

19 - 5244

No. _____

ORIGINAL

IN THE

SUPREME COURT OF THE UNITED STATES

FILED

DEC 12 2018

OFFICE OF THE CLERK
SUPREME COURT, U.S.

Larry David Davis — PETITIONER
(Your Name)

vs.

LT Detective Brian Daniel ET AL RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Eighth Circuit Court of Appeal of ST Louis, Mo
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Larry David Davis
(Your Name)

880 East Gaines ST
(Address)

Dermott, Arkansas 71638-9505
(City, State, Zip Code)

(Phone Number)

RECEIVED

MAR 12 2019

OFFICE OF THE CLERK
SUPREME COURT, U.S.

QUESTION(S) PRESENTED

1. Can Clark County Arkansas Prosecutor and Detectives have me arrested at my home at 686 Ayers Street in Memphis Tennessee on April 21st, 2017 without Probable Cause and without a warrant by the Memphis, Tennessee Sheriff Deputies, and lie to the Arkansas State Supreme Court in response to my Rule 37 Petition for Post conviction Relief and say that they (Clark County Arkansas) arrested me June 27th, 2017, 2 months and 6 days after they had me arrested by 2 Memphis Tennessee Shelby County Sheriff Deputies?
2. Is Clark County Arkansas Police coming and getting me from in Memphis Tennessee Shelby County Jail 21 Poplar and taking me over 2 hundred miles across the Tennessee State line 5-19-17, taking me from Memphis, Tennessee to Clark County Arkansas Jail without a warrant and without Probable Cause unconstitutional?
3. Does the Prosecutor assessment of Probable Cause standing alone meet the requirements of the Fourth Amendment and is it enough to justify restraint of Liberty Pending trial for 6 months and ten days then a 30 years Prison term conviction?
4. Does the Prosecutor filing an information against me close my right to a preliminary hearing or Brinkley hearing and any Presenting of evidence to see whether there is Probable Cause and to see whether the Prosecutor have evidence for detaining me indefinitely?

questions Presented

5. can I be locked up and sent to Prison on the Prosecutor and Police word alone with a 30 year Prison term on theft 2500 to 5000, commercial Burglary, Bor E and never arrested But Brought from over 2 hundred miles from another state and accused of these charges?
6. can an accused Person be indefinitely detained in custody merely because he has been charged by information as distinguished from a grand Jury indictment, without an indictment by a Grand Jury?
7. can the Prosecutor and my Lawyer hold back on giving the pictures of the store that I'm charged with committing a theft until after they until after my Lawyer and the prosecutor mentally forcibly trick me into a Plea of no contest of 30 years for a theft that did not happen and I did not commit, and 2 weeks later my Lawyer mail me the Pictures from the Prosecutor that is a different store than I was charged with and convicted for and no crime is happening on the Pictures?
8. is when clark county Arkansas convicted me without any evidence to support my conviction unconstitutional?

QUESTIONS Presented

9. if this theft occurred 75 to one hundred miles away from clark county Arkansas, which is 3 counties away from clark county Arkansas can clark county Arkansas still charge me with these charges when the crime did not happen in clark county Arkansas?
10. is this 75 years an illegal sentence even though it is 30 yrs, 30 yrs, and 15 yrs running concurrent?
11. can clark county Arkansas give me no Public court appearances having nobody in the court room besides me and the Judge and my Lawyer 5-19-17 and 8-28-17, and then be my only court appearances other than setting me for trial 10-12-17 then 10-29-17 have my trial on a day when they dont have court and the court building is not open to the Public and the courtroom have no People in it besides me the Judge and the Prosecutor and my Lawyer and the court reporter, and when They bring me inside the courtroom the 2 Detectives and the chief of Police that's suppose to be witnessess against me is sitting in the Jury Box?
12. if I am innocent and this southfork Theft crime did not happen and they knew that it did not happen isn't charging me with it framing me?

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:

LT Detective Brian Daniel, Detective Russell
and Prosecutor Blake Badston, Kim Gie is Part owner
of Southfork Truckstop, Clark County Sheriff Department

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TABLE OF AUTHORITIES CITED

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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 Circuit Court of Clark County Arkansas court appears at Appendix D 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 October 12th 2018

I did not petition for a rehearing
☐ 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 11-7-2018.
A copy of that decision appears at Appendix _____.

☐ A timely petition for rehearing was thereafter denied on the following date: I never petitioned for a rehearing, 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

4th Amendment: The right of the people to be secure in their Persons, houses against unreasonable searches and seizures, shall not be violated and no warrant shall issue, but upon Probable cause, supported by oath or Affirmation, and Particularly describing the Places to be searched, and the Persons or things to be seized

5th Amendment: No Person shall be held to answer for a capital or otherwise infamous crime, unless on a presentment or indictment of a grand jury, nor shall be compelled in any criminal case to be a witness against himself, nor be deprived of Life, Liberty without due process of Law.

6th Amendment: in all criminal Prosecutions, the accused shall enjoy the right to a speedy and Public trial, by an impartial jury of the State and District wherein the crime shall have been committed, which district shall have been previously ascertained by law and to be informed of the nature and cause of the accusation: to be confronted with the witnesses in his favor, and to have the assistance of Counsel for his defense.

Constitutional And Statutory Provisions involved

8th Amendment: Excessive Bail shall not Be

Required nor Excessive fines imposed, nor

cruel and unusual Punishments inflicted.

14th Amendment: All Persons born or naturalized in

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

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

April 21st I was awoken from my sleep at my house and told to put my clothes on by a Memphis Tennessee Sheriff deputy that was pointing a gun at me in my Bedroom at 686 Ayers St in Memphis, TN 38107 on 4-21-17 without a warrant while his Sheriff deputy partner was talking to my neices in the living room and I was taken to 201 Poplar Jail in Memphis TN. where I was booked into Shelby County Jail in Memphis Tennessee without a warrant for Clark County Arkansas. I fought Extradition for 3 weeks going back and forth to court. on my fourth court date, my Lawyer Mr Tatum told me that my charges that I'm being held for Arkansas is only a misdemeanor a theft of 2 hundred and 80 dollars and a commercial Burglary. so he advised me that the quickest way for me to get out would be for me to waive my right to extradition and let Arkansas come and pick me up and make Bond because my Bond would not be no more than 5 thousand Dollars and that I could pay 5 hundred Dollars and get out. and I desperately needed to get back home where my grandchildren and family was at waiting for me. so I waived Extradition and May 19th, 2017 Clark County Arkansas Transport police came and picked me up from 201 Poplar Jail in Memphis, Tennessee without a warrant and took me over 2 hundred miles across the Tennessee State line to a small town name Arkadelphia with the population of 13 thousand people in Clark County Arkansas. I made it to they Jail at 3: o'clock within 20 to 30 minutes They had me in front of they Judge Greg Vardaman. nobody besides me and my lawyer and the Judge was in the courtroom. Judge Greg Vardaman read me the misdemeanor charge of theft of 2 hundred and 80 dollars and commercial Burglary and a Breaking ~~and~~^{or} Entering charge and then after

Judge Greg Vardaman read the misdemeanor charge Theft of 2 hundred 80 dollars and commercial Burglary and Breaching or Entering then gave me a 75 thousand dollar Bond. I asked him could he give me a lower more reasonable Bond and he said No so I asked him when was I going to have my Preliminary hearing and he told me to talk to my Lawyer and I Let him know that I did not commit the charges that I was charged with then I was taken back to the jail where a guard finish booking me in and I was taken to the back of they jail and just held in they jail without going back to court until 3 months later after my first appearance in court may 19th they had me sleeping on a concrete slab with a real thin cot on it. LT Detective Brian Daniel and Detective Russel talked to me about the misdemeanor theft of 2 hundred and 80 dollars without reading me my myranda rights then Brian Daniels who was doing all the talking told me about another theft where he said a lot of money was stole out of a office and he said that store was not in clark county jurisdiction and that a nother Police from that district was coming and talk to me later about that theft. I let him know

that I didn't commit any theft he kept telling me that I was in a whole lot of trouble and that I had come to the wrong state. I hadn't come to the wrong state they brought me to the wrong state I was thinking. So I let him know that I had not been passing through the state of Arkansas since 2008 so I didn't commit these crimes of Theft. After talking to LT Daniel. Chief Collier came into the room and question me about the exact same theft of 2 hundred dollars and I let him know that I would like to remain silent and talk to my lawyer so that was pretty much over with for the questioning I told him that I knew nothing about the theft, and I didn't do it. and I was from Memphis, TN, then I was taken back to the Back of the Jail where I was held then a month later a Police came and Brought me 2 warrants June 27th, 2017 one about a misdemeanor theft and commercial Burglary and Breaking and Entering 3 charges for one incident, then the second warrant that he gave me was for a theft of 5 thousand to 25,000 dollars that was the one that Brian Daniel was telling me was not in his jurisdiction no this warrant got Brian Daniel name on it as the affiant who got the warrant for the theft that he said was not in his jurisdiction about what he called a lot of money came up missing from a Southfork Truck Stop. now my son and my oldest sister came up with 17 hundred dollars back home in Memphis Tennessee and hired me a Lawyer in Little Rock Arkansas my sister mailed him a Traveler check certified mail the end of June so that I could have a Lawyer defending me because I told My son and sister when I called them that they was framing me. so 2 weeks later 7-14-17 The Lawyer came to visit me and Brought me my motion of Discovery

and I asked him when was I having my Preliminary hearing where the prosecutor present the evidence and he told me that they dont do preliminary hearings there. so I asked him about getting my Bond lowered and he told me that they wasnt going to do that. the gaund took me back to the cell and I read my motion of Discovery my lawyer had just gave me. and the theft of 5 thousand to 25,000 that 2 months ago just about on may 22nd, 2017 that LT Brian Daniel told me was not his Jurisdiction about the Truck stop theft now his name was on the papers in the motion as the Detective that was bringing the charges about the Southfork Truckstop theft against me after he had he had told me that the southfork Truckstop was not in his Jurisdiction. now the Arkansas state crime Laboratory Paper got his name as the Detective. the state crime Laboratory paper State that my finger print did not match the Black Box of the 5 thousand to 25 thousand Dollar theft at the Southfork Truckstop 8-1-17 a month later my Lawyer visit me the second ^{time} and tell me that when they Booked me into the clark county Jail and took my finger prints 5-19-17 they sent my finger prints that they took to the Arkansas state crime Laboratory to be matched up with the Black Box that the money came out of and my finger prints came ^{back} a match to the prints on the Box. which is a 4th Amendment and 14th Amendment Violation of the United States constitution. evidence pursuant to an illegal arrest. But I Know that I had never been to this Southfork Truckstop That They was accusing me of getting this money out of this store I'm from Memphis Tennessee which is over 2 hundred miles from clark county Arkansas and I had no reason to come all the way to clark county Arkansas. I Know nobody in clark county AR, I Know not one person in the whole state of Arkansas,

I know for a fact that I have not been to Southfork Truckstop so I know that they are framing me. I learned through another inmate in Clark County Jail that the theft happened 15 miles outside of Texarkana Arkansas which is 75 to 100 miles from Clark County. This inmate knew the man who stole the money out of the office of the store. LT Detective Brian Daniel was right the theft didn't happen in Clark County Arkansas, the inmate told me that it happened in Ashdam Arkansas right outside Texarkana about 15 miles before you get to the Texarkana city limits. LT Detective Brian Daniel and Detective Russell lied like it happened in Clark County. Brian Daniel did all the talking when they questioned me Russell did not say a word. He was just staring at me the whole time and Brian Daniel is the one whose name that is on the paperwork accusing me of the theft. But they all know that nothing happened at Southfork Truckstop in Gurdon Arkansas which is in Clark County. The judge and the prosecutor Blake Badston and my lawyer Stuart Vess know that didn't no theft happen at Southfork Truckstop in Clark County 4-4-17. I had my lawyer go and take pictures of the inside of Southfork Truckstop so that they couldn't show a video of another store and lie like it was Southfork Truckstop and frame me. And my lawyer did go and take pictures of Southfork Truckstop which was a different shape tile on the floor at the entrance of Southfork Truckstop. The tile on the floor at the entrance of Southfork Truckstop is Big White tile on the floor when you first come into the store. But my lawyer held back on giving me the pictures of what the prosecutor was saying was Southfork Truckstop until after my lawyer coerced me into taking a plea of 30 years at my trial right before it started with the threat that the

Prosecuter Blake Badston was going to get me 1 hundred and 5 years as soon he can get me in trial and that I got a 10 percent chance of winning in trial. I told my Lawyer that that I wasn't going to Plead guilty to some thing that I didn't do and I Know that this southfork crime of Theft didn't even happen, he kept pressuring me with taking the 30 year plea or else I was fixing to get a hundred and five years that day in trial. wasn't nobody in the courtroom but me my Lawyer Stuart Vess The Judge and the prosecuter and the 2 Detectives LT Brian Daniel and Detective Russell and chief Collier they was sitting in The Jury Box watching me. my trial was on a day that it was no court and I wanted a jury Trial I was telling my Lawyer from the time I seen him and I had let him talk me into this Bench trial with me my Lawyer and the Judge from what my Lawyer had been telling me. he told me that I didn't need to go to a Jury trial. that a Bench trial was the Best way to go Because him and Greg Vardaman went to Law school together and was real good freinds. Plus him and The prosecuter Blake Badston was freinds that they play golf together. so he had Been telling me that it was best to have a bench trial and I insisted on the jury trial but after a while I felt that I needed to trust my Lawyer because he Know about the Law not me and I needed his expertise and now all the good things that he promised me in this Bench trial. had disappeared on the very last 15 minutes before my trial and I realized that he had been working with the Prosecuter to get me convicted and he hadn't been working with me he had just been playing like he was working with me. when I asked him about (The) vidieo of southfork Truck stop he said that he had Pictures and that he had left them at his office

So since he kept insisting that it was better for me to take this 30 years than the bench trial I told him that I wasn't taking all this time for something that I didn't do then looking at the every fact that every body who was in that courtroom was against me and the police and Detectives was in the Jury Box I told him again that I didn't commit these thefts and he told well I can plead no contest and I told him that I will Plead no contest because I didn't commit the crimes Plus now me and my Lawyer was arguing in the courtroom so I knew that I had no chance of winning because every body in the court was white and totally against me and I ~~wasn't~~ ^{wasn't} fixing to have a Public Trial and I wasn't from the state of Arkansas. and I realized that they had brought me all the way there exactly for this courtroom lynching the 21st century way by giving me so much time until it will be a whole lot of years before I get out and then when I get out I will be tied to them for the rest of my life, So I had to plead no contest Because that I hadn't committed the crime and I knew that the crime didn't happen in clark county Arkansas although they had lied like it happen in clark county in order to frame me. they did whatever they had to do to convict me. even though it was not within the law. they avoided Presenting evidence by denying me my preliminary hearing. they said on my appeal of my rule 37 Petition for post conviction relief on the court appearances that they gave me a ominus hearing but they didn't give me an ominus hearing they never presented any evidence in order to put me in a position where I had to plea Bargain or get ran over by they ~~book~~ crooked unjust Judicial System. and the Preliminary hearing is an very important part of due process of guaranteed by the 5th and 14th admendment of the united states constitution leading to the indictment by a grand jury. they avoided the indictment by a grand jury my Lawyer worked with them and help them deny me my right to

my Preliminary hearing and he told me that they don't do Preliminary hearings there, so they don't Present evidence until trial. which is a violation of my Due process guaranteed by the 5th and 14th Amendment of the United States constitution 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 without Due process of Law, nor deny to any Person within its Jurisdiction the equal Protection of the Laws. even though I'm not from Arkansas and have never stayed one day in my life in the state of Arkansas, I am still a citizen of the United States. I was born at John Gaston Hospital in 1967 on Crump & Lamar at the corner of Pauline which is today The Med. I was raised on main street a mile away and down the street from the Clifford Davis federal building and then we moved to Henry street then Seventh street then to 1227 Firestone then to 1188 n Bellevue street then to 686 Ayers street in Memphis Tennessee where Clark county Arkansas had me arrested without a warrant and I did not have no other charge in Memphis, Tennessee. I was just held for Clark county Arkansas. I asked my Lawyer about ^{Stuart Vess} get my Bond Lowered and he told me they aint going to do that, that's a 8th Amendment violation to hold me in they Jail without no relief with nothing on me just to say that I stole money out of this Southfork Truck Stop and I did not know anything about Clark county until they took me there. I knew for sure that I hadn't never been to Clark county and I knew that the Detective Brian Daniel ^{and} Detective Russell was framing me with the help of they Prosecutors Blake Badston I knew the Judge was knowing it and going along with it. I was in they Jail on just charges of filed information alone that's unconstitutional. an accused Person cannot be indefinitely

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detained in custody merely because he has been charged by information, as distinguished from grand jury indictment with commission of an offense. I was never indicted by a grand jury. clark county do not have a grand jury that meet in clark county. clark county dont do indictments. me not being indicted is a violation of the 5th Amendment of the united states constitution which clearly state that no person shall be held to answer for a capital, or otherwise infamous crime, unless on a presentment or indictment of a Grand jury. nor be deprived of life or liberty without due process of Law. which make my conviction unconstitutional. clark county was going to take me to trial and give me 75 years without having to prove that they had enough evidence to take me to trial. so I Plead no contest to keep from getting framed in trial and end up with 75 years by clark county. even though I didn't commit the crime, so I was going to go to trial because I thought that the Lawyer Stuart Vess was going to defend me once he talked me into a bench trial saying it was just going to be just me and him and the judge and prosecutor and him telling me the jury trial I don't need. instead I need to have a bench trial, theft of 2 hundred and 80 dollars. I let my Lawyer know that I didn't commit that theft and when I was going to trial on the South Fork Truck Stop theft and they coerced me into the plea of 30 years. during the plea ritual reading they just throwed a 30 year plea in on the misdemeanor theft that I hadn't even discussed with my Lawyer or nobody and I was so far away from home and my family until I didn't have no support at all during my trial and sentencing so I had nobody to talk to but the Lawyer and I realized during the end 11-29-17 that he was working with them not me

REASONS FOR GRANTING THE PETITION

United States Supreme Court

Larry David Paris

Petitioner

V

Case No. 18-6024

Detective Brian Daniel ET AL

DEFENDANTS

1. I was arrested at my house in Memphis Tennessee without a warrant 4-21-17. a month later Clark County came to the Memphis, TN Jail and Picked me up after Extradition without a warrant and took me over 2 hundred miles across the stateline into Clark County Arkansas to they county jail where I had one court appearance then held for 3 months without taking me to court.

2. I was Denied my Due process of Law I was Denied my right to a preliminary Hearing and they never presented any evidence at all to determine whether there was sufficient evidence against me to warrant presenting my case to a grand jury. and they just left my Bond at 75 thousand Dollars on a theft charge to make sure that I couldn't get out.

The preliminary hearing is an important stage of States criminal prosecution.

3. I was Denied my constitutional right of the 5th amendment: to an indictment by a grand jury and I never waived my rights to any court procedures at all, I wanted the presenting of evidence because I had not committed these crimes of theft, and I knew that they had no evidence. because I did not do these crimes, they avoided the 5th Amendment right to an indictment by a Grand jury They don't have grand juries and they do not

do indictments at all that's why they illegally had me arrested by memphis law authorities 2 hundred plus miles away without a warrant. then came and picked me up and took me all the way ^{there} without a warrant without any probable cause against the 4th and 14th amendment. they don't obey the united states constitution and the preliminary hearing and the indictments is very important in the court prosecution and they give nobody preliminary hearings or indictments. 90 percent of the people they lock up just stay in jail for long periods then they send to prison because they don't present evidence until trial. and an accused person should not be indefinitely held in jail because the prosecutor has charged him by information and never no indictment by a grand jury. and not only did they hold me in they jail for 7 months and 10 days. they also sentenced me to 30 years in prison in they state.

4. (5th - 19th months) when they got me to they jail without a warrant they fingerprinted me and sent my fingerprint to be matched with another theft and said my fingerprint was a match to a black Box that supposed to had money stolen from it at a Truck Stop 4-4-17.
5. They framed me because nothing happen at South Fork Truck Stop 4-4-17. the theft happen 3 countys over from clark county Arkansas but LT Brian Daniels and Detective Russell

Reasons for Granting The Petition

Lied and said that the theft happen at south fork Truckstop and the lady Kim Giel who is Part owner of southfork Truckstop who do insurance fraud scans to get illegal money for fraud untrue acts on her stores lied too about the theft happen at her southfork Truckstop store in order for the frame to be solid and complete so That I would go to prison and the Prosecutors Blake Badston and Judge Greg Vardaman in court knew it and was part of it because They knew that it wasn't True from the start. yet they gave me a 30 year sentences and a 15 year sentence running concurrent for commercial Burglary, breaking ~~off~~ entering for one incident that was a lie about southfork Truckstop which is excessive sentencing for a totally non violent theft that they intentionally lied about happened.

6. They had me arrested illegally without a warrant at my home in front of my 3 year old grandson at gunpoint on 686 Ayers street in Memphis, Tennessee 38107, on April 21st 2017 for Clark County Arkansas by Memphis, Tennessee law enforcement agents. Then once They illegally brought me over 2 hundred miles

Reason for Granting The Petition

Polk

across The Tennessee state line without a warrant They carried they vindictive out on me when they got me over here deep in the back wood Town of Arkansas where they dont go by the law and do whatever they want to.

7. they lied to the Arkansas State Supreme Court about the date that I was arrested in order to make they warrant seem legal and to make it look like I was arrested in Arkansas so that it would look like the Southfork Truck stop Theft really happen. I was arrested at my house in Memphis in April 25th 2017 by 2 Memphis Sheriff deputies in my Bedroom at gunpoint. Clark County Arkansas Told the Arkansas State Supreme Court that they arrested me They self 2 months and 5 days after they had me arrested in Memphis, They changed the arrest date from April 25th 2017 to June 27th, 2017 in response to my rule 37 Petition for Post conviction relief.

8. it's not a police report or nothing on this Theft of Southfork Truckstop. Just the Prosecutor filed a information, and a affidavit where Detective Brian Daniel saying I stole money 5000 to 25,000 from Southfork Truckstop 4-4-17, and they investigated it after it was reported 4-17-17 13 days after the theft suppose to have happen.

9 They had no Probable cause to have me

arrested from the start now they have

illegally brought me over here and took my

fingerprints and wrongfully convicted me and

sent me to the Prison 2 hundred miles from the

State where I am from Tennessee, and a week

after They got me to Clark County Arkansas

Jail and fingerprinted me they gave my finger

prints to Jacksonville Arkansas and now that

I have did the Habeas corpus 2254 on this

illegal unconstitutional conviction of Clark

County Arkansas, Pulaski County where Jacksonville

is located have said they matched my finger

prints to a black box and took me to trial

and gave me another long prison sentence

of 45 years for the exact same charges

2 weeks ago running consecutive to Clark

County 30 making me have 75 years to do

where they making sure that I don't get

out when and if the Habeas corpus determine

my arrest and conviction violated the united

States constitution

10 Actual innocence, Because This south foot

Truck stop Theft did not happen it so I did

not do it

Reasons for Granting the Petition

10. coerced Plea of no contest
my Lawyer Pressured me into Pleading
on the charge by telling me that they had
my fingerprints 3 witnesses and a video in
the courtroom but wouldn't never show
me the video because it wasn't one
if I went in the courtroom and went to trial
on the day of my Trial. and they had none
of these things, he was working with The
prosecuter instead of me.

11. Fake Evidence pursuant to a illegal
arrest: where they had me arrested without a
warrant and finger printed and said they matched
my prints to a Black Box that money was stolen
from and said that my prints matched.

12. no Evidence to support my conviction
because there is no evidence.

13. The wrong Jurisdiction: Because the
Theft happen 75 miles from clark county
which is 3 counties over from clark county

14. Prosecutorial misconduct: Because the
Prosecuter and my Lawyer held back on giving
me the pictures of the store the Prosecuter had
Proving it wasn't the same store and nothing happen at south
fork

Reasons for Granting the Petition

the Prosecutor and my Lawyer did not give me the Pictures that they was saying was Southfork Truckstop until after They Tricked and my Lawyer coerced me into the plea then my Lawyer mailed me the Picture a week after he talked me into taking the Plea right before my trial.

11. illegal Excessive sentence

My arrest was in violation of The 4th and 14th Amendments and
and after clark county illegally arrested me They denied me my
Preliminary Hearing and my Due Process of Law and just held me
in they Jail for months without an Presentment or indictment
by a grand jury in violation of my 5th Amendment right in order
to avoid Presenting evidence to wrongfully convict me and intentionally
to put me in they prison system unconstitutionally for a crime
that did not happen and I did not commit. for the reasons
within and Based on the Authorities cited. I respectfully Pray that
my conviction be reversed in it intirety because the crime did not
happen and I did not commit it and I should be rewarded the 3 million dollars
I am suing for to punish the authorities. CONCLUSION

The petition for a writ of certiorari should be granted.

Respectfully submitted,

Larry David Davis

Date: 3-3-19