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SUPREME COURT, U.S.

Antonio L. Brown

Inmate # 1949570

Petitioner

vs.

IN The United States Supreme
Court

RE-NO. 19-6328

LORIE DAVIS - Director

TEXAS Department of Criminal

Justice - Institutional Division

Respondent

Motion For Rehearing

I, ANTONIO LEONARD BROWN, A TEXAS INMATE PROCEEDING PRO SE, do hereby make these presents to this Honorable Supreme Court in the above listed cause number. For the grounds listed below, a rehearing and the relief sought should be granted:

1- The enhancement laws of TEXAS ARE VAGUE AND CONFUSING. THE LAWS EXACTLY MIRROR THE FEDERAL ENHANCEMENT OF PUNISHMENTS LAWS THAT ARE FEATURED IN THE OPINION OF THIS HONORABLE SUPREME COURT IN JOHNSON vs. UNITED STATES. CITE AS: 576 U.S. 2015. BROWN THEREFORE WISHES TO APPLY THE REASONING AND TENENTS BROUGHT FORTH IN THAT OPINION BY JUSTICE SCALIA TO BEAR ON HIS CASE.

2- Does the Americans with Disabilities Act apply to defendants at trial AND to PRISONERS AFTER SENTENCING? AS NOTED IN ARMSTRONG vs. WILSON, 124 F.3d 109 (9th Cir. 1997)

Grounds For Re-hearing

- 3- IN U.S. vs. KIRWAN, 86 F.3d 309 (2nd Cir. 1996) Federal regulations cannot "trump" or REPEAL ACTS OF CONGRESS. Does this also include the SUPREMACY CLAUSE PASSED BY CONGRESS IN 1832?
- 4- DOES THE LOW INTELLIGENCE OF A DEFENDANT ON TRIAL FOR HIS FREEDOM HAVE ANY SPECIAL SIGNIFICANCE AS TO WHAT THE JURY SHOULD BE INFORMED OF AT TRIAL?
- 5- CAN A STATE JURY TRIAL CARRY ANY SEMBLANCE OF JUSTICE AND FAIR PLAY WHEN A STATE'S WITNESS HOB-NABS WITH JURORS DURING THE TRIAL?

ANTONIO LEONARD BROWN CONTENDS AND SAYS THAT THESE GROUNDS APPLY TO HIS STATE OF TEXAS CASE AND FOR THESE REASONS ASKS FOR A RE-HEARING AND AN APPOINTMENT OF COUNSEL TO BETTER ARGUE HIS POSITION

FOR THIS RELIEF HE SO EVER PRAYS.

Signed And Submitted:

This 20th day of February, 2020

ANTONIO LEONARD BROWN

x Antonio L. Brown

Certification of Grounds

Let this Certificate certify that the grounds stated in this Motion For Re-hearing ARE limited to intervening circumstances of substantial or controlling effect or to other substantial grounds not previously presented.

I declare under the Penalty of Perjury that all of the information contained here-in is true and correct to the best of my Belief and Knowledge. I, Antonio L. Brown do hereby certify this document.

Submitted this 20th day of February, 2020

x Antonio L. Brown

Certificate of Intent

I, Antonio Leonard Brown, Petitioner pro se, in Cause No. 19-6328, do hereby declare and vow to this Honorable Court that the re-hearing that I am seeking in this matter is not done to hinder the normal day to day workings of The Court, but is being done to present a viable and coherent legal argument to the esteemed Justices of The Court, that they may view my grounds and arguments in a light more favorable to my cause.

Also any extension of time requested or granted was asked for in a manner to conform with my above stated Declaration, solely to obtain the relief that I honestly believe is merited and not to delay or obstruct the important workings of this Honorable Supreme Court of the United States of America.

Sincerely Submitted this
20th day of February, 2020

x Antonio L. Brown

DECLARATION OF FILING UNDER RULE 29

By these presents let it be known that I, Antonio L. Brown, Texas inmate # 1949570, Petitioner pro se, in Cause Re-No. 19-6328, have this day placed my Motion for a Re-hearing, into the unit mail box as required by the mail box rule under *Spotsville vs. Cain*, 149 F.3d 374, 378 (5th Cir. 1998) also note *Richards vs. Thaler*, 710 F.3d 573 (5th Cir. 2013)...holding that inmates petition was placed in the Prison mail System on the date it was signed by Petitioner. With First Class Postage pre-paid I have placed it in the unit mail box.

Also please be advised that the Estelle Unit mail room routinely delays delivery of out going and incoming inmate mail. The enclosed letter by Susan Frimpong was dated February 10, 2020 but was not delivered to me till 2-19-20. Nine of the 15 days granted had expired before I received the document. This is an on-going problem.

I declare under the Penalty of Perjury that the information contained herein is true and correct to the best of my belief and knowledge.

Signed this 20th day of February, 2020

x Antonio L. Brown