

18-8550

No. _____

Supreme Court, U.S.
FILED

FEB 14 2019

OFFICE OF THE CLERK

IN THE
SUPREME COURT OF THE UNITED STATES

ERNEST M. FLOWERS — PETITIONER
(Your Name)

vs.

THE STATE OF FLORIDA — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

THE FLORIDA SUPREME COURT
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)
AMENDED
PETITION FOR WRIT OF CERTIORARI

ERNEST MARQUIS FLOWERS

(Your Name)

WALTON CORRECTIONAL INSTITUTION
691 INSTITUTION ROAD

(Address)

DEFUNIAK SPRINGS, FLA. 32433

(City, State, Zip Code)

(Phone Number)

ORIGINAL

QUESTION(S) PRESENTED

WHETHER PETITIONER IS BEING UNLAWFULLY
DETAINED IN THE FLORIDA DEPARTMENT OF
CORRECTIONS UNDER "TRULY INCONSISTENT
VERDICTS" CONTRARY TO FLORIDA SUPREME
COURT PRECEDENT AND WAS THE RESULT OF
A "MALICIOUS PROSECUTION" THAT INVOLVED
SEVERAL ACTS OF "PROSECUTORIAL" AND -
"JUDICIAL" MISCONDUCT DURING THE
PETITIONER'S TRIAL, SENTENCING, AND
APPELLATE PROCEEDINGS VIOLATING THE
PETITIONER'S 1TH, 5TH, 6TH, 8TH, AND 14TH -
AMENDMENT RIGHTS OF THE UNITED STATES
CONSTITUTION AND RESULTED IN A -
FUNDAMENTAL MISARRIAGE OF JUSTICE?

LIST OF PARTIES

[] All parties appear in the caption of the case on the cover page.

[✓] All parties **do not** appear in the caption of the case on the cover page. A list of all parties to the proceeding in the court whose judgment is the subject of this petition is as follows:

1. THE FLORIDA SUPREME COURT.
500 SOUTH DUVAL STREET
TALLAHASSEE, FLORIDA 32399-1927
2. THE THIRD(3RD) DISTRICT COURT OF APPEAL.
2001 S.W. 117TH AVENUE
MIAMI, FLORIDA 33175
3. THE ELEVENTH(11TH) JUDICIAL CIRCUIT COURT
1351 N.W. 12TH STREET
MIAMI, FLORIDA 33125
4. THE MIAMI DADE COUNTY STATE ATTORNEY OFFICE,
1350 N.W. 12TH AVENUE
MIAMI, FLORIDA 33136.
5. THE FLORIDA DEPARTMENT OF CORRECTIONS,
OFFICE OF THE SECRETARY, MARK INCH,
501 SOUTH MONROE STREET
TALLAHASSEE, FLORIDA 32399

IN THE
SUPREME COURT OF THE UNITED STATES

PETITION FOR WRIT OF CERTIORARI

Petitioner respectfully prays that a writ of certiorari issue to review the judgment below.

OPINIONS BELOW

☐ For cases from federal courts:

The opinion of the United States court of appeals appears at Appendix _____ to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the United States district court appears at Appendix _____ to the petition and is

☐ reported at _____; or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

☒ For cases from state courts: _____

The opinion of the highest state court to review the merits appears at Appendix C to the petition and is

☐ reported at (SC18-1687); or,
☒ has been designated for publication but is not yet reported; or,
☐ is unpublished.

The opinion of the THIRD (3RD) DISTRICT COURT OF APPEAL court appears at Appendix B to the petition and is

☒ reported at U/K (3D14-2989); or,
☐ has been designated for publication but is not yet reported; or,
☐ is unpublished.

JURISDICTION

☐ For cases from **federal courts**:

The date on which the United States Court of Appeals decided my case was _____.

☐ No petition for rehearing was timely filed in my case.

☐ A timely petition for rehearing was denied by the United States Court of Appeals on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A .

The jurisdiction of this Court is invoked under 28 U. S. C. § 1254(1).

☒ For cases from **state courts**:

The date on which the highest state court decided my case was DEC. 19TH 2018.
A copy of that decision appears at Appendix C .

☐ A timely petition for rehearing was thereafter denied on the following date: _____, and a copy of the order denying rehearing appears at Appendix _____.

☐ An extension of time to file the petition for a writ of certiorari was granted to and including _____ (date) on _____ (date) in Application No. A .

The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

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STATEMENT OF THE CASE AND FACTS

1. ON JUNE 17TH, 2002 (FOLLOWING A MAY 27TH, 2002 ARREST), THE MIAMI DADE COUNTY, FLORIDA, STATE ATTORNEY'S OFFICE CHARGED PETITIONER, ERNEST M. FLOWERS, AND TWO (2) CODEFENDANTS - JOHN DE BECKMAN, AND NICOLE LATRESE BAGBY, IN A SIX (6) COUNT FELONY INFORMATION WITH: "BURGLARY WITH ASSAULT OR BATTERY" (FLA. STAT. 810.02(2)(a)) (COUNT-ONE); "ATTEMPTED FELONY MURDER" (FLA. STAT. - 782.051(1)) (COUNT-TWO); "ROBBERY WITH A FIREARM" (FLA. STAT. 812.13-(2)(a)) (COUNTS - THREE, FOUR, FIVE, AND SIX).
2. ON MAY 10TH, 2004 (AFTER SEVERING DEFENDANTS), PETITIONER FLOWERS, PROCEEDED TO TRIAL BY JURY ON ALL COUNTS, IN THE ELEVENTH (11TH) JUDICIAL CIRCUIT COURT, FOR MIAMI DADE COUNTY, FLORIDA (CASE # FG2-155456), REPRESENTED BY PRIVATELY RETAINED COUNSEL, MICHAEL I. FINESZLVER, ESQUIRE, BEFORE THE HONORABLE KEVIN M. EMAS.
3. ON MAY 12TH, 2004, THE JURY RETURNED ITS VERDICT, FINDING PETITIONER FLOWERS, "GUILTY" OF BURGLARY WITH ASSAULT OR BATTERY WITH A FIREARM - (COUNT-ONE); "NOT GUILTY" OF "ATTEMPTED FELONY MURDER" (COUNT-TWO); AND "GUILTY" OF "ATTEMPTED (SIMPLE) ROBBERY," AS A LESSER INCLUDED OFFENSE (DEGREE) TO "ROBBERY WITH A FIREARM" (COUNTS - THREE, FOUR, FIVE, AND SIX), RESULTING IN "TRULY INCONSISTENT VERDICTS" PROHIBITED UNDER FLORIDA LAW.

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4. ON JUNE 30TH, 2004, THE TRIAL COURT (HON. KEVIN M. EMAS), ADJUDICATED PETITIONER FLOWERS GUILTY AND ENTERED ITS JUDGMENT, SENTENCING PETITIONER FLOWERS TO: (COUNT-ONE) "LIFE WITH FIFTEEN (15) YEARS MINIMUM MANDATORY," AS A HABITUAL VIOLENT OFFENDER (H.V.O.); AND TO A TERM OF TEN (10) YEARS WITH FIVE (5) YEARS MINIMUM MANDATORY, "AS A HABITUAL VIOLENT OFFENDER (H.V.O.), ON COUNTS THREE (3), FOUR (4), FIVE (5), AND SIX (6), TO RUN CONCURRENT WITH EACH OTHER, BUT CONSECUTIVE TO THE LIFE SENTENCE IMPOSED ON COUNT ONE (1).

5. ON JULY 12TH, 2005, DUE TO THE FACT THAT PETITIONER FLOWERS'S CHARGES AROSE FROM A "SINGLE CRIMINAL EPISODE," REQUIRING PETITIONER FLOWERS' SENTENCES TO BE RUN/SERVED CONCURRENTLY, APPOINTED APPELLATE COUNSEL, LISA WALSH, ESQUIRE, FILED A RULE 3.800(b), MOTION TO CORRECT SENTENCING ERROR, UNDER FLA.R. CRIM. P. 3.800(b).

6. ON AUGUST 9TH, 2005 (IN PETITIONER'S ABSENCE), THE TRIAL COURT, HON. KEVIN M. EMAS, GRANTED APPELLATE COUNSEL'S "RULE 3.800(b) MOTION TO CORRECT SENTENCING ERROR," AND MODIFIED PETITIONER-FLOWERS' SENTENCES TO BE "RUN CONCURRENT" ON ALL COUNTS, ALSO THEREIN, PREJUDICIALLY UPGRADING PETITIONER FLOWERS'S - CONVICTIONS FOR "ATTEMPTED ROBBERY" (3RD DEGREE FELONIES), TO THE GREATER OFFENSES OF "ATTEMPTED ARMED ROBBERY" (2ND DEGREE FELONIES) HIGHER THAN PETITIONER FLOWERS' VERDICT RETURNED BY JURORS, ON COUNT THREE (3) THROUGH SIX (6), IN ATTEMPT TO CURE THE "TRULY INCONSISTENT VERDICTS," SUBJECTING PETITIONER FLOWERS TO BE TWICE PLACED IN "JEOPARDY" FOR THE SAME OFFENSE(S), CONTRARY TO THE FIFTH (5TH) AND FOURTEENTH (14TH) AMENDMENTS OF THE UNITED STATES CONSTITUTION, AND ARTICLE I, SECTION 9, AND 17, OF THE - FLORIDA CONSTITUTION, RESULTING IN A FUNDAMENTAL - MISCARRIAGE OF JUSTICE.

7. ON FEBRUARY 22ND, 2006, THE THIRD (3RD) DISTRICT COURT OF APPEAL, FOR THE STATE OF FLORIDA, ISSUED AN ORDER PER CURIAM - AFFIRMING PETITIONER FLOWERS' JUDGMENT AND SENTENCES WITHOUT AN OPINION BARRING REVIEW IN THE FLORIDA - SUPREME COURT. SEE FLOWERS V. STATE, 920 SO.2D 8 (FLA. 3RD - DCA2006) (CASE # 3D04-1885).
8. ON JUNE 13TH, 2012, THE (TRIAL COURT) ELEVENTH (11TH) JUDICIAL CIRCUIT COURT, FOR MIAMI DADE COUNTY, FLORIDA, ISSUED AN "ORDER PROHIBITING" PETITIONER FLOWERS FROM FURTHER PRO SE FILINGS, PURSUANT TO AN APRIL 17TH, 2012, ORDER DENYING/ORDER TO SHOW CAUSE DENYING PETITIONER FLOWERS' MOTION FOR POSTCONVICTION RELIEF, "RAISING A LACK OF SUBJECT MATTER JURISDICTION, THAT RESULTED IN A VOID JUDGMENT, IN VIOLATION OF PETITIONER FLOWERS 1ST AMENDMENT RIGHT TO PETITION THE GOVERNMENT FOR REDRESS OF INJURIES UNDER THE UNITED STATES CONSTITUTION, AND RIGHT TO "ACCESS THE - COURTS," GUARANTEED UNDER ARTICLE I, SECTION 21, OF THE - FLORIDA CONSTITUTION.
9. ON FEBRUARY 2ND, 2015, PETITIONER FLOWERS, FILED AN "AMENDED PETITION FOR WRIT OF HABEAS CORPUS," IN THE THIRD (3RD) - DISTRICT COURT OF APPEAL, FOR THE STATE OF FLORIDA, (WHERE THE HON. KEVIN M. EMAS, PETITIONER FLOWERS' TRIAL JUDGE CURRENTLY PRESIDES AS AN APPELLATE JUDGE WITH SEVERAL OTHER APPELLATE JUDGES WHO WERE COLLEAGUES OF AND PRESIDED AS CIRCUIT JUDGES IN THE ELEVENTH (11TH) JUDICIAL CIRCUIT COURT FOR MIAMI DADE COUNTY, FLORIDA) RAISING THREE (3) GROUNDS FOR RELIEF.

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10. ON MAY 13TH, 2015, A THREE(3) JUDGE APPELLATE PANEL, FOR THE THIRD(3RD) DISTRICT COURT OF APPEAL (WHICH ALSO INCLUDED PETITIONER FLOWERS' TRIAL JUDGE, THE HON. KEVIN M. EMAS), ISSUED AN ORDER DENYING PETITIONER - FLOWERS' FEBRUARY 2ND, 2015, "AMENDED PETITION FOR WRIT OF HABEAS CORPUS," RESULTING IN A "CONFLICT OF INTEREST."

11. ON MAY 27TH, 2015, PETITIONER FLOWERS, FILED A RULE "9.330(a), MOTION FOR REHEARING," PURSUANT TO FLA.R. APP.P. 9.330, INFORMING THE THIRD(3RD) DISTRICT COURT OF APPEAL, OF THE "CONFLICT OF INTEREST" BY PETITIONER - FLOWERS' TRIAL AND SENTENCING JUDGE, THE HON. KEVIN M. EMAS, - PRESIDING ON THE APPELLATE PANEL DENYING THE FEBRUARY 2ND, 2015, - "AMENDED PETITION FOR WRIT OF HABEAS CORPUS."

12. ON JUNE 17TH, 2015, THE THIRD(3RD) DISTRICT COURT OF APPEAL, ISSUED AN "ORDER GRANTING" PETITIONER FLOWERS' RULE "9.330(a), MOTION FOR - REHEARING," THEREBY, RECUSING JUDGE, KEVIN M. EMAS, AND AGREEING TO HAVE A "NEW APPELLATE PANEL" CONSIDER PETITIONER FLOWERS' FEBRUARY 2ND, 2015, "AMENDED PETITION FOR WRIT OF HABEAS - CORPUS," ONCE A REPLACEMENT JUDGE TO REPLACE JUDGE EMAS, HAS BEEN DESIGNATED.

13. ON JULY 8TH, 2015, THE THIRD(3RD) DISTRICT COURT OF APPEAL, ISSUED AN "ORDER DENYING" PETITIONER FLOWERS' FEBRUARY 2ND, 2015, - "AMENDED PETITION FOR WRIT OF HABEAS CORPUS," IN WHICH, THE COURT'S JULY 8TH, 2015 ORDER WAS AN EXACT "REPLICA" OF ITS MAY 13TH, 2015 - "ORDER DENYING" PETITIONER FLOWERS' "AMENDED HABEAS CORPUS PETITION," WHICH SIMPLY REPLACED JUDGE, KEVIN M. EMAS'S NAME, WITH THE NAME OF JUDGE BARBARA LAGOA.

14. ON NOVEMBER 24TH, 2015, PETITIONER FLOWERS, FILED A "MOTION TO REINSTATE PRIOR APPEAL" / AND/OR "TO CONDUCT A WRIT OF ERROR REVIEW" RAISING A MANIFEST INJUSTICE.

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15. ON FEBRUARY 6TH, 2016, PETITIONER FLOWERS RECEIVED A FEBRUARY 1ST, 2016, "PRINT OUT" OF THE "CASE STATUS DOCKET," FROM THE THIRD (3RD) DISTRICT COURT OF APPEAL, (CASE # 3D14-2989), WHERE PETITIONER FLOWERS DISCOVERED UPON EXAMINATION OF THE CASE DOCKET, THAT THE COURT HAD ISSUED A "DECEMBER 11TH, 2015, ORDER DENYING PETITIONER FLOWERS' NOVEMBER 24TH, 2015, "MOTION TO REINSTATE PRIOR APPEAL," BY A THREE (3) JUDGE APPELLATE PANEL, THAT AGAIN INCLUDED PETITIONER FLOWERS' TRIAL AND SENTENCING JUDGE, HON. KEVIN M. EMAS, AND RESULTED IN A "RECURRING CONFLICT OF INTEREST," ALSO THEREBY, WITHHOLDING ITS ORDER OF DENIAL FROM PETITIONER FLOWERS, WHICH PREVENTED PETITIONER FLOWERS FROM FILING A TIMELY RULE 9.330(a), "MOTION FOR REHEARING," INFORMING THE COURT OF THE "RECURRING CONFLICT OF INTEREST," DENYING PETITIONER FLOWERS' RIGHT TO - PROCEDURAL DUE PROCESS AND EQUAL PROTECTION OF THE LAW, AS GUARANTEED BY THE FOURTEENTH (14TH) AMENDMENT OF THE UNITED STATES CONSTITUTION, AND ARTICLE I, SECTION 9, OF THE FLORIDA CONSTITUTION.

16. ON FEBRUARY 16TH, 2016, PETITIONER FLOWERS, FILED A "BELATED MOTION FOR REHEARING," INFORMING THE THIRD (3RD) DISTRICT COURT OF APPEAL, OF THE SECOND (2ND) "CONFLICT OF INTEREST" INVOLVING PETITIONER FLOWERS' TRIAL JUDGE, THE HON. KEVIN M. EMAS.

17. ON MAY 4TH, 2016, THE THIRD (3RD) DISTRICT COURT OF APPEAL ISSUED AN ORDER DENYING PETITIONER FLOWERS' FEBRUARY 16TH, 2016, "BELATED MOTION FOR REHEARING," THEREBY, REFUSING TO CORRECT THE "RECURRING CONFLICT OF INTEREST," AND ALSO PREJUDICIALLY ISSUED MAY 4TH, 2016, "ORDER PROHIBITING" PETITIONER FLOWERS FROM FURTHER PRO SE - FILLINGS, IN THE THIRD (3RD) DISTRICT COURT OF APPEAL, ADDING INSULT TO CONSTITUTIONAL INJURIES IN VIOLATION OF THE 1ST AMENDMENT OF THE UNITED CONSTITUTION TO PETITION THE GOVERNMENT FOR REDRESS, AND/OR THE RIGHT TO ACCESS THE COURTS, UNDER ARTICLE I, SECTION 21, OF THE FLORIDA CONSTITUTION.

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18. ON OCTOBER 3RD, 2018, PETITIONER FLOWERS FILED AN "EMERGENCY PETITION FOR WRIT OF QUOD WARRANTO," IN THE FLORIDA SUPREME COURT, RAISING SEVERAL CONSTITUTIONAL AND DUE PROCESS VIOLATIONS, THAT INVOLVED PROSECUTORIAL AND JUDICIAL MISCONDUCT, WHICH ADVERSELY AFFECTED PETITIONER FLOWERS' TRIAL, SENTENCING, AND APPELLATE PROCEEDINGS, RESULTING IN A FUNDAMENTAL MISARRIAGE OF JUSTICE, SUBJECTING PETITIONER FLOWERS TO UNLAWFUL RESTRAINT OF LIBERTY.

19. ON DECEMBER 19TH, 2018, THE FLORIDA SUPREME COURT, ISSUED AN ORDER DENYING PETITIONER FLOWERS' "EMERGENCY PETITION - FOR WRIT OF QUOD WARRANTO" AS "PROCEDURALLY BARRED," THEREBY, ALLOWING THE FUNDAMENTAL MISARRIAGE OF JUSTICE TO PROCEED UNCORRECTED.

20. AMONG OTHER ERRORS THAT OCCURRED DURING PETITIONER - FLOWERS' MAY 10TH - 12TH, 2004 TRIAL PROCEEDING, CONTAINED IN THE OCTOBER 3RD, 2018, "PETITION FOR WRIT OF QUOD - WARRANTO," THE STATE OF FLORIDA (1) WITHHELD/SUPPRESSED FAVORABLE IMPEACHMENT EVIDENCE OF PHOTOGRAPH'S THAT DEPICTED SEVERAL INJURIES TO PETITIONER FLOWERS' "FACE AND TORSO" INFLICTED BY ARRESTING OFFICER, - ANTHONY GREEN, WHO'S CURRENTLY UNDER INVESTIGATION FOR THE THIRD (3RD) SHOOTING DEATH/USE OF EXCESSIVE FORCE IN THE LINE OF DUTY, (2) KNOWINGLY UTILIZED PERJURED TESTIMONY OF LEAD DETECTIVE, FERNANDO MORALES TO DOWN CAST NEGATIVE TEST RESULTS - PERFORMED ON PETITIONER FLOWERS, (3) COMMENTED ON PETITIONER FLOWERS' RIGHT TO REMAIN SILENT BY TELLING JURORS WHAT PETITIONER FLOWERS, COULD HAVE BUT DID NOT TELL POLICE, (4) REPEATEDLY IMBEDDED INFERENCES OF GUILT AND/OR THAT PETITIONER FLOWERS HAD CONFESSED BY IMPROPERLY BOLSTERING ARRESTING OFFICER'S TESTIMONY DURING CLOSING ARGUMENTS, ETCETERA..

REASONS FOR GRANTING THE PETITION

PETITIONER FLOWERS, RESPECTFULLY SUBMITS, THAT WHERE PETITIONER - FLOWERS, HAS BEEN PREJUDICIALLY "BLACK BALLED" FROM ACCESSING THE "TRIAL" AND "APPELLATE" COURTS OF MIAMI DADE COUNTY, - FLORIDA, TO SEEK REDRESS OF THE ACTS OF "PROSECUTORIAL," AND "JUDICIAL" MISCONDUCT, THAT RESULTED IN A FUNDAMENTAL MISCARRIAGE OF JUSTICE, TAINING PETITIONER FLOWERS' JUNE 30TH, 2004, JUDGMENT AND CONVICTION, AND/OR WHERE PETITIONER FLOWERS, IS BEING SUBJECTED TO "UNLAWFUL - DETENTION," PURSUANT TO "TRULY INCONSISTENT VERDICTS," AND HAS USED THE PAST SIXTEEN (16) YEARS CONSTRUCTIVELY ASSESSING, AND RESTRUCTURING HIS LIFE, WHILE ALSO EMPLOYING THE VAST PRACTICES AND PROCEDURES OF - "STATE" AND "FEDERAL" LAW, TO SHOW HIMSELF APPROVED BEFORE THE COURTS, AND WORTHY OF A FAIR AND FINAL CHANCE, TO RIGHT SOME OF THE WRONGS THAT BEGAN AT THE AGE OF TWELVE (12) YEARS OLD. IN WHICH, PETITIONER FLOWERS, HOPES TO OBTAIN A DEGREE IN PARALEGAL - STUDIES, AND USE HIS PAST "EXPERIENCES" AND "HARDSHIPS" ON THE WRONG SIDE OF THE LAW, AS A TESTIMONY IN - YOUTH OUTREACH MINISTRY, TO MENTOR AND HELP DETER - "AT RISK YOUTHS" FROM "GANGS AND GUN VIOLENCE". AND ALSO IN HELPING DISCOVER THEIR "HIDDEN TALENTS," WHEREAS, - PETITIONER FLOWERS, PRAYS THAT THIS HONORABLE SUPREME COURT, WOULD GRANT THE FOREGOING PETITION FOR WRIT OF CERTIORARI, AND CURE THE "MISCARRIAGE OF JUSTICE" THAT WAS THE PRODUCT OF BOTH "PROSECUTORIAL" AND "JUDICIAL" - MISCONDUCT, SUBJECTING PETITIONER FLOWERS, TO BEING "BLACK BALLED" FROM ACCESSING THE "TRIAL" AND "APPELLATE" COURTS, IN MIAMI DADE COUNTY, FLORIDA, AND "RESTRAINED" UNDER "UNLAWFUL DETENTION," PURSUANT "TRULY INCONSISTENT VERDICTS." CONTRARY TO THE 1ST, 5TH, 6TH, 8TH, AND 14TH AMENDMENTS OF THE UNITED STATES CONSTITUTION, AND ARTICLE I, SECTIONS 9, - 17, AND 21, OF THE FLORIDA CONSTITUTION.

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WHEREFORE, PETITIONER FLOWERS, RESPECTFULLY HEREBY MOVES THIS THIS HONORABLE SUPREME COURT, TO EXERCISE ITS SUPREME JURISDICTION, TO GRANT THE INSTANT PETITION FOR WRIT OF CERTIORARI, AND UNDO THE YEARS OF INJUSTICE SUFFERED BY PETITIONER FLOWERS, AND ALLOW HIM A FINAL CHANCE TO USE THIS YEAR AS A FRESH START TO RIGHT SOME OF HIS WRONGS ON THE PATH OF HELPING TROUBLED AT RISK YOUTH, WHO ARE HEADED DOWN THE SAME DARK PATH PETITIONER FLOWERS, HAD BLINDLY TRAVELED AS AN ADOLESCENT HAVING NO GUIDANCE OR SENSE OF DIRECTION IN LIFE, AND HEREBY, RESPECTFULLY MOVES THIS HONORABLE COURT TO DIRECT THE FLORIDA DEPT. OF CORRECTIONS, AND/OR THE STATE OF FLORIDA TO "CEASE AND DESIST" PETITIONER FLOWERS' UNLAWFUL DETENTION.

CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Ernest M. Flowers

Date: February 14th, 2019