CASE No.

IN THE SUPREME COURT OF THE UNITED STATES

STEPHEN MAYER,
Petitioner,

v.

UNITED STATES OF AMERICA,
Respondent.

On Petition For Writ of Certiorari to the

United States Court of Appeals for the Eleventh Circuit

PETITION FOR WRIT OF CERTIORARI

11th Circuit Appeal Court Case No. 17-13270

Stephen Mayer
Incarcerated Pro Se Petitioner
Inmate I.D. 02303-104
Federal Correctional Institution
P.O. Box 779800
Miami, FL. 33177.

Dated: July 29, 2018.

QUESTIONS PRESENTED

I.

Whether when an Appellate court vacates a forfeiture order on direct appeal having found only partial of the District Court's trial order was valid if the finding of fact prior to vacating the order becomes "Law-Of-The-Case" upon remand. Mayer was permitted to and indeed did argue against the entire forfeiture amount at the hearing on remand. Put another way does the act of vacating an order of forfeiture on direct appeal effectively wipe the slate clean?

II.

Whether if prosecutorial fraud in the material representation of false facts is sufficient to overturn the "Law-Of-The-Case" Doctrine if indeed such Doctrine survives vacating a forfeiture order on direct appeal?

And therefore,

III.

Whether it is encumbent upon the Government to clarify an issue to the Court when the Court mistakenly relies on a prior fraudulent misrepresentation of the Government's to deny a defendant subsequent relief?

LIST OF PARTIES

The parties to the original proceeding in the District court were petitioner Stephen Mayer and the United States of America, Respondent.

TABLE OF AUTHORITIES

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(Filed separately)

OPINION BELOW

The United States Court of Appeals for the Eleventh Circuit affirmed Stephen Mayer's forfeiture order in United States v. Mayer, No. 17-13270 (11th Cir. 2017) and denied Mayer's combined petition for panel rehearing and rehearing en banc on May 16, 2018. A copy of the decision is filed here with as Appendix A, and a copy of the denial of the petition for rehearing is filed here with as Appendix B.

GROUND FOR JURISDICTION

The Eleventh Circuit affirmed Mayer's forfeiture on March 19, 2018 see Appendix A, and denied rehearing on May 16, 2018, see Appendix B. The jurisdiction of this Court is invoked by the timely filing of this petition for a writ of certiorari within the prescribed 90 days after entry of the Eleventh Circuit's denial of Mayer's petition for rehearing. See 28 U.S.C. § 1254(1) and Supreme Court Rule 13.3.

CONSTITUTIONAL PROVISIONS INVOLVED

U.S. Constitutional Amendment 5
Criminal actions-Provisions concerning-Due process of law and just compensation clauses.
No person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand Jury, except in cases arising in the land or naval forces, or in the Militia, when in actual service in time of War or public danger; nor shall any person be subject for the same offence to be twice put in jeopardy of life or limb; nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or property, without due process of law; nor shall private property be taken for public use, without just compensation.

U.S. Constitutional Amendment 14 Section 1
All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property , without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

STATEMENT OF THE CASE

In September 2014, Stephen Mayer was charged by superseding indictment with conspiracy to commit wire fraud affecting a financial institution, and eight counts of wire fraud affecting a financial institution, in violation of 18 U.S.C. §§ 1349 and 1343 District Court Dkt. 30. The indictment alleged that Mayer and coconspirators had deceived lenders to secure mortgage loans.

Following an eight day jury trial Mayer was found guilty of all nine counts and sentenced to a 135 month prison term on May 5, 2015. Mayer appealed and on February 14, 2017 the 11th Circuit Court of Appeals affirmed in part, vacated and remanded in part.

I. Material Facts

Mayer's forfeiture order was vacated and remanded on direct appeal with findings that only certain mortgages were from an FDIC insured entity, District Court DKT 171. Specifically the Appeals Court stated, "only $1,116,200 of these mortgages came from Green Point an FDIC insured entity." which reduced the sum of forfeiture. The Appellate vacated the forfeiture order and remanded for further proceedings to the District Court. On July 6, 2017 the District Court held a hearing where Mayer claimed the forfeiture must be zero because the lender Green Point Mortgage was not as the Appellate stated FDIC insured. At the July 6th hearing Mayer pointed to the false trial representation of the lender as FDIC insured through testimony and trial exhibits to which AUSA Kelly Howard Allen stated she didn't believe anyone

had claimed the lender was FDIC insured and while she knew it wasn't evidence the indictment, District Court Dkt. 30 at 1-2 was clear that Green Point Mortgage affected its parent entity which was FDIC insured District Court Dkt. 193 at 13. Five minutes later at the same hearing AUSA Howard-Allen proceeded to falsely claim the same lender was FDIC insured.

Doc. 193 at 22

By AUSA Kelly Howard-Allen

"So I don't need to run through all of these, but again, these are the same entities. This property, Exhibit 18-J, was for 3510 North 11 Street. It also shows that this was a first and second mortgage from Green Point Mortgage to Fobare, an FDIC insured lender.

And again, at the end of this, this was a forclosure by an FDIC insured lender six months after closing, and that lender was Green Point, a wholly owned subsidiary of Green Point Bank and North Fork Bank."

At the hearing Mayer's attorney William Sansone explained a) there was no trial evidence of affect on a parent FDIC entity, b) the lender at the center of this case was not FDIC insured, and c) the lender was not recognized as a financial institution when the mortgage loans subject to this case were issued.

Doc. 193 at 9.

MR. SANSONE: Your Honor, our position is, if you look at the 11th Circuit opinion where it says, "Greenpoint, an FDIC insured entity," first of all, the opinion doesn't delineate whether that's Greenpoint Mortgage Funding or Greenpoint Bank. Greenpoint Mortgage Funding, which is the entity that secured these mortgages, is not an FDIC insured entity. I don't -- it doesn't outline that in the indictment itself. It says that Greenpoint Mortgage Funding was a wholly owned subsidiary of an entity, which is FDIC insured. Therefore, the Government would

have to put on evidence that whatever happened with those mortgages, affected the actual parent corporation --

THE COURT: The bank.

MR. SANSONE: -- which is the FDIC insured entity.

And our position is merely because of the parent subsidiary relationship, just in and of itself, without more, does not create that, um -- doesn't create that necessary link to "affecting."

Doc 193 at 11-12
By William Sansone

"Just merely relying on, um, the parent corporation is FDIC insured so if the subsidiary does something, and creates a mortgage, and then that mortgage goes into foreclosure, of course it "affects." That would be an assumption. We don't know. We would need testimony and evidence from the parent corporation saying that those loans that were secured by Green Point Mortgage Funding, when they went into foreclosure, affected our institution and here's how.

I do not believe that that evidence was submitted at trial. There was lots of testimony that I saw saying that Green Point Mortgage was FDIC insured, and an exhibit, I believe it was 18-M, showing on the bottom that Green Point was an FDIC insured lender, but one, I'm not sure what Green Point is referring to; and two, if it was referring to Green Point Mortgage Funding, which is the entity that secured these mortgages, it's not FDIC insured."

THE COURT: Okay. I understand.

MR. SANSONE: So, therefore, we could not agree to any amount of forfeiture.

THE COURT: Okay. All right. Thank you.

Mayer went further and explained to the Court the material falsehoods of trial testimony that the lender was a financial institution and as FDIC insured.

Doc. 193 at 9, Doc. 193 at 11-12 and Doc. 193 at 29.

By William Sansone

Your Honor, this was a problem at the time. That's the reason why Congress, in 2009, specifically amended 18 U.S.C., section 20 to include mortgage lending businesses such as GreenPoint Mortgage Funding, because before that time they were not. They were not part of it. This was the problem. This was going on, I think -- in the indictment it said these came out in 2006. This was before the crash. This was a problem that was going on. Congress changed the statute in 2009 to include mortgage lending businesses so these types of issues weren't --wouldn't arise.

But in this case, they did arise. Green Point Mortgage -- the 11th Circuit is just not clear at all when it says, "The mortgages came from Greenpoint." Because there's a Greenpoint Bank, which is FDIC insured, and there is GreenPoint Mortgage, which is not. They are not clear in that opinion. If they are referring to Greenpoint Mortgage Funding, that's erroneous. If they are referring to Greenpoint Bank, that's also erroneous because the mortgages came from Greenpoint Mortgage Funding. So I was unable to determine how the 11th Circuit came up with that.

And there were lots of, it looks like, slippage of language throughout the trial saying Greenpoint Mortgage Funding was FDIC insured and it wasn't, and maybe this issue wasn't litigated because it didn't really reach a head until you had to start unpacking exactly how these foreclosures affected the financial institution."

The District Court's order, District Court Dkt. 181 ignored the issues of the false misleading presentation of facts at the hearing and at trial and found in favor of the Appellate's findings. Mayer's motion District Court Dkt. 182 to reconsider detailed the core issue of prosecutorial misconduct, and perjury where prosecutors knowingly misrepresented the FDIC insured status of a mortgage lender. Clearly there was no basis for

forfeiture if the lender was not FDIC insured, Mayer appealed.

Mayer filed his timely appeal brief on October 20, 2017. The government responded by filing a motion for an extension of time to respond which was granted. Subsequently the Government filed a second motion claiming the Appellate lacked jurisdiction for the appeal and sought summary affirmance. Mayer responded by filing a motion in support of his brief. Mayer questioned the validity of the Government claims that i) the Court didn't have jurisdiction and ii) that summary affirmance was warranted when Mayer had argued the forfeiture amount at the District Court the decision of which he was 'now' appealing. Mayer's brief addressed the forfeiture hearing and how the Government defended its position at that hearing. Mayer claimed the Government opened the door to numerous trial issues when the Government referenced testimony and exhibits repeating material falsehoods. Mayer's appeal brief not only addressed forfeiture but pointed to his overall conviction by referencing AUSA Riedel's trial closing argument explaining all nine of Mayer's charged counts District Court Dkt. 149 at 48-51, "that's why it matters that Green Point is FDIC insured because it is a financial institution."

Mayer is an untrained pro se defendant whose appeal brief was admittedly broad in its presentation of the facts but none the less Mayer addressed the core issue of forfeiture. The Appellate responded by finding Mayer should have raised the issues earlier in the proceedings and that the lender was FDIC insured based upon the law of the case doctrine, affirming the Government's motion for summary judgement.

Mayer responded by filing for an en-banc hearing asserting 1) the law of the case doctrine can be overcome when clearly the decision is based on erroneous information and 2) that the act of vacating the forfeiture order in Mayer's direct appeal effectively wiped the slate clean for forfeiture. Specifically Mayer challenged the law of the case for the forfeiture as a "slate wiped clean" and Mayer's July 6, 2017 hearing made clear Mayer's argument in relation to the erroneous statement by the Appellate that Green Point was FDIC insured.

The Appellate construed Mayer's petition for En Banc rehearing as a motion for reconsideration. In its subsequent order of denial the Appellate claimed the Court had only partially vacated Mayer's forfeiture order stating:

"we vacated only the portions of his original forfeiture judgement that did not constitute proceeds affecting an FDIC-insured parent entity. We specifically determined that $1,114,200 came from mortgages from Green Point, which was FDIC-insured, and therefore, were proceeds to be included in his forfeiture judgement."

Mayer's direct appeal states, District Court Dkt. 171 at 18 "we vacate the forfeiture order and remand for further proceedings."

The Government did not assert law of the case doctrine or the mandate rule at Mayer's forfeiture hearing on remand and Mayer appropriately objected to any forfeiture order.

II. Basis for jurisdiction in the Courts below

In this criminal case, the District Court had jurisdiction to enter its July 7, 2017 forfeiture judgement against Mayer pursuant to 18 U.S.C. § 3231. Mayer filed his timely notice of appeal in the Eleventh Circuit on July 18, 2017. That Court had jurisdiction over his appeal pursuant to 28 U.S.C. § 1291.

REASONS FOR GRANTING THE WRIT

The Act of Vacating an Order

I. An ambiguous order finding certain facts but which culminates in the vacating of a District court's order on direct appeal effectively wipes the slate clean on remand and there is therefore no law of the case to overcome.

Mayer claims the mandate rule does not apply because the Appellate elected to vacate the forfeiture order. "The mandate rule is a specific application of 'law of the case doctrine which provides that subsequent courts are bound by any findings of fact or conclusions of law made by the court of appeals in a prior appeal of the same case." The Appellate granted the Government's motion for affirmance which Mayer challenges as erroneous. The Eleventh Circuit Court of Appeal relies upon two cases to explain the law-of-the-case doctrine and the Mandate rule: "Where an appellant failed to raise an issue during his first direct appeal, and does so for the first time on appeal after remand, he has waived that issue. United States v. Fiallo-Jacome, 874 F. 2d 1479, 1481-83 (11th Cir. 1989)." and "United States v. Amedeo, 487 F. 3d 823, 830 (11th Cir. 2007)(quotation marks and citation omitted). We recognize the same three exceptions to the mandate rule as we do for the law-of-the-case doctrine. See Id." In United States v. Krocka, 522 Fed. Appx. 472; 2013 (11th Cir. 2013) the Eleventh Circuit Court of Appeals explains: "United States v. Fiallo-Jacome, 874 F. 2d 1479, 1481-83 (11th Cir. 1989). The District Court and this Court are bound by the

findings of fact and conclusions of law made in a prior appeal of the same case unless: "(1) a subsequent trial produces substantially different evidence, (2) controlling authority has since made a contrary decision of law applicable to that issue, or (3) the prior decision was clearly erroneous and would work manifest injustice." United States v. Stinson, 97 F. 3d 466, 469 (11th Cir. 1996)."

1) Mayer claims the act of vacating Mayer's forfeiture order effectively wiped the slate clean.

2) Mayer sufficiently argued the issue on remand before the District Court and highlighted the material false misrepresentation of evidence by the Government and therefore,

3) The prior findings of the Appellate were shown to be clearly erroneous.

The Appellate Court asserted Mayer is governed by its prior findings of facts. However, Mayer provided new evidence at his remand hearing which contradicted the Appellate's findings. Circuit precedent clearly recognizes multiple cases where the showing of error in prior decisions is reason enough to overturn the law of the case doctrine. Aside from these precedents the fact that the District Court heard new evidence directly contradicting the Appellate's findings should have been sufficient to upend the Government's motion for summary affirmance.

In Damahy v. Schwarz Pharma, Inc. 702 F. 3d 177, 184 (5th Cir. 2012). See also Oladeinde v. City of Birmingham, 230 F. 3d 1275, 1288 (11th Cir. 2000): there are only two [663 Fed. Appx. 770] ways a party can overcome the law of the case doctrine: (1)

"if, since the prior decision, new and substantially different evidence is produced, or there has been a change in the controlling authority" or (2) "the prior decision was clearly erroneous and would result in a manifest injustice. Oladeinde v. City of Birmingham, 230 F. 3d 1275, 1288 (11th Cir. 2000). See also This That and the Other Gift and Tobacco, Inc. v. Cobb Cnty., 439 F. 3d 1275, 1283 (11th Cir. 2006).

Mayer's petition for en-banc review was considered a motion to reconsider which the Court determined raised new arguments to defeat the law of the case.

The Appellate's denial of Mayer's motion for a re-hearing relied on Wilcombe v. Tee Vee toons, Inc., f. 3d 949, 957 (11th Cir. 2009). However Wilcombe specifically addressed issues that could have been raised prior to entry of judgment. The Appellate Court effectively stated Mayer was raising a new argument on appeal when in fact Mayer raised each of his issues at the District Court and in his appeal brief.

This Court has previouly ruled in Pepper v. United States, 131 S. Ct. 1229, 179 L. Ed. 2d 196 (2011) the act of vacating a sentence effectively wiped the slate clean. Mayer's motion for reconsideration argued the act of vacating a forfeiture order must effectively wipe the prior findings of forfeiture out.

In Pepper this Court addressed the law of the case as follows: "The doctrine does not apply if the Court is 'convinced that [its prior decision] is clearly erroneous and would work a manifest injustice.'" And Agostini v. Felton, 521 U.S. 203, 236 117 S. Ct. 1997, 138 L. Ed 2d 391 (1997)(quoting Arizona, 460

U.S. at 618, n, 8, 103 S. Ct. 1382, 75 L. Ed. 2d, 318; alteration in original). In Messenger v. Anderson, 225 U.S. 436, 444 32 S. Ct. 739, 56 L. Ed. 1152 (1912) This Court explained: The doctrine "expresses the practice of courts generally to refuse to reopen what has been decided" but it does not "limit[courts'] power". Thus, doctrine may describe an appellate court's decision not to depart from a ruling that it made in a prior appeal in the same case. See C. Wright et al., 18B Federal Practice and Procedure § 4478, p. 646, and n. 16 (2d ed. 2002)(collecting cases). But the doctrine is "something of a misnomer" when used to describe how an appellate court assesses a lower court's rulings. United States v. Wells, 519 U.S. 482, 487, n.4, 117 S. Ct. 921, 137 L. Ed. 2d 107 (1997). "An appellate court's function is to revisit matters decided in trial court. When an appellate Court reviews a matter on which a party failed to object below, its review may well be constrained by other doctrines such as waiver, forfeiture, and estoppel, as well as by the type of challenge that it is evaluating. But it is not bound by district court rulings under the law of the case doctrine." See also Michael Musacchio v. United States, 136 S. Ct. 709; 193 L. Ed. 2d. 639 (2016). Mayer objected to any forfeiture at the hearing on remand and Mayer asserted he must be allowed to appeal that hearing. Therefore, this Court should grant this petition to consider the issue of when the law of the case attaches or if indeed such an argument is applicable on the face of it.

Overcoming The-Law-Of-The-Case

II.

Prosecutorial fraud in material false misrepresentations must be a benchmark for overcoming the law of the case doctrine, when such fraud is material to the issue subject to the law of the case and

III. Prosecutors cannot knowingly rely on false testimony and receive known fraudulent trial exhibits into evidence which are material to a Court order and stand idly by as the Courts utilized the same set of false facts in determining the law of the case.

The presentation of known false evidence specifically designed to vex and mislead a Court must meet the bar for manifest injustice when such evidence is used to deprive a defendant of not only his freedom but his property through forfeiture. The District Court was presented with information that should shock the consciousness of any jurist.

This case represents a frightening set of circumstances, where a prosecutor knowingly solicited false evidence and testimony not just to achieve a guilty verdict but to assert jurisdiction. Building further on lies to seek forfeiture of the defendant's property. The District Court and Appellate have practiced wilful blindness to ignore a case where a known blatant fraud utilized to convict a defendant has bubbled to the surface through forfeiture proceedings. While the majority of cases Mayer has found deal with the underlying conviction, the same must be said for other trial issues such as forfeiture. The fact that Mayer's actual conviction is called into question via these proceedings is no doubt the unwelcome elephant standing in the

middle of these entire proceedings.

A prosecutor has a constitutional duty to correct the false impression of fact. United States v. LaPage, 231 F. 3d 488, 492 (9th Cir. 2000). "It is of no consequence that the falsehood bears upon the witness' credibility rather than directly upon the defendant's guilty" because "[t]he jury's estimate of truthfulness and reliability of a given witness may well be determinative of guilt or innocence, and it is upon such subtle factors as the possible interest of the witness that a defendant's life or liberty may depend." Hayes, 399 F. 3d at 986 (citing Napue, 360 U.S. at 269). Holland v. Adams, 2007 WL 7770910 at *16 (C.D. Cal. Apr. 3, 2007)(emphasis added). This aligns with Eleventh Circuit precedent:

"If false testimony surfaces during at trial and the government has knowledge of it, ... the government has a duty to step forward and disclose." Brown v. Wainwright, 785 F. 2d 1457, 1464 (11th Cir. 1986). "In order to prevail on a Giglio claim, a petitioner must establish that the prosecutor knowingly used perjured testimony, or failed to correct what he subsequently learned was false testimony, and that the falsehood was material." Tompkins v. Moore, 193 F. 3d 1327, 1339 (11th Cir. 1999). Ventura, 419 F. 3d at 1288 (emphasis added).

A Conviction obtained by the knowing use of false evidence or perjured testimony is fundamentally unfair and violates a defendant's constitutional rights. United States v. Agurs, 427 U.S. 97, 103, 96 S. Ct. 2392, 49 L. Ed. 2d 342 (1976); see also Napue v. Illinois, 360 U.S. 264, 269-70, 79 S. Ct. 1173, 3 L. Ed.

2d 1217 (1959)("A lie is a lie, no matter what its subject, and, if it is in any way relevant to the case, the district attorney has the responsibility and duty to correct what he knows to be false and elicit the truth." (internal quotation marks omitted)). To merit habeas relief, a petitioner must show that the testimony was actually false, that the prosecutor knew or should have known that it was false, and that the falsehood was material to the case. Jackson v. Brown, 513 F. 3d 1057, 1071-72 (9th Cir. 2008). A Napue violation is material if there is any reasonable likelihood that the false testimony could have affected the jury's decision. Libberton v. Ryan, 583 F. 3d 1147, 1164 (9th Cir. 2009).

The Appellate made no attempt to address what was clearly a house built on quick sand and instead shores up the foundation of prosecutorial fraud by claiming the actual fraud perpetrated by prosecutors is the law of the case.

The Government's references to Green Point Bank were merely a vexatious presentation of facts, while it is true Green Point Mortgage was once a subsidiary of Green Point Bank it was irrelevant to these proceedings. Mortgages referenced in this indictment were issued in 2006, Green Point Bank had ceased trading in 2004 and its FDIC insured status expired in February 2005. In short from February 2005 there was no Green Point anything that was FDIC insured. However, at trial the Government simply referenced the lender as FDIC insured and declared it to be a financial institution.

The Ninth Circuit has held that a conviction based on

false testimony, even without any evidence of prosecutorial misconduct in presenting the testimony, may result in a violation of a defendant's due process rights under the Fourteenth Amendment. Maxwell v. Roe, 628 F. 3d 486, 506-07 (9th Cir. 2010)("[A] defendant's due process rights were violated ... when it was revealed that false evidence brought about a defendant's conviction."); Killian v. Poole, 282 F. 3d 1204, 1208 (9th Cir. 2002). See also Hall v. Director of Corrections, 343 F. 3d 976, 981-82 (9th Cir. 2003), Mooney v. Holohan, 294 U.S. 103, 112, 55 S. Ct. 340, 79 L. Ed. 791 (1935). "The principle that a State may not knowingly use false evidence, including false testimony, to obtain a tainted conviction [is] implicit in any concept of ordered liberty ...." Napue v. Illinois, 360 U.S. 264, 269, 79 S. Ct. 1173, 3 L. Ed. 2d 1217 (1959). In other words, whenever the State seeks to obfuscate the truth-seeking function of a court by knowingly using false testimony or misleading argument, the integrity of the judicial proceeding is placed in jeopardy. "A conviction obtained through use of false evidence, known to be such by State violates the fourteenth Amendment." Napue, 360 U.S. 269 (internal citations omitted). Surely then known false evidence to deprive a defendant of property must meet the same bar. Common sense and the fair administration of justice must prevail where a material fact is misrepresented in a Giglio, Napue context it cannot then be legitimized and rewarded by becoming the law of the case under any scenario.

The record is clear at Mayer's forfeiture hearing on remand Mayer raised the fact the lender was not as the Appellate

stated "FDIC insured." Mayer referenced the prosecutors "slippage" at trial of a non existent FDIC insured status and specifically pointed to a trial exhibit which falsely claims the lender to be FDIC insured. In short Mayer presented the issue at the District Court which Mayer was entitled to appeal.

This case presents a significant issue of a defendant's property and due process rights under the Fifth and Fourteenth Amendments of the United States Constitution. Whether if the Government retains any liability post conviction to correct known fraud material to protect a defendant's rights in forfeiture and when indeed the law of the case doctrine attaches.

This case also represents an important milestone in the raising of the bar by the Eleventh Circuit in acceptable conduct by offices of the Court.

IV

Conclusion

For the reasons stated herein, Petitioner Stephen Mayer proceeding pro se respectfully prays that this Court issue a writ of certiorari to review the judgment of the United States Court of Appeals for the Eleventh Circuit. Respectfully submitted by Stephen Mayer this 29th day of July 2018 by depositing a copy of this writ in the prison mailbox system in accordance with 28 U.S.C. § 1746.

By: _____

July 29, 2018.
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