

NO. 19-5735

IN THE
SUPREME COURT OF THE UNITED STATES

YOLANDA M. WILLIAMS
PETITIONER
vs

THE STATE OF TEXAS- et.al.
FORMER JUDGE SHAWNA L. REAGIN
PROSECUTOR ALEXIS KRAFFT
FORMER D.A. ALAN CURRY
FORMER ASSISTANT D.A. PATRICIA LYKOS
ATTORNEY RANDALL J. AYERS
ATTORNEY WILLIAMS "BILL" TAYLOR
ATTORNEY BURNELL JONES
RESPONDENTS

ORIGINAL

Supreme Court, U.S.
FILED
JAN 02 2019
OFFICE OF THE CLERK

PETITION FOR A WRIT OF CERTIORARI
TO
THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT COURT

DECLARATION VERIFYING TIMELY FILING

By: 

YOLANDA M. WILLIAMS
Pro se Attorney
P. O. Box 610104
Houston, TX 77208
281-804-8292

CORRECTED ORIGINAL

NO. _____

IN THE
SUPREME COURT OF THE UNITED STATES

YOLANDA M. WILLIAMS
PETITIONER

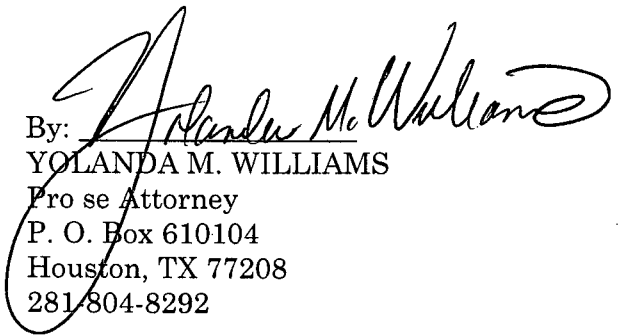
vs

THE STATE OF TEXAS- et. ál.
FORMER JUDGE SHAWNA L. REAGIN
PROSECUTOR ALEXIS KRAFFT
FORMER D.A. ALAN CURRY
FORMER ASSISTANT D.A. PATRICIA LYKOS
ATTORNEY RANDALL J. AYERS
ATTORNEY WILLIAMS "BILL" TAYLOR
ATTORNEY BURNELL JONES
RESPONDENTS

PETITION FOR A WRIT OF CERTIORARI
TO
THE UNITED STATES COURT OF APPEALS FOR THE FIFTH CIRCUIT COURT

DECLARATION VERIFYING TIMELY FILING

Petitioner, Yolanda M. Williams, Pro Se Attorney of record and pursuant to SUP. CT. R. 29.2& 28 U.S.C. 1746 declares that the petition for Writ of Certiorari filed in the above – styled matter was placed in the U.S. Mail in a prepaid Priority Mail Envelope on the 29th day of March, 2019.

By: 
YOLANDA M. WILLIAMS
Pro se Attorney
P. O. Box 610104
Houston, TX 77208
281/804-8292

IN THE
SUPREME COURT OF THE UNITED STATES

YOLANDA M. WILLIAMS

PETITIONER

vs

THE STATE OF TEXAS- et.al.
FORMER JUDGE SHAWNA L. REAGIN
PROSECUTOR ALEXIS KRAFFT
FORMER D.A. ALAN CURRY
FORMER ASSISTANT D.A. PATRICIA LYKOS
ATTORNEY RANDALL J. AYERS
ATTORNEY WILLIAMS "BILL" TAYLOR
ATTORNEY BURNELL JONES

RESPONDENTS

PETITION FOR WRIT OF CERTORARI

TO

UNITED STATES COURT OF APPEALS

FOR THE FIFTH CIRCUIT COURT

By 

YOLANDA M. WILLIAMS

Pro se Attorney

P.O. Box 610104

Houston, TX 77208

281-804-8292

IN THE
SUPREME COURT OF THE UNITED STATES

YOLANDA M. WILLIAMS

PETITIONER

vs

THE STATE OF TEXAS- et.al.

FORMER JUDGE SHAWNA L. REAGIN

PROSECUTOR ALEXIS KRAFFT

FORMER D.A. ALAN CURRY

FORMER ASSISTANT D.A. PATRICIA LYKOS

ATTORNEY RANDALL J. AYERS

ATTORNEY WILLIAMS "BILL" TAYLOR

ATTORNEY BURNELL JONES

RESPONDENTS

PETITION FOR WRIT OF CERTORARI

TO

UNITED STATES COURT OF APPEALS

FOR HE FIFTH CIRCUIT COURT

Yolanda M. Williams respectfully petitions the Supreme Court of the United States for a Writ of Certiorari to review the Judgment of the United States Court of Appeals for the Fifth Circuit Court rendered on October 02, 2018 in case no. 18-20377 of that Honorable court. On January 23, 2018, which affirmed the judgments of the United States District Court Southern District of Texas on January 23, 2013, the Fourteenth Appeals Court of the State of Texas rendered January 23, 2013: a Memorandum opinion, the Pre-Discretionary Review refusal judgment on 09/11/2013 and the sentence of the trial court of Harris County 176th Criminal Court rendered a Judgment on May 22, 2011.

QUESTION(S) PRESENTED

- 1) Whether the defendant forfeited her immunity: failed to comply with elementary principles of procedural process and rendered an in just judgment enforcement. Therefore, causing deprivation of petitioner and her family constitutional rights?
- 2) Whether the Petitioner and her family should render the compensation noted in the "Demand Letter" sent to defendant. Due to the violation of their Constitutional Rights and the in just Judgment or Order?
- 3) Whether the judge, those whom they appoint, or under the judge aegis face criminal prosecution for the violation of the laws of the United States and Constitutional laws?

List of Parties

The parties in this proceeding or persons who have an interest in the outcome of this case are as follows:

1) YOLANDA M. WILLIAMS, et.al

T. A. WILLIAMS

R.A. WILLIAMS

M.C. ROBERTSON

S.A. ALONZO II

S. ALONZO

L. ALONZO

A.M.RODGERS

A. A. WILLIAMS

2) THE STATE OF TEXAS et.al

SHAWNA L. REAGIN

ALEXIS KRAFFT

ALAN CURRY

PATRICIA LYKOS

RANDALL J. AYERS

WILLIAM "Bill" TAYLOR

BURNELL JONES

TABLE OF CONTENT

QUESTIONS PRESENTED..... ii
LIST OF PARTIES..... ii
TABLE OF CONTENTS..... iii
TABLE OF AUTHORITIES..... iv
REFERENCE TO THE OPINION BELOW..... 1
STATEMENT OF JURISDICTION.....1
STATEMENT OF CASE..... 2-3
ARGUMENT.....4-5
REASON FOR GRANTING THE WRIT..... 6-8

CONCLUSION

CERTIFICATE OF SERVICE

APPENDIX

Appendix A1 Judgment of United States Court of Appeals for the Fifth Circuit

Appendix A2 Judgment of the United States District Court Southern District
of Texas Houston, Division.

Appendix A3 The State of Texas Court of Appeals Petition of Discretionary Review

Appendix A4 the State of Texas Fourteenth Court of Appeals

Appendix B The 176thth Criminal District Court of Harris County, TX Final
Decree of Divorce.

INDEX TO APPENDIX

APPENDIX A1 Judgment of United States Court of Appeals for the Fifth Circuit

APPENDIX A2 Judgment of the United States District Court Southern District of Texas Houston

APPENDIX A3 State of Texas Court of Appeals Petition for a Discretionary Review

APPENDIX A4 The State of Texas Fourteenth Court of Appeals

APPENDIX B The 176th Criminal District Court of Harris County, TX Final Judgment.

APPENDIX C Stump v Sparkman

APPENDIX D Weekly v Morrow

APPENDIX E Bradley v Fisher

APPENDIX F Carey v PIPHUS

APPENDIX G 42 U.S.C. 1983

APPENDIX H 28 U.S.C 1257(a)

APPENDIX I 28 U.S.C. 453

APPENDIX J 2nd, 4th, 5th 6th AND 8th Amendments

APPENDIX K Texas Jurisprudence – 3D 27

APPENDIX L Petition for Civil Lawsuit

APPENDIX M Texas Statute of Limitation

APPENDIX N Homeless Information

APPENDIX O Arrest Information

APPENDIX P Notice of Appeal

APPENDIX Q Brief without Oral Argument

APPENDIX R Texas Department Criminal Justice of Prison Discharge

APPENDIX S Demand Letters

APPENDIX T Business Information/previous Income

APPENDIX U Bail Information

APPENDIX V Information estranged husband did not live at

Petitioner home.

TABLE OF AUTHORITIES CITED

CASES	Page Number
Bradley v Fisher.....	6
Carey v. PIPHUS	6
Stump v. Sparkman.....	1
Weekly v. Morrow	6

OTHER AUTHORITIES

42 U.S.C. § 1983 1, 6

28 U.S. C § 453 5

28 U.S.C 1257(a) 1, 6

Second Amendment of the United States Constitution..... 4

Fourth Amendment of the United States of Constitution..... 4

Fifth Amendment of the United States Constitution..... 4

Sixth Amendment of the United States Constitution..... 5

Eighth Amendment of the United States Constitution..... 5

Stand Your Ground Law..... 4

Texas Jurisprudence 3D. 27 6

REFERENCE TO THE OPINION BELOW

The United States Court of Appeals for the Fifth Circuit Court rendered its final judgment on October 02, 2018 (See Appendix A1) On January 23, 2018, the judgment of the United States District Court Southern District of Texas on January 23, 2013(See Appendix A2). The Fourteenth Appeals Court of the State of Texas rendered January 23, 2013: A Memorandum opinion (See Appendix A3), the Petition for Discretionary Review refusal judgment (See Appendix A4), the sentence of the trial court of Harris County 176th Criminal Court rendered a Judgment on May 22, 2011 (See Appendix B). The trial court issued no written opinions in this matter.

STATEMENT OF JURISDICTION

The jurisdiction of this court is invoked under 28 U.S.C. §1257(a). Also, According to Stump v. Sparkman opinion of the court by Mr. Justice White. "This case requires us to consider the scope of a judge immunity from damages liability when sued under 42 U.S.C. § 1983." Stump ET AL. VIR CERTIORARI to the United States Court of Appeals for the 7th Circuit, no. 76-1750. Argued January 10, 1978-Decided March 28, 1978 (See Appendix C, H & G).

STATEMENT OF THE CASE

On the 02nd of October the United States Court of Appeals for the 5th Circuit ruled to dismiss the Appeal of Petitioner according to Robbins v. Maggio, 750 F. 2D. 405,408 (5TH Cir. 1985) (See appendix A1). On the 22nd of January 2018, the Petitioner sued defendant(s) or The State of Texas in the United States District Court for Southern District Texas Houston Division alleging: In just Judgment Enforcement and Civil Rights Violation. Thus, the defendant failed to uphold the Oath of Justice and Judges. (The Oath of Justice and Judges | US | LL | 28 U.S. Code 453 (June 25, 1948; Ch. 646, 62 Stat. 907, Pub. 101-650 title IV, 404, Dec 1, 1990, 104 Stat. 5124.) **(See appendix L, H & I)**

On the 22nd of January,2018, The United States District Court Southern District of Texas Houston Division render a dismissal without prejudice according to 28 U.S.C1915 (e) (2) (B) (ii). (See appendix A2) In which establish the timeliness of the Petitioner Appeal from a Judgment or Order in the 176th District Court. Also, the petitioner is timely because there is no Texas Civil Statue of Limitation on a Judgment or Order. **(See appendix M &A2).**

Also, petitioner alleges defendants fail to uphold the law of the United States Constitution and of the laws of the United States. Defendant failed to exercise the standard of care required by law. In which caused petitioner a great loss of liberty, her children, property, and income. Also, resulted in the unconstitutional imprisonment of the Petitioner, homeless and great damage to her family (children and grandchildren.) **(See Appendix N&T)**

On and about August 05, 2011, petitioner was arrested at the home of her and her children. **(See Appendix O)**

On and about May 16, 2012, the petitioner had a pre-sentence investigation hearing and the PSI was rescheduled. On and about May 22, 2012, petitioner had a rescheduled PSI. **(See Appendix. A3)**

On and about May 22, 2012, Former Judge Shawna L. Reagin enforced a judgment that sentenced petitioner to five (5) years in the Texas Department of Criminal Justice Prison. Petitioner was convicted of Aggravated Assault of a Family Member (estranged abusive husband) **(See APP. B)**

On and about May 22, 2012, Former Judge Shawna L. Reagin granted an appeal to petitioner. On and about November 26, 2012, court appointed appeals attorney:

Randall Ayers. In which, he filed a brief w/o oral argument. **(See appendix P & Q)**

On and about January 31, 2013, The Fourteenth Appeals court affirmed the judgment of the trial court. Chief Hodges, Justice Boyce and Donovan authorized the opinion for the panel. Thus, affirming the appeal to be wholly frivolous and without merit and find no reversible errors in the record. **(See appendix A 4)**

On and about May 08, 2013, Petitioner filed a pro se Petition for Discretionary Review and on August 08, 2013 petitioner filed a redrawn PDR. On and about September 11, 2013, the Petitioner PDR was refused. **(See appendix A3 & PDR – 0192-13 @ www.txcourts.gov/14thcoa.aspx.)**

On and about August 04, 2016 petitioner was released from TDCJ prison. **(See appendix R)**

On and about December 12, 2018 petitioner served a “Demand Letter to the District Attorneys’ Office regarding the matter with no response. **(See appendix S)**

On and about January 25, 2018, Petitioner served a “Demand Letter” to Shawna L. Reagin with no response to resolve the matter. **(See appendix S)**

ARGUMENT

The District Court Proceedings

On and about, August 05, 2011, Petitioner was arrested at the home of her and her children. Petitioner was charged with Aggravated Assault of a Family Member with a Deadly Weapon and the said victim or family member is/was the petitioner estranged abusive husband. On and about May 22, 2012, Petitioner was sentenced to five years via a pre-sentence investigation to the Texas Department Criminal Justice Prison. On and about May 22, 2012 Petitioner was granted an Appeal. **(See Appendix. B, O & R).**

Pursuant to the United States Constitution 2nd Amendment: "A well-regulated militia being necessary to the security of a free state, the right of people to keep and bear arms shall not be infringed. Thus, Grants the right to gun ownership to individual for purpose that includes self-defense." Also, the "Stand Your Ground law, which grants the right to bear arms and protects a person & their family and property. In lieu to threat or in fear harm/attack.

However, the alleged victim in this matter, Reginald A. Williams II did not live at the home; he did not honor the temporary orders by the Harris County 310th Family Court. In turn, the Harris County Sheriff Department was called to the home of Petitioner & her children regarding the matter several days before the incident of the allege victim: harassment & threat to the Petitioner. **(See Appendix V and Harris County Sheriff records).**

Pursuant to the United States Constitution 4th Amendment: "The right of the people to be secure in their persons, houses, papers and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall be issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched and the persons or things to be seized."

On and About August 04, 2011, no questions were asked of the Petitioner, Yolanda M. Williams & her children regarding the matter. Petitioner was simply arrested and later convicted. In turn, Petitioner had the right to be protected by the 4th Amendment, the "Stand Your Ground" Law & the 2nd Amendment. Thus, the allege victim did not live at the home of petitioner & the Sheriff Department was called informing the alleged victim not to return to the home. No probable cause to search the home. No warrant stating exactly what was to be searched at the Petitioner home.

Pursuant to the United States Constitution 5th Amendment: "No person shall be compelled in any criminal case to be a witness against himself, nor be deprived of life, liberty, or private property be taken for public use, without compensation." Due process was

not given to the Petitioner, Yolanda M. Williams: Attorney did not follow procedural of the law of Texas, the Constitution, and the United States and in the 176th Court of Harris County Texas. No witness, No evidences etc. on behalf of the Petitioner. No investigation on behalf of Petitioner, Yolanda M. Williams, (See PDR 0192-13 @ www.txcourts.gov/14thcoa.aspx).

Pursuant to the United States Constitution 6th Amendment: "Guarantees the right to criminal defendants, including the right to a public trial without unnecessary delay, the right to an impartial jury and the right to know who one accuser are and the nature of the charges and evidence against you." The petitioner was informed by the court appointed attorney:

"Plea guilty, the Judge will not send you to prison & if she goes to trial she will get 20 yrs. Petitioner have no prior conviction. Therefore, she had no knowledge of the Criminal Justice System and she was suffering from the abuse of her estrange husband. (See PDR @ www.txcourts.gov/14thcoa.aspx).

Pursuant to the United States Constitution 8th Amendment: Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishments inflicted. (**See Appendix U**) The defendant had a bail of \$30,000 and she continued to ask for a lower bail. Thus, after the conviction and the appeal was granted petitioner bail increase to \$150,000. Yolanda M. Williams was not given the option to be released on her "own recognizance." Thus, has no prior conviction.

Pursuant to 28 U.S.C. §453, The In just Judgment or Order rendered on May 22, 2012: defendant failed to perform the duties as a judge to uphold the oath of justice and judges. Defendant failed to uphold justice without respect of person and equal rights to the poor and to the rich. Thus, causing unconstitutional imprisonment and great damage to the petitioner and her family: No investigation, no witness(s), no evidences and conviction based on alleged victim testimony.

At the time of the 5 years imprisonment Judgment Enforcement by the defendant: petitioner is/was a victim of domestic abuse, a parent of three minor children, and a graduate of the University of Houston Downtown and owned a small business partnership with estranged husband. However, the judgment of the defendant inflicted great damages. In which, the petitioner lost her means to her family and render poverty upon petitioner and a destitution to her family. (App. N, U, T & O).

Thus, pursuant to the Fifth Amendment: petitioner, her children and grandchildren was deprived of life, liberty and property. Thus, petitioner is homeless, unemployed and estranged from her children and grandchildren. In turn, according to 42 U.S.C. 1983.

In it clear that justice was not served in this matter and the petitioner, her children and grandchildren was deprived of their rights and damages/injury was afflicted. Due process was not performed in this matter. In turn, indicates a tort of negligence.

REASON FOR GRANTING THE WRIT OF CERTORARI

The reason for granting this petition: No statute exists, however, granting federal district courts jurisdiction to hear appeals from state court decisions. 28 U.S.C. 1257 provides that "the judgment or decree rendered by the highest court of a State in which a decision could be had may be Weekly v Morrow cite as 204 F 3d 613 5th Cir. 2000 pg. 615. (See APP. D & H).

The State of Texas failed to comply with elementary principles of procedural due process and defendant(s) render an in just judgment or order. Thus, violating the petitioner and her children civil rights and rendering an unconstitutional imprisonment. Also, defendant(s) caused homelessness and great damage/destruction to petitioner family unity. (See App. N) For example, "To most persons who enter the profession, it is a means to support themselves and their family. To deprive one of an office of this character would be to decree poverty to himself and destitution to his family. "Bradley v. Fisher. Opinion of the court pg.355. Thus, the in just judgment or order deprived petitioner of her profession and her means to care for her family. (See APP.E, I, O, &U).

Another reason to grant this petition is due to the failure of the Fourteenth Appeals Court of Harris County Texas to review and correct the judgment render by the lower court. "If a state trial court errs the judgment, it is not void. It is to be reviewed and corrected by the appropriate State appellate court." Weekly v. Morrow cite as 204 F.3d 613 (5th Cir.2000)" page 615 (See APP. D)

Also, this petition should be granted because the defendant(s) fail to uphold the Oath of Justice. Thus, fail to render a judgment of Justice. (See App. I)

In the Texas Jurisprudence 3D 27, Duties and Discretion, generally, Research and Reference, West Key Number Digest. Judge 23, 24. It is the office and duty of a judge to preside over and direct the investigation into the legal rights and responsibilities of those under the judge's aegis, to decide all questions of law that may arise, and to receive and record the verdicts of juries. 1. Absent constitutional and statutory authorization, a judge has no power to conduct judicial business except when sitting as a court." (See App. K pg. 416).

Therefore, the final reason for granting this petition is to render justice:

The basic purpose of a §1983 damages award is to compensate persons for injuries caused by deprivation of constitutional right. Carey Et AL. v. PIPHUS et.al. Certiorari to the United States Court of Appeals for the 7th court. No. 76-1149, argued December 06, 1977 – Decided March 21, 1978. (See APP. F & H).

The Petitioner United States Constitutional Rights was violated as indicated in the statement of the case.

- No investigation
- No Evidence, No witness(s)

- No Mention of Petitioner being a victim abuse
- Petitioner convicted on the testimony of estranged abusive husband and petition of child support for Yolanda Mc Crosse.

Therefore, indicating petitioner, Yolanda M. Williams was Yolanda Mc Crosse and prosecutor Alexis Krafft indicating she shot the alleged victim for his money. In turn, petitioner and defendant had a partnership and Yolanda Mc Crosse is one of the women the defendant had an affair with and defendant Reginald Williams's father a child.

- Excessive bail

On and about January 31, 2013, The Fourteenth Appeals court affirmed the judgment of the trial court. Chief Hodges, Justice Boyce and Donovan authorized the opinion for the panel. Thus, affirming the appeal to be wholly frivolous and without merit and find no reversible errors in the record. (See appendix A4)

In turn, justice was a not served in this matter and was performed in clear absence of all jurisdiction. (See Appendix K pg. 416 & 419). Therefore, former Judge Shawna L Reagin forfeits her immunity.

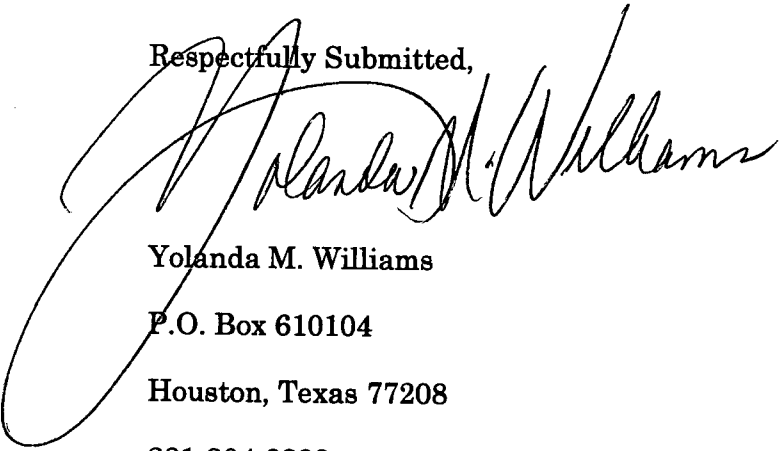
Petitioner, her children and her grandchildren should render the compensation noted in the Demand Letters (See Appendix S).

Conclusion

Based on the forgoing, Petitioner respectfully submits that this petition for Writ of Certiorari should be granted.

Date: *August 20, 2019*

Respectfully Submitted,


Yolanda M. Williams

P.O. Box 610104

Houston, Texas 77208

281-804-8292