
MAYFLOWER DISTRICT COURT

KOZJANI
Plaintiff(s),
v.
STATE OF MAYFLOWER
Defendant(s).

Case No. EX-0096-24
Presiding: Krabzatonin
**PETITIONER STATEMENT IN
OPPOSITION OF STATE’S RESPONSE**

INTRODUCTION

Your Honor, I respectfully submit this statement in support of my petition for expungement. I acknowledge the State’s opposition to my request but firmly believe that granting the expungement is both appropriate and just under the circumstances.

ARGUMENT

1. **Professional Rehabilitation and Future Contributions to Society**

I aspire to return to law enforcement, the legal field, and eventually to serve as an attorney or public defender. I am committed to upholding justice and aiding the public, particularly those who are underprivileged or marginalized. Granting this expungement will allow me to rebuild my career and contribute meaningfully to society by ensuring that justice is served and rights are protected. In my career I have surpassed many positions, I have been the Lieutenant of the Lander Police Department I&I and IA, Chief Public Defender of the District Court of New Haven County and many more positions with the Original NHC. The expungement would remove a barrier preventing me from fulfilling my professional goals that I have with Clarke County.

2. **Dismissal of the Underlying Criminal Case**

The criminal case referenced in the State’s opposition was dismissed **with prejudice**. This dismissal signifies the court’s recognition that the case should not and will not be prosecuted further. As such, the case has no bearing on my character or my ability to reintegrate into the legal profession. The dismissal with prejudice was not arbitrary; it reflects the fact that the case lacked the necessary merit to proceed.

3. **No Connection Between the Expungement Request and the State’s Concerns**

The State’s argument hinges on the pendency of a motion to reconsider judgment in a separate criminal matter. However, that case is distinct and has no material relation to the issues raised in my expungement petition. Furthermore, the judgment in question does not pertain to the charges that were dismissed with prejudice, and as such, it should not serve as an impediment to the expungement of my record. Just to note, the charges that I have: Running a stop sign? Driving a commercial vehicle **without** a CDL (**while this vehicle was not required to possess a CDL until the developers have adapted it in game, they have agreed on my terms, So this law**

could not be upheld. Evidence is within my possession.) And the last incident being a felony hit and run which was an accident Your Honor, which I can not prove via video evidence yet only provide you with my words of honesty.

4. **Balancing Public Interest with Personal Rehabilitation**

Expungement would not harm the public interest. On the contrary, it would allow me to move forward and contribute to the community as a professional in the field of law, assisting others to navigate the justice system. Preventing my ability to do so based on unrelated matters or resolved issues undermines the principles of fairness and rehabilitation that are central to our justice system.

5. **State v. Clay**, 523 S.W.3d 797 (Mo. Ct. App. 2017).

In this case, **Clay** was charged with a crime, but the charges were eventually dismissed. After the dismissal, he sought to have his criminal record expunged. **The Missouri Court of Appeals ruled that an individual whose criminal charges had been dismissed could still file for expungement, as long as there were no pending charges or convictions at the time the expungement petition was filed.** As with respect I have filed the expungement **AFTER** the sought ruling of my criminal matter had been published by the Judge. It is with this expungement that we are discussing over charges that are not in line with any other matter, it is therefore that I had respected the court to be able to make a fair ruling for after that I an attempt to expunge records that have nothing to do with the criminal matter Mr. Xolaaz was referring to.

6. **Conclusion**

Your Honor, I respectfully ask this Court to **grant my request for expungement.** I have demonstrated in words to you my commitment to rehabilitation and service, and I seek the opportunity to rebuild my life and career without the undue burden of a criminal record that no longer reflects my circumstances or potential. I am awaiting the ruling of this expungement to further proceed and request for my LETI license to be transferred in which I had obtained in original New Haven County 2018, next to that will I be redoing my BAR exam which I had already previously passed with New Haven County, yet would need to redo here.

I thank the Court for its time and consideration of my petition.

Date: 17 Nov 2024

Kozjani
Petitioner of Record

A handwritten signature in black ink, appearing to read 'Kozjani', with a large, stylized loop at the beginning.

