

IN DAVIDSON COUNTY CHANCERY COURT

State of Tennessee)	
<i>ex rel.</i> David Jonathan Tulis)	
<i>Relator</i>)	Case No. 25-0378-II
)	
V.)	
)	
David Gerregano)	Chancellor Anne Martin
Commissioner of revenue)	Division II
)	
Jeff Long)	ORAL ARGUMENT DEMAND
Commissioner of safety)	
<i>Respondents</i>)	

Motion for Rule 9 interlocutory appeal

The trial court on April 29, 2025, issues an order denying plaintiff's motion for a temporary injunction in the case challenging respondent commissioners' use of the Tennessee financial responsibility law of 1977 ("TFRL") as grounds for a mandatory insurance program alleged to make every registered motor vehicle owner liable for performance.

The challenged program is a fraud serving the insurance industry that creates 40,832 criminal convictions a year among Tennesseans, mostly among the poor, who opt to pay for food, rent, health care, car repair, tuition, childcare and other necessities and are noncustomers of the insurance industry. The center of the law is the motor vehicle liability policy. Its certificate is the focus of the TFRL and the object of surveillance of the electronic insurance verification system ("EIVS"), created in the Atwood amendment to the law taking effect Jan. 1, 2017.

The order follows up on statements the chancellor makes April 10, 2025, at a hearing in which state of Tennessee on relation argues for injunctive relief on his own behalf, with

one or more auto tags revoked, and on behalf of 1 million noncustomer poor who register their autos as motor vehicles with department of revenue.

The court's nonjudicial reasoning is personal and largely nonjudicial. It reflects personal doubt, speculation about administrative impacts of a temporary restraining order, exhibits ethically impermissible fear or favor of man. The court disregards unambiguous statutory requirements in relator's brief in support of injunction, overlooks analysis in the verified amended complaint, denies irreparable continuing harm to relator, and considers not the harm done by police power exercised without warrant upon the public. It looks rather at feared harm to revenue if it stops sending out 12,000 dunning letters every week to industry noncustomers not required to obtain SR-22 coverage.

The suit demands decertification of EIVS. Its job is to monitor every holder of an SR-22 certificate covering motor vehicle liability policies defined at T.C.A. § 55-12-102(7). Relator is suing to abate personal and public harm by getting respondents to run EIVS pursuant to T.C.A. § 55-12-102 *et seq* and § 55-12-201 *et seq* and to corral police power exercise to comply with T.C.A. § 55-12-139, which law is used to prosecute respondents' victims but which does not constitute a rewrite of the financial responsibility law to convert it into a mandatory insurance law.

Relator follows Rule 9 list of grounds for review and relief. His brief in support is incorporated into this motion for interlocutory relief as well as appendices containing relevant record for this motion.

Respectfully submitted,



State of Tennessee ex rel. David Jonathan Tulis

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and exact copy of this motion has been placed in the U.S. mail with sufficient postage to assure delivery first class, or sent my e-mail to respondents' attorneys this Thursday, April 31, 2025.

David Gerregano, commissioner

Nick Barca

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Jeff Long, commissioner

Hollie R. Parrish

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/s/ David Jonathan Tulis

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Brief in support of demand for interlocutory appeal

No material facts are in dispute in this case over statutory construction. State of Tennessee on relation requests the trial court exercise its discretion to grant review to the Tennessee court of appeals as to whether relator has right to immediate relief in the extraordinary cause he brings to light, a joint venture by two state commissioners to extort the public in the interest of for-profit insurance companies apart from law.

Their program is fairly likened to one requiring every Tennessee man to be on the sex offender registry — apart from adjudication — because he has sex organs and might commit a crime. The registry monitors sex offenders after a “court’s acceptance of a defendant’s entry of a plea of guilty or a finding of guilt by a jury or judge after trial.” T.C.A. § 40-39-212.

The Tennessee financial responsibility law of 1977 (“TFRL”) has a registry, too. Not every vehicle owner is to be on that list. The electronic insurance verification system (“EIVS”) monitors the high-risk adjudicated driver license-suspendee who is insured mandatorily under a motor vehicle liability policy, *certified* under the SR-22 form.

1. Background

2. The question before the court is whether it will honorably shut down the “Eye of Sauron” program to halt continuing irreparable injury to relator and continuing irreparable harm upon innocent members of the public.
3. Or will it maintain respondent Gerregano’s claim in his July 21, 2023, suspension notice? **EXHIBIT No. 30**, Vehicle registration suspension notice, July 21, 2023, for 2000 Honda Odyssey minivan. Here he claims department of revenue (“revenue” or “DOR”) is “unable to verify that acceptable insurance coverage is currently in place” and that relator “must purchase liability insurance” to “provide evidence of insurance coverage.”
4. Respondent Gerregano’s action against relator arises from a claim for which no relief may be granted. His attack on relator is without authority or foundation.
5. Mr. Gerregano’s demand for “acceptable insurance coverage” under “evidence” is in violation of TFRL and its evidence rules giving authority over the **motor vehicle liability policy** defined at T.C.A. § 55-12-102(7), the contents of which are described at T.C.A. § 55-12-129 and -122, which policy carries the industry standard SR-22 form. See amended complaint p. 68. **APPENDIX No. 4**. Amended verified complaint on fraud, oppression, injunction demand
6. Law puts his authority upon the “**financial responsibility insurance certificate**” at T.C.A. § 55-12-126. This evidence or proof shows an insurance carrier has “certified a motor vehicle policy” § 55-12-123, a policy “certified as proof of financial responsibility,” § 55-12-126 (“POFR”). The SR-22 is “acceptable evidence of security, proof of financial responsibility” and is “written proof” of financial responsibility. § 55-12-137.
7. **DEFINITION.** “‘Motor vehicle liability policy’ means an ‘owner’s policy’ or ‘operator’s policy’ of liability insurance, **certified** as provided in § 55-12-120 or §

55-12-121 as **proof of financial responsibility**, and issued, except as otherwise provided in § 55-12-121 by an insurance carrier duly licensed or admitted to transact business in this state, to or for the benefit of the person named therein as insured.”

8. At scene of an accident, an officer may request insurance information from the parties and make note of it. “Any motor vehicle officer *** may have the parties exchange insurance information, which would include the name of each party’s insurance company and the location of an agency of the insurance company. Reports prepared by a law enforcement officer shall include information pertaining to the insurance policy, including the name of the insurance company, if known, of each person involved in the accident.” § 55-10-108.
9. The officer treats a party subject to TFRL differently: “[A] copy of the [motor vehicle liability policy] certificate shall be included in the report.”

If a person has a **certificate of compliance** with the Tennessee Financial Responsibility Law of 1977, compiled in chapter 12 of this title, issued by the commissioner of safety, a **copy of the certificate shall be included** in the report.

§ 55-10-108. Accident reports; public inspection; unauthorized use of information; crimes and penalties; private right of action (emphasis added)

10. In obtaining a driver license, relator states he “[understands] about Tennessee’s financial responsibility law” and “[agrees] to abide by it.”
11. Relator has not had a qualifying accident under T.C.A. § 55-12-104 and -105. Nor is he under claim of unsatisfied judgment nor court order. T.C.A. § 55-12-102(4). He is not in position to “abide by [the financial responsibility law].” Respondent Gerregano’s command to purchase “acceptable insurance coverage” is an impossibility for relator.

12. The SR-22 certified motor vehicle liability policy is sold to a person under privilege suspension, and required of such person.
13. Relator is not such person required to show POFR or carry in his vehicle proof or evidence of POFR.

2. Record establishing grounds for relief

14. To set the record that is the basis of this appeal for interlocutory relief, relator provides the chancery court a record establishing the basis for injunction, which grounds are statutory construction under the rule of law.
15. The case record attached contains:

APPENDIX No. 1 Summary of the rules of statutory construction

APPENDIX No. 2 Excerpts from April 10, 2025, hearing, quoting Chancellor Anne Martin

APPENDIX No. 3. Order denying motion for injunction entered April 29, 2025

APPENDIX No. 4 Amended motion to reconsider & decertify

APPENDIX No. 5 Amended verified complaint on fraud, oppression, injunction demand. Exhibits omitted

APPENDIX No. 6 Amended motion for preliminary injunction

APPENDIX No. 7 Amended Brief in support of motion for injunction

APPENDIX No. 8 Draft order of preliminary injunction

16. The most summary reading of the case is the six-page draft order for injunction that gives a comprehensive review of TFRL and how injunction relieves continuing personal injury to relator and to the public. **APPENDIX No. 8.** The certification requirement central to the law is focus of Amended brief in support of preliminary injunction. **APPENDIX No. 6.**

17. Relator includes Amended verified complaint on fraud, oppression, injunction demand. **APPENDIX No. 5.** Its no-stone-unturned treatment of TFRL includes particulars from IICMVA, the Insurance Industry Committee on Motor Vehicle Administration, the standards of which by law control operation of EIVS.
18. This record is the basis for relator's claims in this suit. This case has no material facts in dispute, and will be decided according to the rules of statutory construction.

3. Interlocutory appeal grounds

19. The court in a hearing April 10, 2025, denies state of Tennessee's motion on relation for injunctive relief. Stated grounds are given orally, as transcribed by relator from the video file of the hearing supplied by the Davidson County court system. **APPENDIX No. 2**
20. Relator files Amended motion to reconsider & decertify Friday, April 25, 2025. **APPENDIX No. 3**
21. The court enters a written order denying the injunction on April 29, 2025. **APPENDIX No. 4**
22. In the 20 months since July 23, 2023, when relator began demanding relief, 68,000 Tennesseans apart from law have been criminally convicted, most among the poor. ¹ Relator alleges respondents use T.C.A. § 55-12-139 to harm these men and women (1) in a manner unconstitutional in purported application of the law and (2) as official oppression under T.C.A. § 39-16-403.
23. Rule 9 controls requests for interlocutory relief, with "the character of the reasons that will be considered" as follows:

¹ This figure is based on data respondents supply every year to the general assembly as to how successful the electronic insurance verification system operates under Part 2 — Insurance Verification Program ("James Lee Atwood Jr. Law").

(1) the need to **prevent irreparable injury**, giving consideration to the **severity** of the potential injury, the **probability** of its occurrence, and the probability that review upon entry of final judgment will be ineffective;

(2) the need to prevent needless, expensive, and **protracted litigation**, giving consideration to whether the challenged order would be a basis for reversal upon entry of a final judgment, the **probability of reversal**, and whether an interlocutory appeal will result in a net reduction in the duration and expense of the litigation if the challenged order is reversed; and

(3) the need to develop a **uniform body of law**, giving consideration to the existence of inconsistent orders of other courts and whether the question presented by the challenged order will not otherwise be reviewable upon entry of final judgment.

Tenn. R. App. P. 9 (emphasis added)

A. Continuing irreparable harm to relator

24. The court's order allows respondents to continue imposing continuing irreparable harms upon relator in three ways:

- He is denied use of property for which privilege taxable activity fees were up to date;
- He bears continual risk of arrest and prosecution in use of his property under color of T.C.A. § 55-12-139;
- Denial of use of an automobile or of a motor vehicle that is one's personal or family property is a civil death sentence;

25. The civil death sentence is recognized by U.S. district court judge Aleta Trauger in Robinson v. Purkey, 326 F.R.D. 105, 156 (M.D. Tenn. 2018) in which any interruption of a poor person's right to the privilege is viewed as unjust and harmful. The dilemma of a poor person is discussed in the context of department of safety's ("DOSHS") revoking driver licenses of people too poor to pay court debt.

The damage that the lack of a driver's license does to one's employment prospects is just the beginning. Being unable to drive is the equivalent of a recurring tax or penalty on engaging in the wholly lawful ordinary activities of life—a tax or penalty that someone who committed the same traffic violation, but was able to pay her initial traffic debt, would never be obligated to pay. When the State of Tennessee takes away a person's right to drive, that person does not, suddenly and conveniently, *stop having to transport oneself and family members to medical appointments, stop having to report to court dates, or stop having to venture into the world to obtain food and necessities*. Maybe public transportation will work for some of those activities some of the time, and maybe it will not. Similarly, while some individuals with suspended licenses may be able to rely on family or charitable assistance for some purposes, there is no reason to conclude that such options will be available or adequate in most cases. What, then, is a person on a suspended license to do? The lawful options are simple: she can *simply forgo the life activities, no matter how important, for which she cannot obtain adequate transportation, or she can incur additional transportation expenses*—making herself that much less likely ever to satisfy her traffic debt.

Of course, an indigent person with a suspended license has another option, besides accepting the practical limitations that the state has placed on her: she can, *faced with the need to navigate the world and no feasible, affordable, and legal option* for doing so, break the law and drive.

Robinson v. Purkey, 326 F.R.D. 105, 156 (M.D. Tenn. 2018) (emphases added)

26. Relator suffers the injury of threat of arrest in use of either of two family-use automobiles the status of which has been revoked as motor vehicle, and this is an irreparable harm. Standing to sue is on revocation of a Honda Odyssey minivan.
27. The charge he faces is criminal “driving on suspended registration” and “no proof of financial responsibility” under §55-12-139. Imposition of risk of arrest under color of law is a harm and a tort.
28. Mr. Long’s department keeps all records, and runs the department’s financial responsibility division. Relator is being defamed by Cmsr. Gerregano’s false report

regarding his record as a good driver, which good record is an essential element in relator's interest and title in his good name..

29. Respondent Long neglects to rebuff Cmsr. Gerregano's slander and allegation against relator's good name and record, nor to correct him for revoking relator apart from DOSHS' request or notice. T.C.A. §§ 55-12-104, -114. See **EXHIBIT No. 29**. Affidavit of relator as to harms caused by slander, suspension of motor vehicle tag
30. Respondents do not recognize nonprivileged use of an automobile, or private use apart from privilege taxable activity. Nor do respondents and their privies handle disputes regarding driver licenses and registrations administratively under T.C.A. § 4-5-101 *et seq*, the uniform administrative procedures act, but under criminal authority. They and those complying with their policy operate upon a presumption that all travel is commercial, which presumption relator rebuts.
31. Respondent suggestion at the April 10, 2025, hearing that relator avoid these the peril of false imprisonment and false arrest by simply buying insurance ignores the verified fact of poverty. Doing so would void standing, moot the case.

B. Continuing irreparable harm to public

32. Respondents' program of purported general obligation to buy auto insurance generates 40,823 convictions annually. That's 112 convictions per day, including Saturdays and Sundays. That's 56 men and women criminally convicted before the court goes to lunch, and 56 after.
33. This harm is not just possible or probable. It is severe and actual.
34. These people criminally prosecuted pursuant to respondents' lawless program are not involved in a qualifying accident under T.C.A. § 55-12-104 and -105. They are not under a court judgment. T.C.A. § 55-12-114.

35. Denial of injunction injures the good and honorable financial responsibility law itself. The disputed EIVS program sought to be decertified breaches the division of powers giving the legislature role in making law, the breach being an executive bench employee makes law and simultaneously administers it.

C. Uniform body of law grounds

36. This petition is intended to uphold the uniformity of law in Tennessee, the rudiments of the rules of statutory construction.

37. Specifically this cause stands on the rule *ejusdem generis*, “when a general term follows a specific one, the general term should be understood as a reference to subjects akin to the one with specific enumeration.” Norfolk & W. Ry. Co. v. Am. Train Dispatchers Ass’n, 499 U.S. 117, 129, 111 S. Ct. 1156, 1163, 113 L. Ed. 2d 95 (1991), or where “a more specific statutory provision takes precedence over a more general provision,” with judicial rules noting “[a] construction which places one statute in conflict with another must be avoided” Graham v. Caples, 325 S.W.3d 578, 582 (Tenn. 2010).

38. This rule, plus respondent duty to read law *in pari materia*, awaits court endorsement. The rules are not amenable to being pretermitted, sidelined or rendered nugatory because the court wants to avoid offense or show bias or favor.

39. **APPENDIX No. 1** summarizes the rules of construction on which relator relies to defend the Tennessee financial responsibility law of 1977. The rejection of this law injures the public; compliance with the law does no injury to respondents.

D. Avoid protracted litigation

40. This is a statutory construction case. The cause promises to be a “needless, expensive, and protracted litigation” if the court doesn’t uphold the Tennessee financial responsibility law after reading it.

4. Court's actions as grounds for petition

41. In Amended motion to reconsider & decertify, **APPENDIX No. 3**, the state on relation gives its grievance against denial of its demand. It cites irrelevant factors the court uses to deny injunction in favor of mercenary interest.
42. “In this case, however, the assistant district attorney general’s consideration of a clearly irrelevant factor, and his focus on the nature and circumstances of the offense rather than the defendant’s amenability to correction, created an issue appropriate for interlocutory appeal. In addition, at the time of this defendant’s application for interlocutory appeal pursuant to Rule 9, there existed a need to develop a uniform body of law regarding a prosecutor’s consideration of factors that are irrelevant to his or her determination of whether to grant pretrial diversion.” State v. McKim, 215 S.W.3d 781, 790 (Tenn. 2007)
43. The court’s denial order states relator has not “met his burden at the temporary-injunction stage to show a likelihood of success on the merits,” that “there are many legal questions” as to Long’s pending motion to dismiss, that “the Court has questions about the administrative appeals of the suspensions of the registrations of the two vehicles” of relator and “whether those proceedings are the appropriate places for Plaintiff to seek relief,” that the court is “*not convinced of the legal claims*” in the amended complaint, that the “relief sought is broad and sweeping” and “would have a major impact on some significant programs administered by the State.” (see **APPENDIX No. 4**, Order denying motion for injunction, pp. 2, 3).
44. In oral statements April 10, 2025, is this statement:

The Court finds that the **plaintiff has not met his burden** at the temporary injunction stage to show a likelihood of success on the merits. **There are many legal issues in question.** ***

The court is **not convinced on the legal claims** that the plaintiff has brought to support the grant of extraordinary relief that is being sought in this case, extraordinary relief because it's injunctive. **But also it is broad. It is sweeping. It is significant. It will have a major impact on some significant programs administered by the state.** And the court is just not convinced that the plaintiff **will succeed on his claims.** [emphases added]

45. Highlights of the court's oral presentation are **APPENDIX No. 2.**

46. The ignores TFRL's requirement for a person liable for compliance with the law to obtain, as condition precedent for retaining the privilege, a motor vehicle liability policy defined at T.C.A. § 55-12-102(7), and that only certified policies are of interest to the framers of the law.

47. The court ignores the certification of EIVS at T.C.A. § 55-12-212 that EIVS operate according to its purpose at T.C.A. § 55-12-202, that being to verify the motor vehicle liability policy of a person subject to performance.²

48. The court reflects an improper concern for matters outside the scope of judicial analysis in a case involving statutory interpretation, accepts admitted deviations and ongoing violation of law, denies oppression and equity relief.

² The purpose of this part is to develop and implement an efficient insurance verification program that utilizes the online **verification system** and data transfer standards for transmitting a full book of business specifications, model, and guide of the Insurance Industry Committee on Motor Vehicle Administration in order to verify whether the **financial responsibility requirements** of this **chapter** have been met with a **motor vehicle liability insurance policy**, and to provide the commissioner of revenue with the authority to develop, implement, and administer the program.

49. It is not within the discretion of the lower court to deny injunctive relief when the record of deviation from EIVS' certification is manifest and not denied under respondents' motions to dismiss.

50. The court's concerns are administrative consequence and institutional disruption — improper and unjust concerns.

5. Questions seeking certification

51. State of Tennessee on relation asks the court to certify the following interlocutory questions of urgency to relator and of critical public importance:

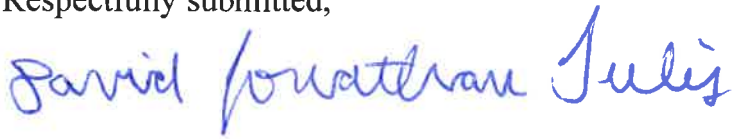
- i. ➤ Whether the court's rationale for denying motion for injunction is proper exercise of discretion. Given that no material facts are in dispute, and given that the questions are purely in the reading of the law, relator seeks interlocutory review in denial of his motion for injunction.
- ii. ➤ Whether TFRL takes interest in the certified motor vehicle liability policy defined in T.C.A. § 55-12-102(7), and which provision regulates non-certified ordinary owner's and operator's policies as listed in T.C.A. § 55-12-122(a) and (b).
- iii. ➤ Whether relator has right to extraordinary relief of temporary restraining injunction, given that respondents' program of (1) mass tag revocations and (2) criminal prosecutions under T.C.A. § 55-12-139(a) are premised on a misconstruction of the sentence, "This part shall apply to every vehicle subject to the registration and certificate of title provisions" under the rule *ejusdem generis*, on which relator relies as protective of his cause.
- iv. ➤ Whether respondent Gerregano's certification of the Jan. 1, 2017, launch of EIVS is valid, given 29 unrebutted abrogations of law evidenced in the verified amended complaint regarding misconduct in the system's use.

- v. ➤ Whether said certification must be declared invalid, and EIVS operation made to cease until DOR's search parameters of insurance companies' full books of business comport with law.

52. Given the foregoing, relator respectfully requests the court to certify these questions for review by the court of appeals.

53. State on relation demands the matter be handled forthwith, given the scale of the harms perpetrated and the extraordinary nature of this cause.

Respectfully submitted,



State of Tennessee ex rel. David Jonathan Tulis

EXHIBITS

EXHIBIT No. 30. Vehicle registration suspension notice, July 21, 2023, for 2000 Honda Odyssey minivan



Affidavit of David Jonathan Tulis

As to harms caused by slander, suspension of motor vehicle tag

I, David Jonathan Tulis, relator, being of sound mind and body, testify that I live in Hamilton County, Tenn., at 10520 Brickhill Lane, Soddy-Daisy. I testify to the following facts to the best of my knowledge, recollection and in consultation with records.

1. Affiant is relator in the case *State of Tennessee ex rel. David Jonathan Tulis v. Jeff long et al* in which he sues for relief against maladministration of the Tennessee financial responsibility law of 1977.
2. Commissioner of revenue David Gerregano suspends registration tag on his 2000 Honda Odyssey minivan in July 2023.
3. Suspension of the privilege is an injury to affiant and he fears will impose further injury upon him.
4. He is denied the right to travel in this automobile and use it as a motor vehicle under privilege, meaning he cannot use it for private profit and gain in any agreement in which he carries goods or people for hire, with the roadway itself being the place of business, for which privilege taxable activity he must by law display a valid registration tag on the back bumper as proof of privilege tax paid.
5. Secondly, he is denied the right to use the automobile as a private conveyance, a personal automobile for necessity and convenience purposes and for the exercise of his rights.
6. That is because state troopers, Hamilton County sheriff's deputies and police officers in the municipalities through which he travels enforce the motor vehicle laws upon all users of roads thrown open to public vehicular traffic and travel.
7. Officers enforce traffic laws using criminal authority. They do not refer a person with a revoked tag to proceedings under the Tennessee uniform administrative procedures act ("UAPA") at Tenn. Code Ann. § 4-5-101, though the matter as civil and administrative, and all controversy over a state license is subject to UAPA.
8. Affiant is a journalist who does extensive reporting on police and courts.
9. He is familiar with police practices that violate due process rights, and that such practices are endemic statewide.
10. Police, deputies and troopers operate an attainder anyone using the roads privately, seizing them as outlaw and arresting them without warrant.

11. If an arrest is to occur over a motor vehicle license, T.C.A. § 40-7-103, the warrantless arrest law, requires it be under an arrest warrant, as such offense is not a public offense and is moreover is subject to administrative hearing under UAPA.

Defamation, slander harms

12. To revoke his tag apart from law is a slander, a defamation, a slur, calumny, disparagement and maligning of his person.
13. The falsehood of Commissioner Gerregano is a smear broadcast statewide to law enforcement agencies.
14. These parties, under custom and usage, are ready to accuse, arrest, criminally charge and to prosecute affiant, who has violated no law nor breached the peace.
15. This defamation occurs around the record Mr. Gerregano makes about affiant.
16. The false record is that affiant is subject to verification of a duty to have evidence or proof in the form of the SR-22, required of person adjudicated to be irresponsible under the the financial responsibility law and thus required to obtain a "motor vehicle liability policy" as defined in T.C.A. § 55-12-102.
17. Affiant is in no way obliged to obtain the SR-22 certificate or fall under surveillance of EIVS. Nor is affiant under duty to buy auto insurance.
18. EIVS is used to put affiant in a false light, to smear him and accuse him of exercising the privilege when it is forbidden, which slander also will certainly lead law enforcement officers to seize, cuff, jail and prosecute affiant-relator in exercise of protected, inherent, unalienable and constitutionally guaranteed rights.

Further affiant sayeth naught.

David Jonathan Tulis

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 19th day of April 2025, and signed this affidavit as his free and voluntary act and deed.

Danyell B. Luster

Notary Public



STATE OF TENNESSEE
DEPARTMENT OF REVENUE

July 21, 2023

VEHICLE REGISTRATION SUSPENSION NOTICE

DAVID JONATHAN TULIS TTEE UDT 8 15 22
10520 Brickhill Ln
Soddy Daisy, TN 37379-5230

Coverage Failure Fee \$125

Go to www.DriveInsuredTN.com to pay fee
and confirm proof of insurance coverage

Vehicle ID # (VIN): 2HKRL1859YH575510

Plate: 774BGWC

PIN: VBUUMWUG

Dear: DAVID JONATHAN TULIS TTEE UDT 8 15 22

The Tennessee Department of Revenue is authorized to suspend the registration of a vehicle for any of the reasons set forth under TENN. CODE ANN. § 55-5-117(a)(1)-(5) (2015). While our records indicate that the VIN listed above has an active Tennessee registration, we are unable to verify that acceptable insurance coverage is currently in place.

Your insurance status: You have been assessed \$125 in coverage failure fees, and your vehicle registration has been suspended. Two separate notices have been mailed to your attention on previous dates notifying you of the coverage failure fees associated with failure to provide proof of insurance coverage or a verifiable exemption.

Consequences of suspension: This letter serves as official notice that you may not drive your vehicle while your registration is suspended. Driving a vehicle without a current registration is a Class C Misdemeanor (T.C.A. § 55-3-102). Tennessee law requires registration of all vehicles operating on the streets or highways of the state (T.C.A. § 55-4-101).

How to reinstate your vehicle registration: In order to reinstate your vehicle registration, you must purchase liability insurance for your vehicle, provide evidence of insurance coverage, and pay all coverage failure fees associated with the suspension of your vehicle. Visit www.DriveInsuredTN.com to provide proof of insurance, and pay the associated fees to reinstate your registration. The above VIN and PIN will be needed to complete the information.

How to challenge this suspension: You may request a hearing to challenge this suspension under the Uniform Administrative Procedures Act by submitting a written request for a hearing within 10 days of the date of this letter. The scope of the hearing is limited to whether the Department of Revenue's Vehicle Services Division properly undertook this action based on the record and the law.

Requests for an administrative hearing must be submitted in writing to the Tennessee Department of Revenue at the following address: Hearing Office, Andrew Jackson State Office Building 11th Floor, 500 Deaderick Street, Nashville, TN 37242.

For further information, please visit us at www.DriveInsuredTN.com, send us an email at Insurance.Verification@tn.gov or speak to a customer service representative at 615-741-3101, option 2.