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SUPREME COURT, U.S.

IN THE SUPREME COURT OF THE UNITED STATES

William Benjamin Brown,  
petitioner,

v.

Andrew mansukhani,  
warden,

NO: 18-5760

### Objections to the Brief for the United States

Comes now, William Benjamin Brown, pro se, wish to file objections to this late Brief, 11 days, not the (25) petitioner are going to argue and show this Court, His petition should be Granted.

petitioner argue the government's Brief, was receive Today 12/31/2018, petitioner argue the magistrate Judge wrote a report and Recommendation 4/10/2017, See Appendix - I page 10. it is Recommended that the petition in this action be dismissed without requiring Respondent to file a refile.

petitioner argue on 4/26/2017, The Honorable Mary G. Lewis TEXT ORDER denying [13] Report and Recommendation. The Judge Remanded it back to the magistrate Judge with directions to require Respondent to file a response to the petition. petitioner argue on April 27, 2017, the Honorable Mary G. Lewis, United States District Judge, remanded this case to the undersigned with directions to require Respondent to file a response to the petition.

( ECF NO. 17. See Appendix-F - The Court Order. )

petitioner argue the government's Brief, on page 10.  
Stat: Second, the magistrate judge was directed to file a second  
report and recommendation. See 16-cv-3079 Docket entry, NO.  
17. (D.S.C. Apr. 26, 2017); 28 U.S.C. 631(b)(1)(B). His doing so was not  
error. (False Statement's).

petitioner argue and will show, (wrong was done.) The  
Docket entry, NO. 17; petitioner argue the magistrate judge wrote  
everything to say what He wanted it to say. The Ruling by the District  
Court Judge was not made apart of Docket entry NO. 17. The  
government is saying now, Docket entry, NO. 17 is saying His  
doing so was not error. (False Statement's). and that the  
Magistrate Judge was directed to file a second report and recom-  
mendate. False Statement's. See Appendix-D At NO. 17  
petitioner argue not only Did the Magistrate Judge not make  
District Court Judge ruling apart of the Civil Docket For  
Case # 9:16-cv-03079. MGL. 17 TEXT ORDER re 13 Report  
and Recommendation. pending before the Court is the Report  
and Recommendation 13 in which the magistrate Judge suggests  
the Court dismiss the petition without prejudice and without  
requiring Respondent to file a return. petitioner argue  
and ask this Court, to look at what the Magistrate Judge went  
on to say, in Appendix-D of NO. 17 After writing what He  
wanted too. The Magistrate Judge went on to say, however, this  
action is REMANDED to the magistrate Judge with directions  
to require Respondent to file a response to the petition.

petitioner argue and ask this Honorable Court

to Look At Appendix-E; I read: TEXT ORDER denying [13] Report and Recommendation. The Magistrate Judge Did not write this ruling, petitioner argue the government's Brief is wrote without any Supporting Document's.

petitioner argue the Court was giving, On April 24, 2017, the Honorable Mary G. Lewis, United States District Judge, remanded this case to the undersigned with directions to require Respondent to file a response to the petition. ELF NO. 17.

See Appendix-F C/A NO. 9:16-3079-mgl-BM ORDER TO RESPONDENT:

Respondent shall file an answer or other response to the petition as soon as reasonably possible but no later than fifty (50) days from the date of service.

See Appendix-41 Document Number: 41

TEXT ORDER. The Respondent filed a motion to dismiss the petition on June 16, 2017. Since Respondent did not address in it's filing the issue raised by the District Court in it's Order filed on April 26, 2017. [Remanding the action to the undersigned in light of the position the government took in *Surratt v U.S.*, petitioner argue the Magistrate Judge Did all this to do and say what He wanted. went on to say: Since Respondent's reply brief is currently due on Friday, July 21, 2017 and the Court is directing the inclusion of this matter in his reply, the Reply deadline is extended until Wednesday, July 26, 2017.

by Magistrate Judge on 7/19/2017.

petitioner argue the Magistrate Judge gave Date's when He sent out and Order Appendix-41 State: June 16, 2017 Respondent filed a motion to dismiss, but did not address in

its filing the issue raised by the District Court in its Order filed on April 26, 2017.

petitioner argue the magistrate Judge did what He wanted to Do, saying the Honorable Mary Geiger Lewis signed, and now, the government's Brief is arguing the Court Order on April 27, 2017, page 11 of the government's Brief, read, that order merely, remanded the case to the magistrate Judge for further consideration. petitioner argue and say, The Brief of the government is just like this conviction. It's without any supporting documents. On April 27, 2017, the Honorable Mary G. Lewis, United States District Judge, remanded this case to the undersigned with directions to require Respondent to file a response to the petition. ECF No. 17. The government's Brief is through false statements,

petitioner argue there is nothing showing the Honorable Mary G. Lewis taking Her ruling back, and asking the magistrate Judge to file a SECOND report and recommendation. From the government's Brief, the magistrate Judge Did all the filing, and saying what the ruling was, using the Judge's name to support his doing. The Docket Text Don't show the Judge overruling Her TEXT ORDER denying [13] report and recommendation. OR Do anything from the Court say, the Judge ordered a SECOND report and recommendation, petitioner argue the government's Brief is without any supporting documents,

petitioner argue the government's Brief is stated. As the magistrate Judge pointed out, although Michigan law restores a felon's right to vote on completion of his sentence, it does not restore his right to sit on a jury.

Petitioner argue the government Brief on page 11 is talk about what the magistrate Judge pointed out about Michigan Civil Right's Law. Petitioner argue prior to this Illegal INDICTMENT and Arrest, Michigan State Law, IAI: Froede v. Holland Ladder & Mfg. Co., 207 Mich. App. 127, 523 N.W. 2d 849 (Mich. Ct. App. 1994). Was decided by a panel of the Michigan Court of Appeals on October 3, 1994. In Froede, the Michigan Court held that "a former felon's right to serve as a juror was restored once the sentence was completed" because section 600.1307 a (e)" only requires that a potential juror not be under sentence for a felon at the time of jury selection and because juror qualifications are a matter of legislative control." 523 N.W. 2d at 852. Hampton v. United States, 191 F. 3d 695; (6th Cir. 1999) also see United States v. Tait, 202 F. 3d 1320, (11th Cir. 2000) read: Michigan Law provides for the automatic reinstatement of all Civil rights of convicted felons following release from custody and completion of probation. Thus, once the defendant completes his sentence, all or essentially all of his Civil rights, namely, his right to vote, to hold public office, and to serve on a jury, are restored automatically by the force of the very Michigan laws that suspended them. Petitioner argue His sentence was complete by Discharged, without any Condition of Release. No Probation or parole. Petitioner argue the government's Brief is arguing without any Michigan Certified Copies of Judgment of Any Michigan Conviction.

Petitioner argue the government Brief is arguing about Michigan's ruling on registration as a sex offenders. Petitioner argue there have never been a Judgment of Conviction, for petitioner to Register. If there was a

Failure to Register, it would have been a violation from Michigan. This Conviction have NO Certified Copies of Judgment of Any Michigan Conviction. Also Supporting Document's.

petitioner argue Michigan 750.110 did not and do not qualify as predicate violent felony under ACCA as statute's terms were broader than generic burglary, and it was not divisible.

petitioner argue, Thus, all of petitioner's key rights were restored at the time he was charged (191 F.3d 703) with a violation of § 922(g). Because his rights were so restored from the 1986 conviction, it appears that petitioner plead guilty to a charge to which he was actually innocent because the Government could not satisfy all of the elements of the § 922(g) charge. By making such a showing, petitioner is entitled to have his defaulted claim reviewed on collateral attack. Hampton v. United States, 191 F.3d 695, (6th Cir. 1999)

834 F.3d 696 Doe v Snyder (6th Cir. 2016)

CASE SUMMARY Retroactive application of amendments to the Michigan Sex Offender Registration Act (SORA) violated the Ex post Facto Clause, U.S. Const. Art 1, § 9, Cl. 3, because SORA imposed punishment; among other factors, SORA met the general definition of punishment and significantly restrained how registrants could live their lives.

1. petitioner argue the government's argument is not what the District Court ruling was in it's Court,

6.

Order. See Appendix-F On April 27, 2017, the Honorable Mary G. Lewis, United States District Judge, remanded this case to the undersigned with directions to require Respondent to file a response to the petition. ECF No. 17 Petitioner argue ~~the~~ was to be answered, no later than (50) days.

petitioner argue June 16, 2017, See Appendix-41 The Magistrate Judge Entered this Order. TEXT ORDER. The Respondent filed a motion to dismiss the petition on June 16, 2017. Since Respondent did not address in its filing the issue raised by the District Court in its Order filed on April 26, 2017.

petitioner argue the government are stating the Magistrate Judge was directed to file a second report and recommendation. (False).

petitioner argue michigan law, only place of Conviction. See Appendix-C page 10. The defendant discharged from custody on the maximum date allowed, March 17, 2008. Until its decision in Hampton, the Sixth Circuit had held that "Michigan law [did] not fully restore a felon's civil rights for purposes of § 922(g) because a Michigan felon [was] restricted from serving on a jury." Hampton, 191 F.3d at 701. Upon the decision of a Michigan Court of Appeals in Froede v. Holland Ladder & Mfg. Co., 207 Mich. App. 127, 523 N.W.2d 849 (1994), the Sixth Circuit revisited the issue of restoration of civil rights in Hampton. See also United States v. Tait, 54 F. Supp. 2d 1100 (S.D. Ala. 1999) (applying the holding in Froede); United States v. Bolton, 32 F. Supp. 2d 461 (S.D. Tex. 1999) (Same). The Hampton Court held that since under the decision in Froede, michigan law restored the defendant's right to serve on a jury, in addition to his right to hold office and right to vote, that the defendant's civil rights

had been restored under michigan law. Given the fact that the defendant's Civil rights were restored under michigan law, his prior felony conviction could not count against him under § 921(e)(2) for purposes of § 922(g)(1).

petitioner argue the government Brief was untimely. 11 days, not counting the 25. mail was burning.  
[It's Default]

### Conclusion

The petition for the writ of Certiorari should be Granted.

Respectfully Submitted.

William B. Brown

Date: 1/4/2019