

No. 19-6776

IN THE  
SUPREME COURT OF THE UNITED STATES

**ORIGINAL**

WILLIAM DAWSON — PETITIONER  
(Your Name)

vs.

BRYAN K. KIELLS — RESPONDENT(S)

Supreme Court, U.S.  
FILED  
NOV 26 2019  
OFFICE OF THE CLERK

ON PETITION FOR A WRIT OF CERTIORARI TO

U.S. COURT OF APPEALS FOR FOURTH CIRCUIT  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

WILLIAM DAWSON  
(Your Name)

P.O. BOX 1058  
(Address)

REEDS VILLE N.C. 28425  
(City, State, Zip Code)

(Phone Number)

QUESTION(S) PRESENTED

IF INVESTIGATOR INTENTIONALLY INVESTIGATES LOCATION WHERE FLEEING VICTIM COLLAPSES AND DIES AS CRIME SCENE, INSTEAD OF AREA WHERE VICTIM WAS SHOT, IS THE INVESTIGATOR GUILTY OF MIS-CONDUCT?

IF PETITIONER SECURES INVESTIGATION OF DETECTIVE THAT IN BAD FAITH, INVESTIGATES LOCATION WHERE FLEEING MURDER VICTIM COLLAPSES AND DIES, AS CRIME SCENE, INSTEAD OF LOCATION WHERE VICTIM WAS SHOT, IS PETITIONER ENTITLED TO REMAND OF CASE, WITH INSTRUCTIONS, FOR DISTRICT COURT TO REDUCE HIS OR HER SENTENCE TO TIME SERVED, FOR VOLUNTARY MANSLAUGHTER AND IMMEDIATE RELEASE?

## **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:

N.C. ATTORNEY GENERAL JOSHUA STEIN P.O. BOX 629  
RALEIGH N.C. 27602.

## **RELATED CASES**

DANISON V. HICKS ET. AL 5:19-CT-3291-BD

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### STATUTES AND RULES

F. R. CRM. R. RULE. 35(B)

### OTHER

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 B 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 is unpublished.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 A 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 is unpublished.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 \_\_\_\_\_ 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 OCT. 18, 2019.

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 \_\_\_\_\_.  
The jurisdiction of this Court is invoked under 28 U. S. C. § 1257(a).

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

18 U.S.C. § 3553. RULE 35 OF THE FEDERAL RULES OF CRIMINAL PROCEDURE PERMITS A DISTRICT COURT TO REDUCE A SENTENCE TO REFLECT THE DEFENDANT'S SUBSEQUENT SUBSTANTIAL ASSISTANCE IN THE INVESTIGATION OR PROSECUTION OF ANOTHER CRIMINAL.

BRADY V. MARYLAND

STATEMENT OF THE CASE

DETECTIVE HICKS IN BAD FAITH, INVESTIGATED LOCATION WHERE FLEEING MURDER VICTIM COLLAPSED AND DIED AS THE CRIME SCENE, TO UNLAWFULLY EX-CLUDE SHOVEL-KNIFE ON, CONTAINING VICTIM'S PRINTS ON HANDLE, FROM TRIAL, IN VIOLATION OF BRADY.

PETITIONER SECURED <sup>SS</sup>1983 INVESTIGATION OF CRAVEN COUNTY SHERIFF DETECTIVE RAY FREEMAN ABOVE DESCRIBED INVESTIGATORY MISCONDUCT, ENTITLING HIM TO SENTENCE REDUCTION REWARD, PURSUANT TO F. R. CRIM. P. RULE. 35(B).

REASONS FOR GRANTING THE PETITION

NO REASONABLE JURY WOULD HAVE PETITIONER GUILTY BEYOND REASONABLE DOUBT ABSENT EXONERATORY EVIDENCE EXCLUSION, IN VIOLATION OF BRADY.

## **CONCLUSION**

The petition for a writ of certiorari should be granted.

Respectfully submitted,

X William Dawson

Date: Nov. 19, 2019