on our persons or in our possessions, they should then be prohibited from playing 'firearms license division' out on the streets. I remember one day, as I was on my way home after working out at a local gym, and this was during the firearms license Article 78 Proceeding, that there were two Latina female police officers standing on the sidewalk, and as I was passing by, one of the police officers extended her arm, and in her hand was a firearms/metal detector, and she pointed the detector in

my direction to see if I was carrying a firearms. After she determined that I was not carrying a firearm, she shook her head 'no' to those who were standing nearby as if to tell them that I was not carrying. I stopped and suggested to her that it would be a lot easier if The New York Police Department would create a way for those who wish to carry or possess a firearm to volunteer and report the information, and as such, be on record.

To be clear, I am a staunch proponent of firearms license divisions or departments, and I personally believe that all firearms and other weaponry owners should report and register to include listing serial numbers and descriptions, fingerprints, photographs of the owners and of all subsequent firearms and other weaponry, locations, and most importantly, mandatory periodic responsible gun ownership classes with mandatory liability and accidental firearms and weaponry insurance, of everyone who wishes to purchase and possess firearms and other weaponry. However, I understand that I cannot have it both ways and I must take it into consideration the lengths, boundaries and lines that they are willing to go and cross, in efforts to discourage all U.S. citizens from obtaining firearms licenses.

To me, it is no different than obtaining driver's licenses and or state identification cards, social security numbers/cards, passports, Selective Service registry, and other permits and licenses to include any subsequent mandatory insurances that is required for the record keeping, possessions and uses. Also, *unpopular opinion*, I believe that all previously incarcerated individuals should

be permitted to obtain a firearms license, register and carry firearms and other weaponry, unless their convictions and sentences includes specific restrictions and prohibitions including the timeframes (i.e. number of years or lifetime), to firearms and other weaponry – I am all for keeping records of who has what. However, it seems as if I am one of the few people in New York City to include The New York Police Department, who understands the reason and purpose of the firearms license division. I know what it is and I know what it ain't.

I have noticed that since the Bruen Ruling that several NYPD police officers have been having increased 'run ins' with individuals carrying firearms. I have also noticed that several police officers have been involved in confrontations and several have even been hurt or killed during these confrontations. Because of the previous "May Issue," NYPD is simply not prepared nor trained to police in a 2nd Amendment society with people possessing firearms. Every time that they encounter or receive information of someone carrying or possessing firearms, they automatically engage in pursuits or proceeds as if the individual(s) are carrying illegal firearms, and illegal weapon(s) charges are automatically applied to the individual(s). Also, I have heard rumors of former NYPD police officers transferring to police departments out of state such as Florida, have run into a 'reality check' as they have encountered the 2nd Amendment and some with 'open carry' in those states; many had to undergo extensive retraining because they were simply unable to police the 2nd Amendment communities. Should the Bruen Ruling remains standing or if Constitutional Carry or permit

less carry becomes the law of the land – The New York Police Department will need to undergo immediate retraining and instructions in efforts to respect and adhere to the rulings of this Court and to refrain from policing the general public under previous automatic illegal weapons policies, pursuits and proceeding.

H. Supreme Court Confirmation Hearings vs. Firearms License Application

Process

Lastly, when I think about my experiences with The New York Police Department firearms license application, and the overall process with the background investigations, the false findings in efforts to create a tailspin, the out of left field moral character allegations and accusations, character references, and the fly-by-night thoughts, feelings and emotions from the surrounding community, to include having defamation statements made about me that are untrue, and how those accusers or claimants were not held to account for their statements, etc.; I cannot help but compare this to the Supreme Court Confirmation Hearings. As I recall, several of the nominees to our nation's highest court in the land:

“1) Endured vapid allegations from unknown individuals and those allegations were entertained and ‘cheered on’ by the media and others; 2) Had their moral characters brought into question regardless as to their years of serving on the bench, their submitted publications, and other accomplishments; 3) Were picked apart by people who could not hold a candle to them; 4) Were treated as if they were on trial during the Supreme Court Confirmation Hearings; 5) Were made a public spectacle of; 6) Were portrayed as predators, name called and mocked; 7) Had to defend themselves even to the point of providing documentations of when they were juveniles, etc.; instead of being celebrated as one of our nation's most capable and intellectual legal minds. “

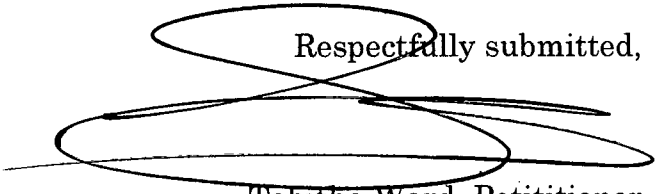
In comparison, The New York Police Department firearms license application process runs parallel to the Supreme Court Confirmation Hearings,

as I was: “1) Required to address and answer to any and all vapid allegations from unknown individuals, and those said individuals were welcomed and ‘cheered on’ by The New York Police Department, the media and others; 2) Able to conclude that my moral character background investigation relied solely upon the vapid accusations and defamation statements from unknown individuals to include multiple two-time felon Dreamers, and other illegal immigrants and migrants, and were included in each level of the firearms application denial; 3) Able to conclude that my previous firearms licenses were ignored to include, I have never had my firearms licenses suspended, revoked or previously denied; and I kept my firearms license and pistol in The State of Alabama after my arrest on July 10, 2011, and how I proved ‘proper cause’ which lead to the targeting and conspiring by The New York Police Department; 4) Treated, discussed, spoken to, persecuted and rebutted against in court as if I was on trial, even though I have never been on trial for anything – this is about a record keeping piece of paper. Moreover, I do not have a criminal record which was confirmed multiple times by The Department of Justice; 5) Held accountable for and it was held against me that my sealed record which included redacted areas by The Department of Justice was denied access, and The New York Police Department have been permitted to imagine and make up the contents of said sealed record. The New York Police Department targeted, conspired against, falsely arrested, falsely imprisoned, and assaulted me, to include for the duration of 36 hours - shackling my feet and handcuffing me while I was wearing a medical boot on my left foot and using crutches during both hospitals stays, while inside of the patrol cars, and while inside of Booking Central Jail. Additionally, I was made to stand up outside of The New York Presbyterian Hospital and outside of Booking Central (at least 2 times) while passersby took pictures and videos of me and these pictures and videos were shared with others; 6) Portrayed as a criminal, a threat and a danger, and most insultingly by two-time felons as Dreamer police officers, and Dreamers, and other illegal immigrants and migrants who won’t let you get away from them. And, The New York Police Department violated my 1st, 2nd, 4th, and 8th Amendment rights on November 6-7, 2021; 7) Able to conclude that the burden of *unknown* proof was upon me each time that I stated that I don’t know these individuals. And according to The New York Police Department, the Iron Pipeline consisting of illegal guns runs from the south and thru New York City, which proves that there are more illegal gun owners as opposed to legal gun owners, and in contrast, I chose to obtain a firearms license and be on record. (Upload upon request – Amicus Curiae -SCOTUS – SCOTUS Brief, Upload upon request - Amicus Curiae -SCOTUS - Verified Answer with Exhibits – Ward v. NYPD – pages: 79-80.) The actions and treatments that the Supreme Court nominees endures during the Confirmation Hearings has become par for the course, and has subsequently trickled down to something as simple, mundane, and a 2nd Amendment constitutional right, such as registering in efforts to be on record for a firearms license.”

I request that this Court grant Constitutional Carry or permit less carry due to the inconsistencies, unconstitutional actions, and the overall untrustworthiness of The New York Police Department Headquarters Firearms License Division.

The petition for a writ of certiorari should be granted.

Respectfully submitted,



Tabitha Ward, Petitioner

October 21, 2024