

19-655

ORIGINAL

Case No.:

IN THE SUPREME COURT OF THE UNITED  
STATES

Supreme Court, U.S.  
FILED

NOV 14 2019

OFFICE OF THE CLERK

*In re* DIMITRI JONTHIEL PATTERSON,  
PETITIONER

**PETITION FOR WRIT OF HABEAS CORPUS**

Date: September 16, 2019



Dimitri Patterson

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## **QUESTIONS PRESENTED**

**Should a Petitioner raising a 28 U.S.C §2241  
Habeas Corpus, remain in State custody without  
certified legal documentation in violation of his  
constitutional rights?**

**PARTIES TO THE PROCEEDINGS BELOW**

The Petitioner is Dimitri Jonthiel Patterson.

The Respondent is Miami-Dade Corrections  
and Rehabilitation Department.

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## **PETITION FOR WRIT OF HABEAS CORPUS**

Petitioner, Dimitri Jonthiel Patterson, hereby respectfully petitions this Court for a Writ of Habeas Corpus.

### **STATEMENT OF JURISDICTION**

This Court's jurisdiction is invoked pursuant to 28 U.S.C. § 2241.

Pursuant to 28 U.S.C. 2242, the Petitioner did not file this Petition with the District Court because the Petitioner has previously filed 28 U.S.C. 2241 Petitions with the District Court, and the District Court has either abused its discretion by citing *Younger v. Harris*, 401 U.S. 37 (1971), or, has exhibited deliberate indifference by refusing to rule.

### **CUSTODY**

The Petitioner is currently being unlawfully detained at the Turner Guilford Knight Correctional

Center (TGK) located at 7000 NW 41st St, Miami, FL  
33166, under Booking Number 180167717.

## **CONSTITUTIONAL AND STATUTORY**

### **PROVISIONS INVOLVED**

The Due Process Clause, which is stated in the *Fifth* and *Fourteenth Amendments* and is a safeguard from arbitrary denial of life, liberty or property by the Government. The *Thirteenth Amendment* abolishes involuntary servitude except as punishment.

28 U.S.C § 2241-The Writ of Habeas Corpus shall not extend to a prisoner unless—  
(1) He is in custody under or by color of the authority of the United States or is committed for trial before some court thereof; or,  
(3) He is in custody in violation of the Constitution or laws or treaties of the United States.

### **STATEMENT OF THE CASE**

Pursuant to Rule 20.4(a), the following  
extraordinary circumstances warrants this Court's  
discretionary powers:

Case B-15-034548 is purported pursuant to  
the Florida Jurisprudence 2d 1151, 1153, 1163, 1164,  
and 1165, and Florida Statute 28.222, which  
constitutes malicious prosecution against the  
Petitioner.

In the clear absence of jurisdiction, Judge  
William Altfield presided over invalid Case B-15-  
034548, where on July 24, 2017, the Petitioner was  
found not guilty by a jury of his peers. On that day,  
rather than the Petitioner freely exiting the  
courtroom as the law states, he was unlawfully held  
by Judge William Altfield and told to return on July  
26, 2017.

On July 26, 2017, when the Petitioner  
returned, Judge William Altfield demanded the State

Attorney to give the Petitioner a “Rule to Show Cause”, which was an invalid action and a clear conflict of interest.

Judge William Altfield signed a “Rule to Show” cause and made the notation, “Nunc pro Tunc” to July 26, 2017. This did not cure the defect on the order and therefore, the order was not valid and was not properly served or filed. There was no “caution”, “restraint”, or, “discretion” in the procedures employed in this matter and no other criminal proceeding could have been initiated in the way Judge William Altfield initiated these proceedings.

While the Petitioner appeared on August 15, 2017, he did not do so under any lawful legal authority, and as previously stated, the rule did not inform him of the charges or that he was facing criminal penalties. Judge William Altfield held the Petitioner against his will by threatening,

intimidating, and bullying him with six Miami-Dade Police Officers standing in front of the exit doors.

Court audio and transcripts were pulled from the August 15, 2017 hearing and reflected when the Petitioner addressed Judge William Altfield, he did so in a calm and quiet manner just before he was removed. The record reflects that the Petitioner's conduct was not the type of loud, aggressive, disruptive conduct for which courts have been upheld in their decisions to remove defendants or find them in direct criminal contempt. Court Audio {August 15, 2017 2:28:49- 2:29:00} reflect Judge William Altfield allegedly finding Defendant in Criminal contempt based on the below transcriptions;

**Judge Altfield:** I need you first of all to not talk back to me, that is number one. And secondly I need you to be quiet while we present this..uh..case. You know how to make

an objection. You made objections during your trial. You know what goes on during a hearing.

**Mr. Patterson:** You just said this is not a trial.

**Judge Altfield:** That's it. That's it. Take him out. You are found in contempt of court sir. My patience has been stressed to the limit.

Although without authority, Judge William Altfield held the Petitioner without bond and detained him for the alleged Contempt. Judge William Altfield failed to properly submit the paperwork evidencing his findings and the grounds for his purported 90-day sentence. When a Correctional Officer raised the issue at a later court hearing, Judge William Altfield claimed that the paperwork was submitted, however, it must have gotten "lost." On [8/15/17 3:19:43- 3:22:04] a

Correctional Officer advised Judge William Altfield that he needed a findings of fact, or, commitment order immediately, so that the Petitioner can be booked, or, he had to defer sentence and advise the Petitioner that he was not sentenced. Judge William Altfield replied, [3:22:33] "Well, I have a separate proceeding where he can be sentenced." Judge William Altfield agreed that it erred with the sentencing and issued a bond for the Petitioner.

The audio record of the Court's proceeding clearly evidences Judge William Altfield's bias toward the Petitioner. [8/15/17 2:07:59- 2:08:03]

**Judge Altfield:** Are you, are you leaving? If, if you're leaving, I'm gonna make sure that you're not gonna be leaving, okay?" Repeatedly, Judge William Altfield made clear his desire to illegally hold the Petitioner against his will.

On August 28, 2017, during the sidebar discussion, Judge William Altfield made the following statement, "He's going to go in for the Direct Criminal Contempt."

Upon the Petitioner requesting information from Judge William Altfield on why would he still be required to return to court for a case he had already been acquitted of, Judge William Altfield pressed the panic button under his bench and advised the Petitioner that he was being held in Contempt of Court. The Petitioner can be heard on audio recordings asking his mother to call the police before being tackled to the ground by Miami-Dade Police Officers.

On December 27, 2018, Judge William Altfield, upon placing an Order to Transport with the instructions, "By any means necessary", the Petitioner was maced, pepper sprayed, and

physically and forcefully transported to the Lawson E. Thomas Courthouse Center, where Judge William Altfield advised the Petitioner that he was sentencing him to 120 days for Direct Criminal Contempt. The sentencing is invalid because;

- a.) Petitioner's alleged misconduct did not disturb the Court's business or threaten demoralization of its authority.
- b.) Judge William Altfield was so personally embroiled and interested in the controversy that he should not have decided the contempt issue.
- c.) Judge William Altfield purportedly sentenced the Petitioner based on invalid

Case B-15-034548, which has  
a final disposition of Not  
Guilty issued on July 27,  
2017.

Case # F-17-016392 is purported pursuant to  
the Florida Jurisprudence 2d 1151, 1153, 1163, 1164,  
and 1165, and Florida Statute 28.222, which  
constitutes malicious prosecution against the  
Petitioner.

On August 15, 2017, after reporting to a Rule  
to Show Cause presided over by Judge William  
Altfeld, the Petitioner was arrested after being  
attacked by Miami-Dade Police Officers for allegedly  
resisting arrest. Court audio did not capture the  
Petitioner resisting arrest, or, any Officers  
requesting assistance, or, asking the Petitioner to  
stop resisting. {Court audio 02:12:05-2:29:12}.

Thereafter, the Petitioner was purportedly charged

with 1 count of battery on a Leo and 6 counts of resisting arrest without violence.

On August 23, 3017, bond was posted for the Petitioner in relation to Case F-17-016392. Eager to clear his name, the Petitioner filed a Notice of Self-Representation and Appearance on August 29, 2017, pursuant to 28 U.S.C. § 1654.

On August 30, 2017, and October 10, 2017, pursuant to the Sixth Amendment a “Demand for Speedy Trial” was by the Petitioner for Case F-17-016392.

On September 1, 2017, the Petitioner’s Demand for a Speedy Trial was struck because the Court did not have a valid and properly executed Filing of Information, which in turn, violated the Petitioner’s Fifth Amendment Rights. Nevertheless, invocation of the right need not always await indictment, information, or other formal charge but

can begin with the actual restraints imposed by arrest if those restraints precede the formal preferring of charges.

No order was ever presented or served to the Petitioner for the Strike. The trial court's failure to hold the calendar call did not toll the running of any time periods under this rule.

On September 9, 2017, the Petitioner, yet again, filed a notice of self-representation pursuant to 28 U.S.C. § 1654.

On September 15, 2017, the Petitioner appeared before Judge Milton Hirsch and was advised that although he was wanting to act as a *Pro Se* he would not be heard until he hired private counsel.

On September 25, 2017, the Petitioner appeared in Court in front of Judge Milton Hirsch and Judge Hirsch questioned yet again as to where

was the Petitioner's attorney. The Petitioner yet again advised the court that he had just represented himself in invalid Case B-15-034548 and was more than capable to represent himself yet again as a Pro Se. Judge Hirsh yet again advised the Petitioner that he would not hear his case without an attorney and that the Petitioner was required to return with an attorney on September 27, 2017.

On September 27, 2017, the Petitioner once again, as ordered, appeared before Judge Hirsch and once again, was denied to be seen since he had not retained private counsel. Judge Milton Hirsch then verbally advised the Petitioner on record that he wanted the Petitioner to take a psychological exam. Judge Milton Hirsch then ordered the Petitioner to return to Court on October 11, 2017 with an attorney.

On October 10, 2017, the Petitioner, following the order of Judge Milton Hirsch although knowing it was violating his rights, retained counsel.

On October 10, 2017, the Petitioner yet again demanded discovery and a copy of the Filing of Information.

On October 11, 2017, the Petitioner filed another “Demand for Speedy Trial”.

On October 11, 2017, the Court Docket reflected a Demand for Speedy Trial set for October 12, 2017 at 0900.

On October 11, 2017, Judge Milton Hirsch recused himself due to being friends with Judge William Altfield, and while allegedly transferring Case F-17-016392 to Judge Oscar Rodriguez-Fonts, Judge Hirsch informed the Petitioner that when he reports on Thursday, October 12, 2017, Judge Rodriguez-Fonts will be the new presiding Judge.

The Petitioner appeared prepared for trial on October 12, 2017 before Judge Oscar Rodriguez. Fonts, and once again, no trial occurred.

Case F-17-016392 should have been called for a Calendar Call on September 6, 2017, and should have been brought to trial before the Case expired on **October 18, 2017**. Neither occurred. The State elected to take no action in Case F-17-016392.

Since Case F-17-016392 expired pursuant to the Speedy Trial Rule, On October 27, 2017, the Petitioner withdrew his private counsel that was ordered by Judge Milton Hirsch. (Please note that the Petitioner consistently demanded a speedy trial and reported in front of Judge Milton Hirsch on multiple occasions and stated on record his request for a speedy trial).

On May 7, 2018, the Petitioner was arrested by U.S. Marshalls under a directive based on an unexecuted warrant in Case F-17-016392.

On May 11, 2018, in the clear absence of jurisdiction, Judge Oscar Rodriguez-Fonts refused to hear the motion on setting aside the Alias Capias warrant but rather elected to set a bond in the amount of \$133,000.00, ordered on record for the Petitioner to return on August 9, 2018 and August 20, 2018, in addition to ordering the Petitioner to surrender his passport.

On June 18, 2018, The Petitioner filed a Federal Lawsuit in the Middle District of Florida naming Judge Oscar Rodriguez-Fonts as a Defendant for violating his Civil Rights. (See Case 6:18-CV-950-CEM-GJK)

On June 20, 2018, two days after the filing of the Federal Lawsuit naming Judge Oscar Rodriguez-

Fonts, a purported Alias Capias was entered into the Criminal Justice Information System and onto the Miami-Dade County Clerk of Court's Website as retaliation.

On June 23, 2018, the Petitioner filed a Motion to Withdraw the Alias Capias (Filing #7409866) and a Motion to Discharge (Filing #7400988)

On June 25, 2018, Judge Rodriguez-Fonts pulled the original audio recording of the court hearing on May 11, 2018 from 0950-1031, which further confirmed that Judge Rodriguez-Fonts never ordered the Petitioner to Court prior to August 9, 2018 and August 20, 2018. In the clear absence of jurisdiction, rather than set aside his Alias Capias or Discharge the Case pursuant to the law, Judge Rodriguez Fonts took no action with either the

Motion to Withdraw Capias or the Motion to Discharge.

On October 23, 2018, the Petitioner noticed an Orange County Florida Sheriff's Police vehicle following him as he was exiting off of the 408 Expressway.

The Petitioner then proceeds to turn into the RaceTrac gas station. The Petitioner then proceeds to exit his vehicle to pump gas and notices two more police vehicles entering into the RaceTrac gas station. After pumping the gas, The Petitioner reentered his vehicle and without probable cause, three Orange County Florida Police Department vehicles, hereinafter (OCPD) and one Ocoee Police Department vehicle, hereinafter (OPD) and began circling The Petitioner's vehicle, and at that time, he told his Mother to call 911/the Sheriff's Office because numerous Officers were surrounding him.

Immediately after, one OCPD Officer pulled in front of the Petitioner's vehicle. The OCPD Officer in front of the Petitioner's vehicle, later identified as Johnathan Reeves, exits his vehicle with his revolver drawn. The OCPD Officer in the back of the Petitioner's vehicle, later to be identified as Terris Winburn, exits his vehicle with his revolver drawn. Officer Jonathan Reeves proceeded to tell the Petitioner to get out of the vehicle and to get off the phone, which at that time, the OPD Officer exited his vehicle and proceeded to place handcuffs on the Petitioner and guided him to the back seat of an OCPD Officer's vehicle. At this point and time, six additional OCPD Officers pulled in, and immediately thereafter, they began to illegally search the Petitioner's vehicle, without stating their purpose, or, legally identifying the Petitioner as their suspect, proving this to be an illegal ambush.

Then Officer Terris Winburn proceeds to transport the Petitioner to the OCDC, after the Petitioner made several demands to see the official warrant, which Terris Winburn never produced. OCDC proceeded to once again illegally receive the Petitioner without a valid warrant. The Petitioner was booked in the Orange County Jail on October 23, 2018 at 1825.

On October 24, 2018, at an Orange County Jail Bond Hearing, Judge Jeanette Bigney, who is currently a Defendant in a Federal Suit {Patterson v. Orange County Florida Case 6:18-CV-950-CEM-GJK}, proceeded to retaliate against the Petitioner, stating that the non-existent warrant is valid even though it does not contain a signature of the issuing judge, and then stated that the Petitioner will be detained at the Orange County Jail until Miami-Dade County picks him up. The Petitioner made

several requests on record to inspect the warrant, and Judge Bigney denied him of that right.

After a Writ of Habeas Corpus was filed in the Ninth Judicial Circuit Court of Florida on October 29, 2018, and Ms. Thabet advising Officer Arthur Willis, the Risk Management Analyst for Orange County Corrections of the warrant defects, which he had provided to her as a way to justify the detainment of the Petitioner, the Petitioner was immediately transferred to Miami-Dade County on Wednesday morning, October 31, 2018.

On Thursday, November 1, 2018, the Petitioner appeared at a non-docketed court hearing at 1035 before Judge Rodriguez-Fonts. Judge Rodriguez-Fonts asked the Petitioner where was his legal counsel. The Petitioner asked why would he need an attorney for an expired case? Judge Rodriguez-Fonts stated, "I do not want to talk about

details of the case". The Petitioner then continued to advise Judge Rodriguez-Fonts that he could not be impartial as he was already named as a Defendant in a Federal Suit that the Petitioner had filed, along with the filing of a Habeas Corpus, as well as stating on record that Case F-17-061392 was discharged. In addition, the Petitioner stated that Judge Rodriguez-Fonts was violating his Civil Rights. Judge Rodriguez-Fonts again stated, "He was not going to discuss details but wanted to know if the Petitioner would get an attorney." The Petitioner then continued by citing the Florida Rules of Criminal Procedure as it applied to the speedy trial rule, as well as citing the Florida Rules of Judicial Procedure as it pertained to valid warrants of arrest and filings of information. The Petitioner also advised Judge Rodriguez-Fonts that what he was doing by knowingly attempting to continue a trial on expired

Case F-17-016392, is not only perceived, but evident retaliation for the filing of the Federal Law Suit. Judge Rodriguez-Fonts then had a side bar in which he did not entitle the Petitioner, Pro-Se, to participate in. The Petitioner inquired as to how he would still be remanded, or, how the Court could continue setting additional court dates, when Case F-17-016392 was discharged. The Judge called for a recess and dismissed Petitioner.

At 1353 on November 1, 2018, the Habeas Corpus was completed and filed in the Eleventh Judicial Circuit Court of Florida.

At 1355 on November 1, 2018, Kathy Thabet personally served a filed Habeas Corpus to Judge Rodriguez-Fonts via hand delivery in his chambers.

At 1546 on November 1, 2018, Kathy Thabet personally served a filed copy of the Habeas Corpus

to Sergeant Conner of the Turner Guilford Knight  
Correctional Center.

At 1630 on November 1, 2018, the Court  
Docket for Case F-17-016392 (Sequence 114)  
reflected a Report for Ferrata Hearing set for  
11/05/2018.

At 1630 on November 1, 2018, the Court  
Docket for Case F-17-016392 (Sequence 115) stated  
report re: Pleas set for 11/05/2018 at 0900.

At 1630 on November 1, 2018, the Court  
Docket for Case F-17-016392 (Sequence 116) stated  
Felony sounding set for 01/09/2019 at 0900.

At 1630 on November 1, 2018, the Court  
Docket for Case F-17-016392 (Sequence 117) stated  
Trial hearing scheduled for 01/14/2019 at 0900.

At 1630 on November 1, 2018, the Court  
Docket for Case F-17-016392 (Sequence 118) stated  
Current Bond Status Def Held No Bond.

At 1630 on November 1, 2018, the Court  
Docket for Case F-17-016392 (Sequence 119) stated  
USS AMT/ 30000 REVOKED 11/01/2018.

At 1630 on November 1, 2018, the Court  
Docket for Case F-17-016392 (Sequence 120) stated  
USS AMT/150000 REVOKED 11/01/2018.

The above Docket entries were entered after  
Judge Rodriguez-Fonts was served with the Habeas  
Corpus, but also, the mere fact that Judge  
Rodriguez-Fonts is a named Defendant in a Federal  
Civil Rights Violation Lawsuit filed by the Petitioner,  
reflects clear bias and qualifies for immediate  
disqualification.

Judge Rodriguez-Fonts also had an obligation  
to recuse himself and refrain from hearing the  
Habeas Corpus.

Judge Rodriguez-Fonts should have recused  
himself for multiple reasons; a clear bias; a clear

inability to be impartial and a pending federal lawsuit for violation of Petitioner's civil rights, and being in the clear absence of jurisdiction.

On November at 09:47:50, the Petitioner was called before Judge Oscar Rodriguez-Fonts and at that hearing Judge Rodriguez-Fonts stated "Case F-17-016392; *State v. Dimitri*; Court is entering a denial for both of Defense's Motions, one for Habeas Corpus. Judge Rodriguez-Fonts did not state the other Motion on record, and the court is also ordering a psychological evaluation for Mr. Patterson."

Please note that at no time did the Petitioner evidence psychological issues. The Petitioner has never been treated or diagnosed with psychological issues. The Petitioner is fully competent of the proceedings. Ordering a psychological examination was Judge Rodriguez-Fonts attempting to again

intimidate and undermine not only the Judicial process, but the Petitioner and his Civil Liberties.

“When the Petitioner asked on what was the basis for Judge Rodriguez-Fonts denying the Writ of Habeas Corpus, Judge Rodriguez-Fonts refused to answer. The Petitioner then asked Judge Rodriguez-Fonts to hear the Motion to Discharge that he has filed multiple times along with the Motion to Disqualify and Judge Rodriguez-Fonts refused.

When the Petitioner asked on what basis was his denial of Habeas Corpus, Judge Rodriguez-Fonts refused to answer. The Petitioner asked the judge to hear the Motion to Discharge that he has filed multiple times along with the Motion to Disqualify and Judge Rodriguez-Fonts refused.

Upon the multiple acts of injustice and misconduct with Judge Rodriguez-Fonts, the Petitioner filed a Habeas Corpus and Writ of

Mandamus and Prohibition with the Third District Court of Appeals. Upon the filing of said petition(s), Judge Rodriguez-Fonts ultimately called the Petitioner's formerly retained counsel, (Barry Witlin) from a year prior and advised him that he was placing him back on the case and was denying his "Motion to Withdraw" filed a year prior. This was done in an attempt to undermine Petitioner's appeal process and rights provided under the United States Constitution.

Upon the Third District Court of Appeals dismissal of the Petitions citing *Logan v. State*, the Petitioner filed a Writ of Certiorari. Upon the filing of the Writ of Certiorari, Judge Rodriguez-Fonts, in violation of multiple cannons, backdated a denial of the Habeas Corpus.

#### **GROUND FOR HABEUS CORPUS RELIEF**

By Petitioner's Petition for a Writ of Habeas Corpus, Dimitri Jonthiel Patterson asserts the fact of being unlawfully detained pursuant to the Fourth Amendment and based on an invalid and purported warrant, and an abandoned case where his 4<sup>th</sup>, 5<sup>th</sup>, 13<sup>th</sup>, and 14<sup>th</sup> Amendment Rights are being violated.

#### **REASONS FOR GRANTING THE WRIT**

A petition seeking a writ of habeas corpus shall comply with the requirements of 28 U. S. C. §§ 2241 and 2242, and in particular with the provision in the last paragraph of §2242, which requires a statement of the "reasons for not making application to the district court of the district in which the applicant is held."

To justify the granting of a writ of habeas corpus, the petitioner must show that exceptional circumstances warrant the exercise of the Court's discretionary powers, and that adequate relief cannot

be obtained in any other form or from any other court. (Rule 20.4(a), Rules of the U.S. Supreme Court)

Although courts have not “confined themselves to an arbitrary and technical definition of ‘jurisdiction,’ ” Will v. United States, 389 U.S. 90, 95, 88 S. Ct. 269, 19 L.Ed.2d 305 (1967), “only exceptional circumstances amounting to a judicial ‘usurpation of power,’ ” *ibid.*, or a “clear abuse of discretion,” Bankers Life & Casualty Co. v. Holland, 346 U.S. 379, 383, 74 S. Ct. 145, 98 L. Ed. 106 (1953), “will justify the invocation of this extraordinary remedy,” Will, 389 U.S., at 95, 88 S. Ct. 269, 542 U.S. 367, 380 (2004).

This case presents exceptionally rare circumstances that warrant this courts original Habeas jurisdiction.

The Petitioner has been maliciously prosecuted, unlawfully arrested, and is currently illegally detained, which is in direct violation of the United States Constitution.

The Petitioner is being unlawfully detained by a Lower Tribunal Court in a municipal county jail whose in the clear absence of jurisdiction, and has asserted facts in this Petition that cannot be disputed with evidence from the Respondent, and therefore, he is entitled to immediate release.

Wales v. Whitney, 114 U. S. 564, 574 (1885) (emphasis added); see also Braden v. 30th Judicial Circuit Court of Ky., 410 U. S. 484, 494-495 (1973); Ex Parte Grossman, 267 U.S. 87 (1925); Ex Parte Hudgings, 249 U.S. 378 (1919); Matter of Heff, 197 U.S. 488 (1905)

The U.S. Supreme Court has the power to discharge a detainee who is in custody in violation of the United States Constitution. 28 U.S.C. 2241(c)(3).

The great writ of habeas corpus ad subjiciendum, is among the most precious safeguards of personal liberty. The right to a writ of habeas corpus is guaranteed by 28 U.S.C. § 2241.

The proper grounds for jurisdiction for a writ of habeas corpus are found in 28 U.S.C. § 2241.

The Petitioner cites a "miscarriage of justice" element to this Habeas Corpus. Petitioner has reflected by the above that he is currently unlawfully detained in violation of the Constitution.

Here the Petitioner has not obtained adequate relief in any form or in any other Court due to a usurpation of justice by the Eleventh Judicial Circuit in and for Miami-Dade County, Third District Court of Appeals of Florida, and the Supreme Court of

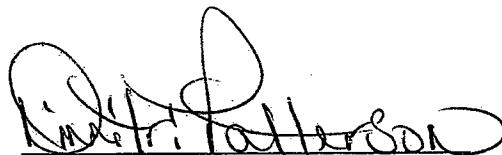
Florida, abuse of discretion by the United States Court Southern District of Florida, and the U.S. Court of Appeals for the Eleventh Circuit. (Also See **Dimitri Patterson v. Miami-Dade Corrections and Rehabilitation**, Case Number 19-10721, and **Dimitri Patterson v. Miami-Dade County, et al.**, Case Number 19-10226-HH).

Secondly, the Petitioner has clearly protected rights guaranteed to him by the U.S. Constitution in which he has been deprived through malicious prosecution, unlawful arrests, and unlawful detainment. Lastly, the issuance of a Writ of Habeas Corpus by this Court is appropriate because it protects the constitutional rights of the Petitioner, and safeguards the public's interests.

#### **CONCLUSION AND RELIEF SOUGHT**

For all the reasons discussed herein, Dimitri Jonthiel Patterson respectfully urges this Honorable

Court to grant Habeas Corpus relief under 28 U.S.C.  
§2241, by ordering the Miami-Dade County  
Corrections and Rehabilitation Department to  
immediately release the Petitioner on his own  
recognition. Therefore, the Petitioner prays that  
this Honorable Court will grant Habeas Corpus relief  
under 28 U.S.C. 2241.



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## VERIFICATION

Pursuant to 28 U.S.C. § 1746, I, Dimitri Patterson, declare as follows:

1. I am the Petitioner for the above Petition for Writ of Habeas Corpus, a citizen of the United States of America, and a resident of Florida.
2. I have personal knowledge of the factual statements set forth in the foregoing Petition for Writ of Habeas Corpus, and if called on to testify I would competently testify as to the matters stated herein.
3. I verify under penalty of perjury under the laws of the United States of America, that the factual statements in this Petition concerning myself, and the actions of the State Officers named in this Petition, are true and correct.

Executed on September 16, 2019



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