No. _____

IN THE SUPREME COURT OF THE UNITED STATES

JEROME GIBSON,

Petitioner,

v.

SECRETARY OF PENNSYLVANIA DEPARTMENT OF CORRECTIONS; SUPERINTENDENT SCI-GREENE; ATTORNEY GENERAL PENNSYLVANIA; and DISTRICT ATTORNEY BUCKS COUNTY.

Respondents.

On Petition for Writ of Certiorari to the
United States Court of Appeals for the Third Circuit

PETITION FOR WRIT OF CERTIORARI

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Dated: July 12, 2018

QUESTION PRESENTED

In *de novo* review of a *Brady* claim, where the Commonwealth suppressed evidence of inducements provided to its witnesses, may a court find the suppression immaterial without considering whether "the defense could thus have used [the suppressed evidence] to throw the reliability of the investigation into doubt and to sully the credibility of [the police]" under *Kyles v. Whitley*, 514 U.S. 419, 447 (1995)?

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PETITION FOR WRIT OF CERTIORARI

In this federal habeas proceeding under 28 U.S.C. § 2254, Petitioner Jerome Gibson respectfully prays that a writ of certiorari issue to review the ruling of the United States Court of Appeals for the Third Circuit affirming the District Court's denial of habeas relief.

OPINIONS BELOW

On December 22, 2017, the United States Court of Appeals for the Third Circuit affirmed the denial of Mr. Gibson's habeas petition and, on February 12, 2018, it denied his application for panel and *en banc* rehearing. *Gibson v. Secretary, Pa. Dept. of Corr., et. al.*, No. 16-1729 (3d Cir.), App. J & K.[1]

The United States District Court for the Eastern District of Pennsylvania denied the petition for a writ of habeas corpus. *Gibson v. Beard*, 165 F. Supp.3d 286 (E.D. Pa. 2016), App. H.

During state post-conviction proceedings, the Pennsylvania Superior Court denied relief, stating it did not have jurisdiction over the claim. *Commonwealth v. Gibson*, No. 584 EDA 2014 (Pa. Super. Jan. 16, 2015) (unpublished), App. F.

STATEMENT OF JURISDICTION

This Court has jurisdiction under 28 U.S.C. § 1254(1). The judgment of the court of appeals was entered on December 22, 2017, and the Third Circuit denied panel rehearing and rehearing *en banc* on February 12, 2018. Justice Alito granted Petitioner an extension of time to file this petition for writ of certiorari, permitting him to file it on or before July 12, 2018. This petition is timely filed.

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[1] Opinions in the Appendix are denoted as App. __

STATUTORY AND CONSTITUTIONAL PROVISIONS INVOLVED

This case involves a state criminal defendant's constitutional rights under the Fifth and Fourteenth Amendments:

The Fifth Amendment to the United States Constitution provides in relevant part: "No person shall . . . be deprived of life, liberty, or property, without due process of law . . . ."

The Fourteenth Amendment to the United States Constitution provides in relevant part: "[N]or shall any State deprive any person of life, liberty, or property, without due process of law . . . ."

STATEMENT OF THE CASE

The Court of Appeals granted Petitioner a Certificate of Appealability ("COA") to address 14 claims that the prosecution suppressed evidence in violation of *Brady v. Maryland,* 373 U.S. 83 (1963), a claim that Mr. Gibson's trial counsel was ineffective and a cumulative error claim.

The undisclosed *Brady* evidence shed light on hidden police methods to obtain inculpatory statements and an array of coercive tactics and inducements the prosecution used to procure the cooperation of witnesses: large monetary payments, physical coercion, the threat of criminal charges, movement of an incarcerated witness to a preferred facility, plea arrangements, sentencing considerations, instructions not to talk with anyone, the declination to bring charges, and related inducements. Counsel could have used the suppressed evidence to bolster trial evidence that the prosecution witnesses framed Petitioner. Moreover, the *Brady* evidence would have provided the backbone for trial counsel's closing argument that Petitioner's case was a giant get-out-of-jail-free card for informants and that the Commonwealth used coercion to gain favorable testimony.

The Third Circuit concluded that these claims either were not *Brady* violations or not material. *Gibson v. Secretary, Pa. Dept. of Corr.*, No. 16-1729 (3d Cir. Dec. 22, 2017) (non-precedential), App. J. Petitioner requests that the Court grant a writ of certiorari because the Court of Appeals' opinion did not address how Petitioner could have used the *Brady* violations to "attack[] the reliability of the investigation" conducted by the prosecution and its agents. *Kyles v. Whitley*, 514 U.S. 419, 446 (1995). Furthermore, the appeals court's decision mirrored the deficiency test that *Kyles* rejected.

1. FACTUAL AND PROCEDURAL BACKGROUND

Mr. Gibson was convicted of first-degree murder and spent twelve years on death row before his death sentence was vacated pursuant to *Atkins v. Virginia*, 536 US 304 (2002). He now is serving a mandatory life sentence for his conviction in this case, which the Court of Appeals recognized involved suppressed evidence "of a highly probative nature." *Gibson*, slip op. at 11, App. J.

A. The Trial.

Mr. Gibson was charged with capital murder, robbery, and possessing an instrument of crime in connection with the 1994 fatal shooting of Robert Berger at his workplace in Bristol Borough, Pennsylvania. No physical evidence connected Mr. Gibson to the crime. The prosecution's theory was that Mr. Gibson committed a robbery and homicide to get money to purchase a car the following day. NT 3/9/95, 326; NT 3/13/95, 32. However, the prosecution never explained why, on the day he purchased the car, Mr. Gibson needed to borrow $100 from witness Sean Hess to purchase a car for $395, NT 3/8/95, 213-24; *id*. at 218, when the prosecution claimed that, on the day before, Petitioner robbed the victim of a gun and $1400. *Id.* at 63, 70-71.

At trial, the prosecution presented informants who claimed that Mr. Gibson made incriminating statements or jailhouse confessions, two witnesses who testified that Mr. Gibson had a gun, a witness who testified that a person matching Mr. Gibson's height and weight shot the victim, and a witness who claimed he saw Mr. Gibson leaving the store after shots were fired. There was evidence that Petitioner was framed. Two witnesses, Eddie Gilbert and Cyril Thomas, testified at trial that Petitioner gave the victim's gun to Gilbert who, in turn, provided it to Thomas. When originally telling investigators their stories about the chain of custody of the victim's gun, they only mentioned Petitioner, not each other, as part of the gun's chain of custody. NT 3/9/95, 296, 308.

In addition to the foregoing, the prosecution relied on witnesses who asserted that Mr. Gibson was in Bristol Borough on the day of the homicide.

Mr. Gibson testified in his own defense that, although he was in Bristol Borough on the morning of the crime, he was in other neighborhoods at the time of the homicide, NT 3/10/95, 515-18, and he presented a witness supporting his alibi. *Id*. at 495-98.

Defense counsel argued that the case against Mr. Gibson was unreliable and built upon untrustworthy evidence and police coercion. NT 4/27/01, 230-31. He argued that the prosecution's case was "a giant get out of jail free card" for Commonwealth witnesses. NT 3/13/95, 19. In response, the prosecutor vouched for all of the informant witnesses: "Did one of them, one of the nine break down on the stand and say, well, you're right, I was lying? No." *Id*. at 29.

The jury found Mr. Gibson guilty of all charges and after a capital penalty phase it rendered a verdict of death. The judgment was affirmed on appeal.

B. State Post-Conviction and Habeas Proceedings.

In his first state post-conviction (PCRA) proceedings, Mr. Gibson raised a number of *Brady* claims. During a PCRA hearing in April 2001, the trial prosecutor denied that the prosecution possessed discovery that had not been disclosed, saying, "I believe everything has been turned over in the case, which certainly by way of witness – eyewitness statements and so forth and reports." NT 4/27/01, 6.

Ten years later, during federal habeas litigation, the District Court ordered the Commonwealth to produce discovery. Only then did the Commonwealth produce previously undisclosed *Brady* evidence from the prosecutor's own trial file. Upon receipt of this additional discovery, the habeas proceedings were stayed while Mr. Gibson pursued a second PCRA petition that raised additional *Brady* claims. The PCRA court determined it had no jurisdiction, and the state appellate court affirmed. *Commonwealth v. Gibson*, No. 584 EDA 2014 (Pa. Super. Jan. 16, 2015) (unpublished), App. F.

Upon the reactivation of habeas proceedings, the District Court denied habeas relief, conducting a *de novo* review of the *Brady* claims. The District Court acknowledged, "[w]e do not take lightly Gibson's argument that the jury may have seen the evidence presented at trial differently had the prosecution not suppressed evidence." *Gibson v. Beard*, 165 F. Supp.3d 286, 313 (E.D. Pa. 2016), App. H. Yet, the District Court determined that the prosecution had suppressed numerous items of evidence, but that those violations were not material. *Id*. at 303-04. The District Court denied Petitioner a COA.

The Court of Appeals, however, granted a COA on 14 enumerated *Brady* claims, an ineffective assistance of counsel claim and a cumulative error claim. *Gibson*, No. 16-1729, App. I.

Following argument, the Court of Appeals affirmed the denial of relief, applying *de novo* review. The Commonwealth did not argue for review under AEDPA. *Gibson*, slip op. at 5 n.3, App. J. It did not disturb the District Court's conclusion that the Commonwealth suppressed *Brady* material that could have been used to impeach five witnesses: Edward Jones, Glenn Pollard, Sean Hess, Herman Carroll, and Paulinda Moore. *Id*. at 6-7. Even though the Commonwealth had suppressed evidence impeaching a majority of the informant witnesses, the Court of Appeals concluded that Mr. Gibson was not prejudiced because untainted evidence established Mr. Gibson's guilt. *Id*. at 13-14. However, that court failed to analyze the evidence in accordance with the instruction in *Kyles* that petitioners can use *Brady* evidence to "attack[] the reliability of the investigation." *Kyles*, 514 U.S. at 446; *Id.* at 453.[2]

[2] The Court of Appeals also addressed undisclosed evidence relating to Commonwealth witnesses Eddie Gilbert, Kevin Jones, and Cyril Thomas, but found no *Brady* violations. *Gibson*, slip op. at 7-11, App. J. However, the court did not analyze these violations through the lens that they discredited the overall investigation conducted by the Commonwealth. Also, the court did not analyze undisclosed evidence regarding Bernard McLean, because no COA was granted on that claim. Petitioner discusses the availability of COA for McLean below. *See* n.2, *infra*.

REASONS FOR GRANTING THE WRIT

I. This Court should grant certiorari to decide whether, when a court finds that the prosecution suppressed evidence of inducements provided to its witnesses, materiality analysis must consider how the defense could have used the evidence to raise doubts about the reliability and credibility of the State's investigation.

At Petitioner's trial, in addition to impeaching a number of witnesses, the *Brady* evidence would have shed light on a wide array of police tactics: threats, physical violence, monetary payments, letting witnesses avoid criminal charges, and promising to help with sentencing. The suppressed evidence would have shown the coercion and inducements used to gain Petitioner's conviction. As this Court stated in *Kyles*, Petitioner could have used the multiple pieces of suppressed evidence to attack the reliability of the prosecution's case.

A. The suppressed evidence of inducement, coercion and intimidation.

If the Commonwealth had revealed that it was using a highly paid informant, the jury would have looked skeptically at the case it presented. The Court of Appeals agreed that the Commonwealth suppressed evidence that Edward Jones, who testified that Mr. Gibson confessed to the murder, was a handsomely paid informant who received an apartment, car repairs from the police and over $9,800 in payments from the DEA, including a $1,500 payment the day after providing a statement inculpating Mr. Gibson. Jones also gave a false name to the police (for which he could have been charged, but was not).

The jury also did not know about the letter showing that a Bucks County detective had told jailhouse informant and prosecution witness Glenn Pollard to keep his mouth "completely shut" about their conversations about moving Pollard to less restrictive incarceration. The jury did not know that Pollard was an individual who, police recognized, would testify to "whatever

might be necessary" to help the prosecution. NT 5/29/01, 89-90; PCRA2 Exh. D-11.[3] If this evidence had not been suppressed, it would have impacted the jury's assessment of the prosecution witnesses who denied asking for, or receiving, favors. NT 3/9/95, 400 (Pollard); *id*. at 378 (Carroll); *id*. at 282-83 (Kevin Jones). It very likely would have affected the jury's impressions of the case to know that the Commonwealth was using a witness who frequently testified to fill in holes in the Commonwealth's cases. *See Banks v. Dretke*, 540 U.S. 668, 701 (2004) ("This Court has long recognized 'the serious questions of credibility' informants pose.") (*quoting Lee v. United States*, 343 U.S. 747, 757 (1952)).

The jury did not know that the trial prosecutor told witnesses that if they cooperated, their sentencing judge would be informed about their cooperation. PCRA2 Exh. D-18 (report of interaction with twin brother of Commonwealth witness Kevin Jones). Nor did it know that a detective told a witness to arrange a plea agreement with the trial prosecutor in exchange for testifying. PCRA2 Exh. D-21 (report of interaction with Carroll).

The jury did not know that, among their investigate techniques, detectives used the threat of criminal charges and physical violence to the home of a witness's mother. NT 4/27/01, 130-32; PCRA1 Exh. 23 (Hess); PCRA1 Exh. 57 (Thomas's juvenile probation file, intake summary and running dictation at 5).

It also did not know that the Commonwealth induced witnesses to testify by not charging them with crimes such as giving false names to police officers. PCRA2 Exh. D-5 (Ed Jones/Ed

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[3] References to the first state post-conviction hearing exhibits are denoted as PCRA1 Exh. ___. This hearing was held on April 27, 2001 and May 29, 2001. References to the second state post-conviction hearing exhibits, which hearing was held on November 19, 2012 and January 4, 2013, are denoted as PCRA2 Exh. ___.

Hicks); PCRA2 Exh. D-22 (Bernard McLean/Bernard Johnson). This is evidence of bias, as an individual who gives a false name to a police officer can be successfully prosecuted for making false reports. *Commonwealth v. Long*, 10 Pa. D. & C. 4th 252 (1991).[4]

With respect to another witness, *Brady* material led to evidence showing she had auditory hallucinations shortly before she allegedly had a conversation with Petitioner about the crime. PCRA1 Exh. D-50 (Paulinda Moore). The day after she gave a statement in this case she was ordered to submit to a mental health evaluation. PCRA1 Exh. D-23.

Trial counsel could have used the evidence of inducement, threat and coercion to reinforce the defense that the Commonwealth's case was unreliable because it was built on inducement and coercion. He could have used the suppressed evidence to reinforce trial evidence that the Commonwealth witnesses were framing Petitioner, witnesses who fingered Petitioner as the one possessing the victim's gun and not mentioning each other possessing it.

[4] The Court of Appeals did not consider the report that Bernard McLean gave a false name to the police the same day as the homicide in this case – evidence not included in the COA grant. *Gibson*, No. 16-1729, slip op. at 5 n.2, App. J. However, the Court of Appeals granted COA for a report that Commonwealth witness Ed Jones had given a false name to the police. Consistency would lead it to grant COA for the same claim against McLean.

B. The Court of Appeals' analysis improperly cabined the *Brady* evidence.

In its Opinion, the court did not address the effect of the multiple suppressions on the integrity of the prosecution. Its analysis mirrored a sufficiency analysis that *Kyles* rejects. *Kyles*, 514 U.S. at 434, 453. *Kyles* instructs, "[T]he question is not whether the State would have had a case to go to the jury if it had disclosed the favorable evidence, but whether we can be confident that the jury's verdict would have been the same." *Id*. at 453.

Furthermore, as stated, the Court of Appeals' Opinion does not take into account *Kyles*' instruction that *Brady* evidence is material if it attacks the reliability of the government's investigation of the case against the defendant. *Kyles*, 514 U.S. at 446. Here, the post-trial disclosures show a full arsenal of investigative weapons of which the jury was not aware and which likely would have led the jury to discredit the case against Petitioner: exorbitant payments to a witness; telling a witness to keep his mouth completely shut about conversations with a detective; witnesses denying asking for or receiving benefits when the suppressed evidence said they did; the trial prosecutor sanctioning inducements that favorable testimony would lead to a favorable sentence for the witness; physical violence to the home of a witnesses' mother and threatening criminal charges unless a favorable statement was given. It is probable that these disclosures would have undermined the jury's perception of the Commonwealth's investigation. They undermine confidence in the outcome of the case. *See Kyles*, 514 U.S. at 434.

The Court of Appeals agreed that *Brady* evidence concerning Paulinda Moore (schizophrenia) and Glenn Pollard (requesting movement to less secure facility and saying he would not talk with anyone about his conversations with the detective) was "highly probative." *Gibson*, slip op. at 11, App. J. However, it improperly discounted that evidence because it claimed that the witnesses were already "thoroughly impeached." *Id*. On this point, the court's

decision is not supportable. With respect to Moore, the *Brady* evidence showed that she had auditory hallucinations shortly before the alleged conversation with Petitioner. PCRA1 Exh. D-50. The court said she was already impeached because she had open charges and admitted to drug use. *Gibson*, No. 16-1729, slip op. at 12, App. J. However, the court's analysis does not account for her answers on redirect where she testified that she had been testifying truthfully to what she had heard. NT 3/9/95, 266. Evidence of recent auditory hallucinations would have impeached this testimony in a way not impeached on the trial record.

The court said that Pollard was already discredited by David Margerum. *Gibson*, No. 16-1729, slip op. at 11-12, App. J. But Margerum was another inmate. By contrast, Pollard's withheld letters – written to a county detective and the prosecutor – were much more damaging. They provide a reason Pollard would not admit asking for a favor to testify. The detective had told him to keep his mouth "completely shut" about their conversations. PCRA2 Exh. D-11.

The withheld letters discredited the prosecutor's argument that none of the informants admitted lying. NT 3/13/95, 27. Counsel could have argued that the informants, like Pollard, would not admit to asking for or receiving deals because they were following police instructions not to reveal their conversations. The coercion against Hess and the threat of coercion against Thomas would have supported counsel's argument that Pamela Harrison, on whose testimony the court relies, *Gibson*, No. 16-1729, slip op. at 13, App. J, was coerced into giving testimony favorable to the Commonwealth. NT 3/13/95, 16; *see also* NT 3/10/95, 542 (Harrison told Petitioner she was threatened and "scared to death" by the police). The coercion defense is supported by the testimony of Harrison's mother, Lola Gibson. Lola Gibson testified she was "very much upset" when the police told her Petitioner made a statement that he had given her some money. NT 3/10/95, 492.

C. Even accepting the Court of Appeal's decision that certain evidence was not *Brady* evidence, materiality is established.

The prosecution needed the informant witnesses as it tried to patch the holes in its case. Not a single eyewitness identified Mr. Gibson as the shooter. Mr. Segal, the only witness to see the incident, gave different descriptions of the assailant's size which became closer to that of Mr. Gibson at trial. The other witness, Alfonso Colon, was confused, and said he heard the shooting at 2 p.m., when other evidence placed it at around 3 p.m. Under these circumstances, the trial court instructed the jury it could view Segal's and Colon's testimony with skepticism. NT 3/13/95, 62.[5]

The Commonwealth said the motive for the robbery was buying a car. It opened the case urging that the victim "paid for with his life for that particular vehicle." NT 3/7/95, 13. While the prosecutor's case alleged that Petitioner got $1400 from the robbery, it also put on evidence that the day *after* the homicide and robbery Petitioner begged for and got the last $100 to buy a $400 car from Sean Hess. This discrepancy is a weakness in the Commonwealth's case that the Court of Appeals did not address.

To show that the *Brady* violations undermined confidence in the outcome of this case, Petitioner need not show *Brady* violations for all witnesses or even all important Commonwealth witnesses. In *Kyles*, the *Brady* violations went to only two of four eyewitnesses. Nonetheless, this Court ordered a new trial. It reached that decision even though "the jury might have found

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[5] The Court of Appeals relies on Segal's testimony that the assailant "matched Gibson's size, build and complexion." *Gibson*, slip op. at 13, App. J. However, at trial, counsel failed to impeach Segal with the fact that he did not identify Petitioner during an in-person line-up. At that line-up, Segal saw Petitioner's size, build and complexion, but did not identify him.

the [untainted] eyewitness testimony of [two eyewitnesses] sufficient to convict." *Kyles*, 514 U.S. at 453.

Important to this case, the prosecutor withheld documents in his own file. In 2001, he falsely promised court and counsel in state post-conviction that "everything has been turned over in this case." NT 4/27/01, 6. However, a federal district court discovery order revealed the letter from Pollard showing that a county detective was telling an informant not to talk to anyone about their conversations. Another suppressed report showed the trial prosecutor himself was offering deals, promising to reward helpful testimony with help at an informant's sentencing. PCRA2 Exh. D-18. This evidence would have supported the defense theory of the case. The non-disclosure kept the jury in the dark. *See Banks*, 540 U.S. at 696 ("A rule thus declaring 'prosecutor may hide, defendant must seek,' is not tenable in a system constitutionally bound to accord defendants due process.").

The District Court acknowledged, "We do not take lightly Gibson's argument that the jury may have seen the evidence presented at trial differently had the prosecution not suppressed evidence." *Gibson*, 165 F. Supp.3d at 313, App. H. The Court of Appeals, however, did not address the Petitioner's contention that trial counsel could have used these disclosures to cast doubt on the entire prosecution case.

Proper disclosure would have supported counsel's argument that Pamela Harrison's testimony was coerced. To support his argument, counsel could have used the damage to Sean Hess's house, the intimidation of Hess's mother, and the plan to threaten Cyril Thomas with criminal charges. The suppressed evidence would have given him an argument that none of the informants could be trusted because of the detective's instructions to Pollard to keep his mouth completely shut about their conversations. Similarly, the *Brady* material would have supported

the defense that the case was a giant get-out-of-jail-free card for the informants – and they were not being truthful about that. The disclosures showed that the trial prosecutor was offering to help informants at their sentencings. His detectives knew that and, on more than one occasion, referred witnesses to him for offers. The Commonwealth was buying testimony in more ways than one.

The identifications were shaky. The alleged motive for the robbery/homicide – to buy a car – did not pass muster considering the Commonwealth's own case that Petitioner begged for money to buy the car the day after the crime. The Commonwealth's case was further weakened because trial record showed how Commonwealth witnesses were framing Petitioner, i.e., changing their stories about who had the victim's gun.

The Commonwealth was left with witnesses who said Petitioner was in Bristol Borough on the day of, somewhere around the time of, the homicide – testimony Petitioner and another witness contradicted. Even if those witnesses were correct, mere presence does not begin to be enough to convict.

The jury's ignorance about all the methods of obtaining favorable testimony – inducements, payments, threats and intimidation used in this case – undermines confidence in the outcome of the trial.

CONCLUSION

By virtue of all of the *Brady* violations and the likely impact on the entire prosecution case if they had been disclosed, which the Third Circuit did not consider, Jerome Gibson respectfully requests that the Court grant this Petition for a Writ of Certiorari.

Respectfully submitted,

/s/ Samuel J.B. Angell
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PETITION FOR WRIT OF CERTIORARI TO THE THIRD CIRCUIT COURT OF APPEALS

PROOF OF SERVICE

I, SAMUEL J.B. ANGELL, certify that on this date, I caused a copy of the foregoing *Motion for Leave to File In Forma Pauperis* and *Petition for Writ of Certiorari* and *Appendix* to be served by FIRST CLASS MAIL upon the following person:

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/s/ Samuel J.B. Angell
Samuel J.B. Angell

Dated: July 12, 2018