CERTIFIED MAIL
9/26/22

In the supreme court of Tennessee

State of Tennessee, ex rel. David Jonathan Tulis Appellant	)	
	)	Case No.
V.	)	E2021-00436-SC-R11-CV
	)	
Bill Lee Governor, State of Tennessee Respondent, in personal and official capacity	)	
	)	
Rebekah Barnes Administrator, Hamilton County Health Department Respondent, in personal and official capacity	)	

Verified motion for recusal & disqualification No. 2

Comes now state of Tennessee, on relation, swearing the contents of this motion to be true to the best of his knowledge, to object to the order denying his motion for recusal and disqualification. He demands recusal of the whole court, on further grounds, its members in league with parties outside the case, connection to whom suggests they are ally with respondents and the lower courts, under private interest, rather than fixed on justice, equity and the job to "uphold and apply the law," Rule 2.2, as the oath to judicial office before God requires.

I.

Justice Roger Page arrest of relator grounds. Relator objects to the order insisting Justice Page can be impartial in having ordained relator's arrest in the pendency of this

cause, though on grounds unrelated to the conflict in view in the litigation. The court says, "We disagree that this requires recusal.

> Nothing in this appeal relates to Mr. Tulis's arrest, and a judge is not required to recuse himself simply because he has had previous interactions with a party. See, e.g., Kinard v. Kinard, 986 S.W.2d 220, 229 (Tenn. Ct. App. 1998).

It is true that "nothing in this appeal relates" to relator's arrest covering the Tennessee judicial conference as radio news reporter Nov. 6, 2021, by right at the Embassy Suites at Cool Springs hotel in Franklin, Tenn. The question is not whether the appeal *relates to* an arrest ordained by the chief justice, but whether the chief justice *relates to* this case fairly and impartially while under cloud of acts by his agents that are arguably criminal, subject to fact witness testimony to a grand jury or a tort action either in Williamson County circuit court or U.S. district court.

True, "simply because he has had previous interactions" with a party is not ground for recusal. The court cites the *Kinard* case, [1] which is off point. It cites a judge's and a lawyer's past business relationship eight years prior and two years prior. This case is not about a "previous interaction." It is about an existing unsettled conflict between two people, one a justice with a first blow, the other a petitioner with a right of redress. Does the court not see the terrible optics of its position, wherein the judge may actually *unjustly favor relator* in this cause on account of relator's pursuit of redress in a different

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[1] "The trial judge and the lawyer representing Mr. Kinard had an office sharing arrangement lasting two years that ended eight years before Mr. Kinard sought a divorce from Ms. Kinard. The trial judge had severed all financial ties with Mr. Kinard's lawyer two years before the divorce suit was filed when he sold the lawyer his interest in the building that housed their offices. There is no suggestion in the record that the trial judge stands to benefit in any way from Mr. Kinard's lawyer's practice or that he was ever involved in the present case or any other matter related to the present case. Mr. Kinard's lawyer did not undertake to represent him in this divorce proceeding until long after his professional relationship with the trial judge had ended."

Kinard v. Kinard, 986 S.W.2d 220, 229 (Tenn. Ct. App. 1998)

one? "[J]ustice must satisfy the appearance of justice" *Offutt v. United States,* 348 U.S. 11, 14, 75 S. Ct. 11, 13, 99 L. Ed. 11 (1954), as cited in *Kinard* at 228.

Failure to sue grounds. The state, on relation, objects to denial of its motion for disqualification. The justices "respectfully disagree" with its recusal demand on grounds that "Mr. Tulis's petition did not name the Justices of this Court as defendants" and that the "the issues on appeal *** are unrelated to the actions this Court took in response to the COVID-19 pandemic," those issues on appeal, the court notes, being "among other things, a lack of subject matter jurisdiction and a lack of standing."

In other words, relator didn't sue the participating justices for their actions "in response to the Covid-19 pandemic," so now he must accept them as his judges in a suit claiming their "response to the *** pandemic," like the "responses" of respondents, is fraud and breach. The court's words are an *admission* of the court's role in harms of which the relator complains — all the more ground for recusal. The prospect of recusal does not control litigation and selection of defendants; the facts do. The "issues on appeal" are not merely procedural, as the court alludes. The issues in the appeal are mass fraud, harm to the relator as a man, harm to law and breach, which altogether enstink the record, which frauds commenced with acts of respondents to violate clearly established law T.C.A. § 68-5-104, *which acts the court endorsed.* The court's denial of recusal, as it were, "pretermits" the justices' role and their "personal knowledge of facts that are in dispute," quoting Rule 2.11, causing a whole line of constitutional violations. Relator details these harms and a pattern of judicial bias, due process violations and prejudice in "Notice of judicial department mass fraud," TR p. 339, and other pleadings.

The court says, effectively, "Because you didn't sue us for what we did responding to Covid-19, following respondent governor," "you cannot bring up the claim we're biased in his favor" — a very small square of napkin behind which a court denuded of moral authority and the appearance of impartiality might hide.

Judges have absolute immunity from suit.[2] "Neither the correctness of a judge's decisions, nor his motives, affect this immunity" *Mercer v. HCA Health Servs. of Tennessee, Inc.*, 87 S.W.3d 500, 504 (Tenn. Ct. App. 2002). To suggest relator have sued them for their administrative and departmental management acts of March 13, 2020, in a terrorism event and mass panic led by respondents Lee and Barnes in rebellion against the law, is a point made without discernible good faith. The justices cite no case allowing such suit.

Code commission grounds. As for two justices settled in their swivel chairs on the code commission, the court says relator "argues this violates article 6 section 7 of the Tennessee Constitution. Again, we disagree that this requires recusal." To say that state of Tennessee, on relation, "argues" this point implies the court sees no conflict between statute and constitution, and at the same time that *statute wins*. Unconstitutional practice at one point of law, the court suggests, doesn't affect the court's constitutional integrity in dealing with other parts of clearly established law, namely T.C.A. § 68-5-104. In *approving* its violation and *seeing no harm against relator or equity in its breach*, the bar members in lower courts endorse a train of constitutional harms. Relator is expected to believe the justices will obey constitution and law in present cause — just as they do in holding second offices of trust forbidden by Tennessee const. art. 6, sect. 7.

"Nothing in Mr. Tulis's petition challenged Tennessee Code Annotated section 1-1-102," the court says. To deny relator's demand for recusal because he hadn't sued over this point at the start is to retroactively reinterpret the case history, play a hindsight "gotcha" and suppose an original impossibility. Recusal is based upon facts about a judge external

[2] The judge performs his duty to the public by doing justice between individuals, or, if he fails to do justice between individuals, he may be called to account by the state in such form and before such tribunal as the law may have provided. But, as the duty neglected is not a duty to the individual, civil redress, as for a civil injury, is not admissible.

Webb v. Fisher, 109 Tenn. 701, 72 S.W. 110, 112 (1903)

to the case that bring an internal harm or appearance of bias. Denial ignores the recusal standards to reach back to the Oct. 2, 2020, filing date and allege a misstep as the ground for refusal to disqualify.

The petition is sufficient and adequate as to the purposes of state of Tennessee, its relator and the 7 million people this petition seeks to protect. With cavils the court favors a ***statutory*** duty over a ***constitutional*** prohibition. ***Relator objects. He is being denied due process in this order.*** Recusal on these grounds is proper and upholds the appearance of impartiality and confidence of the public. The petition for equity and mandamus asks the court to uphold a constitutional and valid law, T.C.A. § 68-5-104, and to secure the law's claims upon its subjects liable for performance. It asks the court to enforce duties (such as open courts) and prohibitions in the constitution (no martial law), overthrown by respondents in violating the law. It asks that law control over executive policy admitted by respondents as against the law, just as the recusal motion asks that constitution control over statute, as that is the proper order of authority. Relator demands a hearing from uncompromised judges of constitutional integrity, honesty, good faith and forthrightness.

Relief sought on the court's Sept. 9, 2022, order: Rescission of the order, as argued above,

— The chief justice has not a past relationship with relator but an unknown and potentially perilous future one regarding relator's false arrest by agents, and on that leading ground must disqualify.

— Justices' role in adhering to respondents' illegal actions in a purported pandemic makes a *prima facie* case for recusal in the mind of any reasonable person or member of the public. If they don't today state themselves ***victim*** of fraud of respondent governor, they are *purveyors and collaborators*. To say relator should've sued them to not now have them hear his petition is to abuse the rules of

recusal— ignore them. These rules govern an existing case, not a proposed theoretical one by self-justifying jurists.

— Two justices' role on the code commission and relator's objection are a test of their fidelity to their oaths in a case without precedent that goes to the heart of democratically elected republican representative government under a constitution and raises *existential questions about government's upholding its covenant with the people*. For the court to say a petitioner should have filed a separate suit over such an issue is to pretend that recusal rules control a case before inception, rather than that a case and the people involved in it — and their eventual encounter over bias or potential bias in a judge — control the operation of these ethical standards.

II.

Comes now relator and petitioner, in the alternative, to demand recusal of the five justices of the court for cause, that being its members' commitment to the goals of respondents Lee and Barnes, and their connection to the Tennessee Bar Association and the American Bar Association and its legal reform goals in sustainable development.

The court's justices are members of the Tennessee Bar Association, according to their bios on the court system website.

The American Bar Association declares its interest in an unlawful end anticipated as a defense in the state's petition, on relation, not denied by respondents, taken true.

> 85. If the relator had thought the judiciary was protected and actually independent, that confidence was dashed when reading that the **American Bar Association's House of Delegates** in 2013, reaffirmed its 1991 and 2003 "*commitments to sustainable development*, and defines sustainable development as *'the promotion of an economically, socially and environmentally sustainable future*

for our planet and for present and future generations," and professes an "ongoing commitment to the International Legal Resource Center in collaboration with the United Nations Development Program," "giving impetus" to the federal government. "The U.S. government **should take a leadership position in ongoing and future negotiations on sustainable development**, including climate change" while developing a **"[p]artnership** in the Global Forum for Law, Justice, and Development" and a "new, dynamic and innovative initiative spearheaded by the World Bank Legal Vice Presidency with the support of client countries, think-tanks, regional and international organizations, international financial institutions, and civil society organizations," to support "ongoing negotiations relevant to sustainability include a variety of processes on specific issues established by the U.N. Conference on Sustainable Development (e.g., strengthening international institutions) and a new international framework to address climate change under the U.N. Framework Convention on Climate Change.";
https://www.americanbar.org/content/dam/aba/administrative/office_president/2013_hod_annual_meeting_105.authcheckdam.pdf

86. Such position is **contrary to the organic law of the land** in the United States and the state of Tennessee and by more than the mere appearance of impropriety creates a constitutional crisis relative to a conflict of interest within the judicial branch of the state and a trust breach.

87. The uniformity of administratively biased actions, instead of challenging the lawfulness of the suspiciously consistent national public health orders failing to identify an infectious agent nationwide, together with that reliance consistency by respondent(s), alerted the relator to another official mistreatment: That these **deleterious foreign adjuncts** — administrative policy and performance merely appearing lawful — are promoting **sustainable governance**, not good government, republican representative in form, and state officials have no lawful authority under their oaths of office, the constitution, nor Tennessee code to operate as if **reflexive law theory were a valid operating paradigm** in the state of Tennessee in serving the people to whom they owe trust obligations.

TR, pp. 18, 19 (emphasis added)

This motion incorporates the petition by reference, relator's notice of judicial department mass fraud of March 24, 2020 (TR p. 339) **EXHIBIT No. 1,** and also the motion for recusal and disqualification to suggest what should be happening amid recusable harms, anticipated as defense against evasions by complicit judicial actors under color of state law.

Respondents' and judicial allies' goal has been the overthrow of constitutional government that stands in the way of reflexive law theory and United Nations'-endorsed ideals of "sustainable development." Judicial acts below by bar association members give the appearance of an interested group united against the claims of constitution and statute made by state of Tennessee, on relation, against relator's enemies, despite at least one oath of office between the two respondents. Denial of relief for his personal rights and the law itself in this case is putting the state of Tennessee on a path toward a constitutional crisis, and a seizing up of the government in which the self-correcting arrangement among the three branches fails to operate, like the freezing up of an automobile engine running full throttle when a last oil drop leaks out.

Supreme court justices are not alone in bar membership. COA Judge W. Neal McBrayer is member of the national group and the TBA. COA Judge Thomas Frierson is a member of the Tennessee Bar Association. Chancery court judge Pam Fleenor is a Tennessee Bar Association member. The attorneys for respondents Janet Kleinfelter and Sharon Milling are TBA members.

The petition is taken true in its report of ABA-backed "deleterious foreign adjuncts." Respondents have not rebutted these sworn statements of fact laid forth in the petition. Actions of the trial court, meeting with approval of the COA, are evidence in this case of first impression that the court system is compromised as a body by alliance with bar association sustainable environmental goals, policies and commitments.

The Tennessee bar association is legally separate from the American Bar Association. Members of the Tennessee group select delegates to the national organization to set policy. "49. *Election of TBA Delegate, ABA House of Delegates.* The TBA Delegates to the ABA House of Delegates shall be elected by a vote of the voting membership of the TBA," Bylaws, Tennessee bar association, p. 8 [3] (emphasis in original).

The court fails to separate itself from the bar association's promotion of an ideology that conflicts with the supreme law. Allowing respondents-in-fraud to continue their Covid-19 project to reset the state authority along a unitary consolidated line, as in a one-party communist state like China, without abating it, under equity or mandamus, for 722 days shows the court cannot be believed to be impartial, unbiased, independent and without prejudice toward state of Tennessee, on relation.

Petitioner's demand for recusal upholds the petition and accounts for his notice of mass department fraud. He alleges fraud on the court. He does it anticipatorily in the petition, as cited above. He gives report of fraud on the court in his aforesaid cited notice on department mass fraud.

The state, on relation, declares that the attorneys and judges involved in this case act as a piece with respondents. They act arbitrarily. They capriciously follow dictates, opinion, policy, advice and interest outside the case, and outside the Tennessee constitution, the Tennessee code annotated, the rules of court (Rule 10, code of judicial conduct) and court precedent, denying relator his rights under constitution and to honest government services by parties subject to statute obeying said law, to not harm relator.

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3 https://s3.amazonaws.com/membercentralcdn/sitedocuments/tnbar/tnbar/0062/1852062.pdf?AWSAccessKeyId=AKIAIHKD6NT2OL2HNPMQ&Expires=1663789326&Signature=z7NXXsKpg1McWAhZ15pvdlfvCGw%3D&response-content-disposition=inline%3B%20filename%3D%22TBA%5Fbylaws%5F060121%2Epdf%22%3B%20filename%2A%3DUTF%2D8%27%27TBA%255Fbylaws%255F060121%252Epdf&response-content-type=application%2Fpdf

Fraud on the court is a grievous matter involving attorneys and judges. The standard is set forth in *Demjanjuk v. Petrovsky,* 10 F.3d 338, 348 (6th Cir. 1993), with

> [T]he elements of fraud upon the court *** consisting of conduct:
>
> 1. On the part of an officer of the court;
> 2. That is directed to the "judicial machinery" itself;
> 3. That is intentionally false, wilfully blind to the truth, or is in reckless disregard for the truth;
> 4. That is a positive averment or is concealment when one is under a duty to disclose;
> 5. That deceives the court.

Through the lens of the five *Demjanjunk* elements, state of Tennessee, on relation, reviews case elements.

1. **On the part of office of trust.** American Bar Association goals are hostile to divided government, strict distinction between branches, high respect for the citizenry under the covenant of the Tennessee constitution. There is the appearance that these officers of trust share in the goals of their professional guild and use offices of trust to promote ideological goals in the complained-of fraud admitted by respondents prior to filing of having disobeyed T.C.A. 68-5-104 in acts of fraud and official misconduct.

2. **"Judicial machinery."** Acts by TBA jurists are directed to delaying, obstructing, impeding, denying relator remedy due him under his due process rights under the state and federal constitutions. The case should have been resolved in favor of the statute in **10 days or less** under the command of (1) the rule of equity and (2) the emergency and peremptory nature of mandamus at T.C.A. § 29-25-102, designed to heal the bloody gash in the body politic put there by the terrorism of respondents and harm to the law itself by their violation. The court is asked to take

judicial notice of the following regarding the harmful effects when the law is seized by private parties against the secured state and federal rights of relator. The U.S. government's vaccine adverse events reporting system (VAERS, run by the FDA) reports that 990 people in Tennessee have perished from the Covid-19 experimental gene therapy shots peddled by respondents. The U.S. government says 12,747 people in Tennessee reported jab harms as of Sept. 21, 2022, in the pharmaceutical product rollout with no or little human testing. [4]

➤ Denial by the court of relator's administrative appeal — a petition for writ of certiorari in substance, albeit not in name, for the court to bring up the case under its plenary inherent original jurisdiction. The petitions for emergency intervention were construed as appeals from a lower court without an order. This case is most extraordinary. Never before has a governor declared martial law and ordered house arrest of hundreds of thousands of people, closed their businesses, shuttered their churches and forced them under fraudulent threat to submit to his pretended orders against their liberties, commerce and travel. The judicial machinery, 30 days after filing when relator demanded relief, refused to function, *pursuant to the interest of the TBA and the ABA in a reset of government overruling the Tennessee constitution*, remarkable in this case without precedent raising existential questions about the republican government guaranteed in U.S. constitution art. 4, section 4.

➤ Failure of bar member judges to recognize a fraud on the court in which breach of oath, violation of duty under § 68-5-104 and mass overthrow of constitutional provisions are visible to relator, and reported in this case of redress of grievances.

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[4] Relator asks the court to take notice of the following data. The underreporting factor of these harms is said by CDC to be 6.5x in a December 2021 paper (https://stevekirsch.substack.com/p/icymi-cdc-just-published-a-paper). Steve Kirsch of the Vaccine Safety Research Foundation calculates the URF at 41x.That means, at the higher figure, the jab for the purported pandemic vaccine in Tennessee has 40,590 deaths, and side effect harms at 522,627 recipients of the Covid-19 inoculation.

3. **Intentionally false, willfully blind to the truth, or is in reckless disregard for the truth.** The trial court and COA have said not a word about equity, injury to the relator, harm to relator of any member of the public, whether from police power exertion among the people without a nonfraudulent exigency, or from practices in mitigation by officials, whether chin diapers, social isolation directives or mRNA experimental inoculation project that in Hamilton County administered more than 509,288 doses as of Sept. 18, 2022. This case is about equity, personal harm, fraud by government employees, and the courts see no equity.

➤ Blindness to the facts of the case entered by relator. Respondents enter no facts, the record shows. Relator facts are in his affidavit of support, TR p. 42. Intentionally blind to facts, chancery and COA deny relator's personal interest in the case, his concrete and personalized harms in the affidavit of support of the petition under the intentionally misapplied *Am. Civil Liberties Union of Tennessee v. Darnell*, 195 S.W. 3d 612 (Tenn. 2006) standard for standing. Denying the facts, being blind to facts, misapplying legal standards to secure injustice are frauds on the court.

➤ Law, equity harmonize to require immediate resolution — denied. The petition, warning of imminent irreparable harm, is ignored as if not an emergency despite "forthwith" commanded by statute at § T.C.A. 29-25-102 for relief, with law and equity harmonizing to insist on instant relief starting with a show cause hearing. Trial court neglect and mismanagement could have been cured by a writ of certiorari from the high court, application for which was made 30 days after filing petition. Denial prolongs the agony of the state, on relation, and her people, in grossly negligent and reckless disregard for the making a determination of the agent of contagion. The violation of law lets executive and judicial branches swallow up the rights of the people as emergency use authorization for untested drugs brings continuing mass harm, with prolongation bringing relator a

retaliatory legal bill from Hamilton County of $10,150 plus $416.82 in costs, totaling $10,566.82.

➤ The judges deliberately ignore T.C.A 68-5-104's claims upon public officials under trust, the ultimate fact of the law rejected in its power to make lawful claim via evidentiary facts in the record upon respondents. According to the courts, (a) no evidence of compliance with the statute exists in the exhibits, and (b) admissions and arguments by respondents-in-fraud that they have no duty to obey the law or have it obeyed by agents are not significant under equity or statute. *Fraud is not avoided in equity court*, and is subsidized under policy corresponding with the ABA devotion unconstitutional and non-constitutional forms and practices. Willful blindness about the ultimate fact of the law is a fraud on the court. The case is premised on evidence as matter of rejection of the law by respondents, and duty to obey its provisions (personally, or by agency).

➤ Deliberately misconstruing petition. The COA construes the petition as principally a petition for writ of mandamus. It says mandamus is relator's sole claim. It considers no lesser stated or implied claim. "The trial court properly found that no Tennessee court has subject matter jurisdiction to issue a writ of mandamus requiring the governor to perform an act and that the trial court therefore did not have subject matter jurisdiction to entertain a petition for a writ of mandamus against Governor Lee. Determining this lack of subject matter jurisdiction to be dispositive of Relator's petition for writ of mandamus against Governor Lee in his official capacity, we affirm the trial court's dismissal of the petition on this basis" (COA, p. 17). The judges declare the petition self-destructs at their feet on alleged grounds of no subject matter jurisdiction. The courts refuse to require respondents-in-fraud to show cause why they have refused to satisfy known legal duties § 68-5-104. They pretend relator is seeking an order to compel Lee to perform an act. An order to a show cause hearing is not commanding an act

of the executive branch per se, but a duty of any person to submit to a court, in this case to give explanation for an admitted violation or breach. It is a fraud on the court for judges to refuse to assert this lawful authority to order a show cause hearing under the mandamus law at T.C.A. § 55-29-102, under standards of which relator has standing.

4. **Concealment amid duty to disclose.** The courts' officers in judicial robe have had duty to disqualify themselves from the beginning of the case, given averments in the petition that directly connect them to the ABA green sustainability agenda of which they are a part that makes it impossible in this extraordinary case for them to be impartial and fair and to hear the law. Their bar association connection is reasonably perceived to materially support their mistreatment of the case shows they are partisans in league with respondents-in-fraud. They exhibit bias, lack of impartiality, prejudice, lack of independence, nonavoidance of fraud by respondents-in-fraud. Secondarily, chancery refuses to consider unrebutted evidence of relator's concrete and particularized harms caused by respondents, and conceals these facts from itself while accepting theories from respondents about standing, alluded to in relator's petition to the court.

5. **Deceiving the court.** The courts are the hall of justice, and the venue for equity, the rule of law and relief against wrongdoers. The court is injured when court officers conspire with unindicted state and county employees pursuing official misconduct and fraud, as if such conduct were state policy and lawful.

   The court is deceived by bar association members working in concert with respondents to destroy equity in Tennessee, destroy the separation of powers, destroy the idea of official duty to obey the law, wreck the peace and tranquility of relator to be free from and not be subject to any policy, official, law, act or claim without there first being a nonfraudulent exigency for an exercise of a police

power against relator, or anyone else in the state without lawful authority in act of executive branch legislation.

The one-sided and biased actions against state of Tennessee's cause, on relation, continue the greatest harm committed in the state's history against her people, and that by government actors in their personal capacity, outside their authority, outside their office, or in official capacity rejecting the law under pretended authority and in fraud.

Bar association lawyers and judges in this case, like respondents, have overthrown constitutional government and equity itself — all within presence of the court, and with judicial permission. They act under the flag of environmental sustainability and an emergency government rewrite of our legal order, protecting the environment and global covenants, agreements, even treaties in the context of the United Nations, as the petition states, taken true and in no way denied by respondents. Lawyer and judge bar association members in this case are on respondents' side. Breach of law, fraud, and fraud on the court are not honest nor permitted ways to bring about major social and political change. Bar members stand against relator, state of Tennessee, and the free people in the state. They blind the court to justice, equity rules and demands of contagion determination at T.C.A. § 68-5-104 and mandamus at T.C.A. § 29-25-102.

The courts below and members of the court, by their connection with the TBA, are disqualified from ruling on this cause, as bar member judges in two courts have. State of Tennessee, on relation, demands to have the case heard by parties without bias, prejudice or agenda as to the course of development of the state and its people, by parties who will obey clearly established law.

ABA and sister organization TBA agree with the non-Tennessee parties and interests that undermine state government and replace it with an administrative biosecurity police state in which there exists no guarantee of the protection of constitutional rights inherent in relator and the people as a whole. For sustainable development and the United Nations agenda to prosper, fraud in Tennessee must continue with cooperation of lawyers and judges joined with the Tennessee Bar Association and the American Bar Association.

Relief sought

Relator objects to the order denying recusal of four justices. By this affidavit and motion he demands recusal of the court on the grounds of bar association membership as additional material evidence of its members commitment to respondents' fraud in the rejection of T.C.A. § 68-5-104, the clearly established law upon state of Tennessee, which commitment is evidence the members of the supreme court are prejudicially and visibly biased against state of Tennessee, on relation.

Respectfully submitted,

David Jonathan Tulis

State of Tennessee ex rel. David Jonathan Tulis

STATE OF TENNESSEE, COUNTY OF HAMILTON — I, the undersigned Notary Public, do hereby affirm that David Jonathan Tulis personally appeared before me on the 26th day of September 2022, and signed this affidavit as his free and voluntary act and deed.

CHARLOTTE G. OLSON
STATE OF TENNESSEE NOTARY PUBLIC
HAMILTON COUNTY

Charlotte Olson

my commission expires 7-7-2024 Notary Public

CERTIFICATE OF SERVICE

David Jonathan Tulis certifies that a true and exact copy of this petition is being sent by email as an attachment to the parties below this Monday, the 26th day of September, 2022, at their respective email addresses.

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David Jonathan Tulis

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