

No. 18-9447

ORIGINAL

IN THE  
SUPREME COURT OF THE UNITED STATES

Supreme Court, U.S.  
FILED  
FEB 27 2019  
OFFICE OF THE CLERK

QUINTIN IRVING BROWN — PETITIONER  
(Your Name)

vs.

COUNTY OF NEW KENT, VIRGINIA RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

SUPREME COURT OF VIRGINIA  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Quintin Irving Brown  
(Your Name)  
Dillwyn Correctional Center / 2B-17B  
P.O. Box 670 / 1522 Prison Road  
(Address)

Dillwyn, VA 23936-0670  
(City, State, Zip Code)

(434) 983-4200  
(Phone Number)

**QUESTION(S) PRESENTED**

- I. WHEN A CONVICTION OCCURS IN ANY STATE OF THE UNITED STATES WHERE A COUNTY'S JURISDICTION OCCURS OVER 2,200 YARDS BEYOND ITS 300-YARD PERMISSIBLE JURISDICTION WILL THAT CONVICTION BE REVERSED?

## 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:

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OTHER

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[ ] is unpublished.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[ ] is unpublished.

[x] For cases from state courts:

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

[ ] reported at \_\_\_\_\_; or,  
[ ] has been designated for publication but is not yet reported; or,  
[x] is unpublished.

The opinion of the \_\_\_\_\_ 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[ ] is unpublished.

## 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 11/29/2018. A copy of that decision appears at Appendix A.

A timely petition for rehearing was thereafter denied on the following date: \_\_\_\_\_, and a copy of the order denying rehearing does not appear at Appendix A.  
<sup>NOT</sup>

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).

## **CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

The Bill Of Rights of the Constitution of the United States Of America

## STATEMENT OF THE CASE

I, Quintin Irving Brown, hereby state and depose under oath that these facts are true and correct:

I was born Wednesday, May 13, 1953, in Wilmington, New Hanover County, North Carolina. On Friday, December 11, 2015, I was living in the city of Norfolk, Virginia, at 409 West 27th Street, where I was caring for my soulmate and best friend, Diane Judge, who was on Home Hospice Care after suffering from breast cancer, cerebral infarction, acute venous thrombosis, carotid artery occlusion, cerebral vascular accident, acute ischemic stroke, aspiration pneumonia, acute kidney failure and cerebral edema.

I was due in City Of Richmond General District Court-Manchester Traffic Court at 9:00 a.m., Friday morning, Decemcer 11, 2015, some 102 miles from where I cared for my life partner. I left at 5:55 a.m. in my 1999 purple 4-door Saturn sedan from Norflok, Virginia and was traveling Interstate 64 West at 65 miles per hour in the right-hand lane through Hampton and Newport News and James City County and Williamsburg, Virginia. I eneterd New Kent County, Virginia at some Mile Marker after Mile Marker 227 (in descending order). After Mile Marker 214, I noticed a Chrysler police vehicle in my rearview mirror. The car weighed 2350 pounds and the morning was windy as I navigated down thwestbound right lane. Just after Mile Marker 211 the police vehicle pulled into the left lane parallel to me and the decal revealed that this was a New Kent County Sheriff's Office car and I saw the New kent County insignia on the uniform of the deputy sheriff driving alone in the vehicle. The deputy lokked over at me and slowed down and continued to follow me at 65 miles per hour. Just after Mile Marker 209, I saw the 70 miles per hour speed limit sign and I put on my left hand turn signal to indicate that I was switching to the left hand lane of the 2-lane interstate highway, and I did so and sped up to 70 miles per hour. The New Kent County sheriff's car did the same. I traveled to Mile Marker 205 and approximately 1.4 miles later in Mile Marker 204 I saw the "Entering Henrico County Leaving New Kent County" sign. About 450 yards from Mile Marker 203, I saw a line of 18-wheeler tractor-trailer truck at the Weigh Station ahead. At 100 feet from Mile Marker 203 in front of the Weigh Station (some 1.3 miles into Henrico County after being followed more than 11 miles), I signaled for a right hand lane change and did so.

## REASONS FOR GRANTING THE PETITION

At the 100 feet point from Mile Marker 203 the emergency lights were activated by the sheriff vehicle, and I stopped 25 feet from from the Mile Marker 203. At this point I was 1.3 miles from the New Kent jurisdiction that ended 300 yards from the County Lines sign.

The arrest that ensued was in Henrico County where the stop actually was initiated and occurred. Reasons for this conviction to be reversed are that the Motion To Suppress Evidence should have been granted.

New Kent County proceedings were and are courtesy non judice.

New Kent County proceedings were and are non causa non judice.

### CONCLUSION

Lack of territorial jurisdiction renders any judicial decision invalid and void ab initio.  
The petition for a writ of certiorari should be granted.

Respectfully submitted,

Quinton L. Boyles

Date: February 27, 2019

SUBSCRIBED AND WORN TO BEFORE ME  
THIS 27<sup>th</sup> DAY OF February, 2019

E. Boyles  
NOTARY PUBLIC



E. BOYLES  
NOTARY PUBLIC  
Commonwealth of Virginia  
Registration #7728847  
My Commission Expires Jan. 31, 2021