

No. \_\_\_\_\_

18-9513

IN THE

SUPREME COURT OF THE UNITED STATES

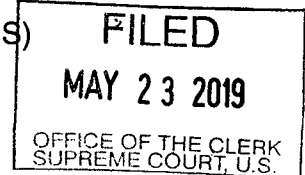
\_\_\_\_\_

Rhonda Reid — PETITIONER  
(Your Name)

vs.

State of Georgia "et al" — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO



U.S. Court of Appeal for the Eleventh Circuit  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Rhonda Reid  
(Your Name)

1760 Carey Station Rd.  
(Address)

Greensboro, GA. 30642  
(City, State, Zip Code)

(706) 980-8523  
(Phone Number)

QUESTION(S) PRESENTED

I'm asking why did Judge Prior Sign a restitution Order in my name on 4-12-11

Why did the trial judge make a decision on his own not to afford me a hearing; however, Under D.C.G.A. § 17-14-7(b)

Why didn't the trial judge afforded me a restitution hearing. Why did the trial judge allow the ADA

Mauldin to present to my jury the White women went to prison when in fact they knew they didn't

Send the white women Tammy Bettis. How could the trial judge sign the white women false

Plea and then serve as my trial judge and how was the trial judge allow the white women

to tell my jury she went to prison when she didn't go. How did this trial judge take my

Children from me for know reason ages from 6mo's to 9 years old. How could the trial judge

and the ADA Mauldin merges counts on 4-12-12 when I knew nothing about the plea deal on

4-12-11. How or why did 3 African American went to prison & not the white women How did

Judge Prior Conflict all of this. Why did the trial Judge Willful Misconduct in, office and persistent to

Perform duties. Why did you take my teaching degree my childcare license  
ER Clerk

## 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. Tammy Bettis - Owner, Tax Services
2. Donnie Harrison - Sheriff
3. Stephen A. Bradley - D.A.
4. Trent Brown - Judge
5. Allison Mauldin - State Prosecutor,
6. Prior Jr., Hon. William - State trial judge
7. Hugh Ridgeway - Attorney
8. Scott Smith - Captain
9. Wendy Smith - Probation Officer
10. Ann Wilson - investigator
11. Chris Houston - Former Sheriff
12. Fredric Bright - Former D.A.
13. Mike Harrison - false police officer
14. Christopher C.R. - Attorney General
15. Land, Hon. Clay - United State District Judge,  
Middle District of Georgia
16. George Boyer - Parole Officer
17. Walter Donnelly - Parole Officer

## TABLE OF CONTENTS

OPINIONS BELOW .....	1
JURISDICTION.....	
CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED .....	
STATEMENT OF THE CASE .....	
REASONS FOR GRANTING THE WRIT .....	
CONCLUSION.....	

## INDEX TO APPENDICES

APPENDIX A U.S. COURT OF APPEAL

APPENDIX B U.S. District Court Middle District of Georgia

APPENDIX C Green County Superior

APPENDIX D

APPENDIX E

APPENDIX F

## TABLE OF AUTHORITIES CITED

CASES

PAGE NUMBER

N/A

STATUTES AND RULES

N/A

OTHER

N/A

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 A 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 B 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 \_\_\_\_\_; or,

☐ has been designated for publication but is not yet reported; or,

☒ 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 5-19-19.

☐ 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 \_\_\_\_\_.  
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).

**CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED**

N/A



## STATEMENT OF THE CASE

I was unlawfully restrained of my liberty, being imprisoned and fined by the Presiding Judge Prior. Assistant District Attorney, Allison Mauldin, was allowed to present to the jury during deliberation that I had already plea guilty to one of the two counts of the RICO violation and ordered to restitution. However I did not plea.

Mr. Ridgeway also deprived me of my Constitutional rights to effective assistance of counsel by his failure to properly investigate the circumstance of my case. ADA Mauldin Pre-Sentenced False Evidence to the jury, which violates my Due Process and Judge Prior knew she was lying.

Under Napue v. Illinois, knowing presenting evidence of false testimony violates ~~the~~ my due process as provide under the 14<sup>th</sup> Amendment Napue v. Illinois, 360 U.S. 244 (1959). Here ADA Mauldin presented to the jury testimony from Co-Defendant Bettis that had served fifteen month sentence in a Correctional facility.

## Statement OF THE CASE

At all times, Mrs. Mauldin knew this information was false evidence violates the 14th Amendment right to due process. Further, trial Counsel should have been prepared to attack such false information by obtaining Ms. Bettis' inmate information and asking her question about her facility was her incarceration. However trial Counsel failed to do his job, and ADA Mauldin pre-sentenced false evidence to the jury to sway the jury into believing that Ms. Bettis admitted her fault and served her time. In actuality only the 3 African American women served time in a state correctional facility prison, while the main culprit, Ms. Bettis' white women escaped without serving time any time. If the jury was presented with evidence from trial Counsel that Ms. Bettis did not attend a prison that would have swayed the jury to think in the opposite direction, especially after knowing that the state witness who had just falsely plea guilty, provided false testimony and the ADA and trial judge was aware the entire time.

Page 2 Appendix C

## Statement of Case

Further, Defense Counsel deprived my of my constitutional right to effective assistance of counsel by his failure to properly challenge the competency of witnesses. Co Defendant Tammy Bettis. Suffered from memory loss and abused pain killers. Perferably Lortabs and the list goes on. Which the defense attorney counsel to challenge Ms. Bettis testimony as her being incompetent, and possibly a medical review before any further testimony was given, or a least a judicial determination.

As such all the claim above indicate that I'm indeed entitled to a hearing on my habeas to show the court 1) The ADA Presented false evidence as to a restitution 2) Trial Counsel was ineffective that lack of effectiveness of counsel cost I'm convicted of violating the RICO Act, and 3) Violation of my due process right to have a restitution hearing. Because of all of this I lost my Teaching license, ERClerik, Child care license  
Appendix C  
Page 3

## Statement of Case

During the sentencing, my trial attorney, Mr. Ridgeway, requested a hearing to determine the fine/restitution portion of the RICO Act as statutorily required under O.C.G.A. § 17-4-7(b) Sentencing phase at 419:6-8

Adverse Collateral consequences can be found through recidivist statutes, parole consequences and even "the stigma and burden of an invalid sentence." *Hardison v. Martin*, 254 Ga. 719 (1985) The adverse collateral consequences may continue past the completion of any sentence resulting from the allegedly invalid conviction if the petitioner has a substantial stake in the judgment of conviction which survives the satisfaction of the sentence imposed on him or her *Hardison* at 721; *Carafas v. LaVallee*, 391 U.S. 234, 237 (1968) "The mere fact that the state sentence has been completely served should no longer be a bar to attacking it through Habeas."

APPENDIX C

Statement of Case

I tried filing my own Appeal. I was informed I had to file the notice in Green County Superior Court. However the Clerk of Court would not except my Notice of Appeal in order to submit the official transcript to the Court of Appeal. The Court of Appeal never received an official transcript from this court. I have never plea guilty to any count of violating the RICO Act. In which ADA Mauldin presented inaccurate information provided to the jury, which led the jury to convict me ILLEGALLY for violating RICO. I have never been tried for the second count of violating the RICO Act. The Sentencing any second count of itself. was ILLEGALLY I should have never been convicted and sentence for two counts of violating the RICO Act Mr. Ridgway knew I have never signed a plea agreement. Moreover, I requested a restitution hearing, and was never offered my statutory rights to a hearing as provided under D.C.G.A. 17-14-7(b).

## Statement of Case

I'm claiming 1) the Constitutionality of the Charge; 2) alleging that the Prosecutor knowing presented false evidence; 3) the validity of a guilty Plea that was never given 4) information given during Jury deliberations and verdict was invalid and false 5) ineffective Counsel and 6) and illegal sentencing

During sentencing my trial attorney Mr. Ridgeway requested a hearing to determine the fine / restitution portion of RICO Act, and the judge granted me the opportunity to present evidence against restitution for a later date as to statutorily required under O.C.G.A. 17-14-4(b) transcript pag 423 line 14-25. The trial judge tried to commingle a Criminal Case with a Civil hearing and that isn't proper, because I'm allowed to present evidence in the Civil hearing.

After many attempt to get Mr. Ridgeway to file a Notice of Appeal, Mr. Ridgeway failed to file a Notice of Appeal within 30 days from the Sentencing order as required by Georgia Law, and as requested by me.

I filed a grievance with the the State Bar GA on Mr. Ridgeway as a grievance with the Judicial Qualifications Commission on Judge William Prior.

page 10

APPENDIX C.

## REASONS FOR GRANTING THE PETITION

Imagine Yourself in my Predicament, after Years of hard work trying to live a normal life, but feeling like a Slavey to Judge William Prior and the system. I'm asking for this petition to be granted because myself and my family would be in tremendous danger. I've been incarcerated for 3 years, placed on parole for 4 years and now serving probation for 13 more years of my life due to (2) illegal counts of violating RICO. If I'm not granted this Petition, I'm at risk as to being placed back in Prison for a crime I didn't plea to and that I don't deserve. I'm begging for my freedom back because just living is not enough. I've served my time and my children need to feel safe again if I have to go thirteen (13) more year of my life on probation that would make me a Slave to 40 years Slave of my life to Judge William Prior JR. for his personal use & political use if I don't do something about it.

~~Appendix~~

### CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Rhonola Reid

Date: May, 21, 2019