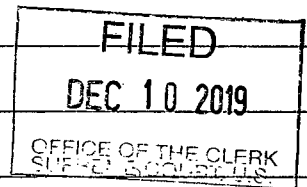


19-7703

ORIGINAL

IN THE UNITED STATES
Supreme Court



TERRY ANTONIO LEE

V. CASE NO. 19 A 539

WENDY KELLEY, Director

ARKANSAS DEPARTMENT OF CORRECTION

ON PETITION FOR A WRIT OF
CERTIORARI -

EIGHT CIRCUIT COURT OF APPEAL
NAME OF COURT THAT LAST RELIED
ON MERITS OF MY CASE

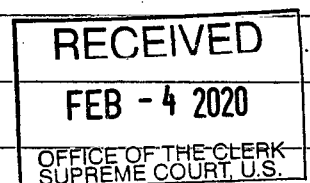
PETITION FOR WRIT OF CERTIORARI

TERRY LEE 120960

E.A.R.U.

P.O. Box 970

MARIANNA ARK 72360



QUESTIONS PRESENTED

- (1) DOES 4TH AMENDMENT Release From illegal detention
- (2) IS PETITIONER CONVICTED AGAINST DOUBLE Jeopardy 5TH AMENDMENT
- (3) WAS COUNSEL INEFFECTIVE IN VIOLATION OF 6TH AMEND.
- (4) IS SENTENCE AND CONVICTION VOID
- (5) DID TRIAL COURT HAVE SUBJECT MATTER JURISDICTION
- (6) IS THE COMMITMENT ORDER AND JUDGMENT OF CONVICTION INVALID
- (7) DID PROSECUTOR VIOLATE A BRADY VIOLATION
- (8) DID THE JURY INSTRUCTION FORMS VIOLATE DUE PROCESS 14TH AMENDMENT
- (9) DID THE TRIAL JUDGE ABUSE ITS DISCRETION ON NOT INSTRUCTING JURORS
- (10) DOES A ENHANCE SENTENCE VIOLATE 8TH AMENDMENT
- (11) ^{WAS} ~~IS~~ IT INSUFFICIENT EVIDENCE VIOLATE 14TH AMENDMENT
- (12) DOES A TWO HOUR INTERVIEW STATING COMPETENCY CAUSE REVERSIBLE ERROR
- (13) IS IT A VIOLATION OF DUE PROCESS 14TH AMEND A PERSON CANNOT BE CONVICTED ON MISINFORMATION OR UNTRUE MATERIAL
- (14) DOES IT VIOLATE DUE PROCESS 14TH AMENDMENT IF A CASE ASSIGN TO A JUDGE AND A COURT ROOM AND JUDGE STATE HE WAS GOING RECUSE BUT NEVER Reduce it in WRITTEN NOTIFYING THE ~~CLERK~~ CLERK AND SOME HOW OFF RECORD CASE GO TO ANOTHER COURT ROOM.
- (15) WAS DUE PROCESS 14TH AMENDMENT VIOLATED ON ~~INCOMPETENCY~~ INCOMPETENCY

3. List of Parties (1) All Parties
APPEAR IN THE CAPTION OF THE CASE

1. Judge J. Hamilton Municipal Court
2. Judge Herbert Wright Circuit Court
3. Judge Barry A Sims Circuit Court
4. THE ARKANSAS COURT OF APPEALS
5. THE ARKANSAS SUPREME COURT
6. Magistrate Judge Judge Deere
7. THE UNITED STATE DISTRICT COURT
Judge Kristine G. Baker
8. THE UNITED STATE COURT OF APPEALS
EIGHTH CIRCUIT.

TABLE OF CONTENTS

1. Questions presented.
2. List of parties (1) All parties appear in the caption of the case.
3. Table of Authorities
4. For Jurisdiction in Court
5. Statement of Case
6. Appendices
7. Reason for granting Petition

TABLE OF AUTHORITIES

STRICKLAND V. WASHINGTON, 466 U.S. 668 (1984)
 RIVERG V. STATE, 350 Ark. 198, 85 S.W. 3d 896 (2002)
 MCQUEEN V. SWENSON 498 F. 2d 207 (8TH Cir 1974)
 LOVD V. WOOD or LORD V. WOOD 184 F. 3d 1083
 (8TH Cir 1974)
 MADDOX V. LORD 818 F. 2d 1058 (2nd Cir 1987)
 WILLIAM V. WASHINGTON 59 F. 3d 673 (7TH Cir 1995)
 SOFFAR V. DRETKE, 368 F. 3d 941, 473 (5TH Cir 200)
 ELDRIDGE V. ATKINS 665 F. 2d ~~228~~ 228 (8TH Cir 1981)
 U.S. V. PUGLIESE 805 F. 2d 1117, 1123 (2nd Cir 1986)
 U.S. V. GRAY 878 F. 2d 702 (3rd Cir 1989)
 CALIFORNIA V. Trumbetta 467 U.S. 479 (1984)
 JOHNSON V. MORRIS 999 F. SUPP 1256 E.D. Ark (1998)
 POWELL V. ALABAMA 287 U.S. At 68-69- 53 S.Ct At 63-64
 NEIL V. JAMES 811 F. 2d 100 (2nd Cir 1987)
 U.S. V. MATES 905 F. 2d 30 (2nd Cir 1990)
 LVONS V. MCCATER 770 F. 2d 529 (5TH Cir 1985)
 BRADY V. MARYLAND 373 U.S. 83, 87 (1963)
 CULER V. SULLIVAN SUPRA 446 U.S. At 346, 90. S.Ct
 At 1717
 TELEDG V. DUBOIS 142 F. 3d 18 (1ST Cir 1998)
 U.S. V. MARTINEZ - SALAZER U.S. Ariz (2000)
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 F. 2d 59 (3rd Cir 1989)
 TACKETT V. STATE, 284 Ark 211, 680
 MU-MIA V. VIRGINIA 500 U.S. — 114 L.Ed

T.O.A. 1

2d 493, 111 S. Ct 1991

Smith v. Gearing 888 F. 2d 1334 (11th Cir 1990)

William v. State 338 Ark 178, 183, 992 S.W
2d 89, 931 (1999)

Ben v. State 371, Ark 375, 381 266 S.W 3d
696, 701 (2007)

Rounsaville v. State 374 Ark. 359, 288 S.W 3d
213, 216 (2008)

Baughman v. State, 353 Ark. 1, S. 110 S.W 3d 740, 743
(2003)

Jackson v. Virginia 443 U.S. 307, 317 (1978)

Johnson v. State 270, Ark. 992, 606 S.W, 2d
752 (1980)

MEEKS v. State, 55 Ark, App. 220, 936 S.W 2d
555 (1996)

STIPES v. STATE Ark 719, 870 S.W 2d 388 (1994)

Green v. State, 310 Ark 16. 14. 832 S.W 2d 494
496 (1992)

Brown v. State 74 Ark. App. 281, 297, 47 S.W 3d
314 (2001)

Flower v. Larry Norris Director Arkansas Depart
ment of Correction 347 Ark. 760. 68 S.W 3d
289 (2002)

MURPHY v. Puckett 893 F. 2d 94 (8th Cir 1990)

JACKSON v. LEONARD 162 F. 3d 81 (2nd Cir 1998)

THOMAS v. LOCK HART 738 304 (8th Cir 1984)

Reed v. State 375 Ark. 277, 279, 289 S.W, 3d 921, 923

T.O. A. 2

Pate v. Roberston 383 U.S. 375, 86, S.Ct

836, 15, L.Ed 2d, 815 (1966)

LEE DUANE JACOBS v. State, Ark. 87-88

(1988) Appellant

Constitutional And Statutory Provision
Involved:

Ark. Code ANN 7.1

A.R.C.P. 17.3

Ark. Code ANN 8.1

A.R.C.P. 19.1

Ark. Code ANN. 40.1

A.R.C.P. 19.2.

Ark. Code ANN. 5-1-110

A.R.C.P. 19.6

Ark. Code ANN. 5-2-302

Ark. Const, Art 2 § 8

Ark. Code ANN. 5-2-305

U.S. Const 4TH Amendment

Ark. Code ANN. 5-2-309

U.S. Const 5TH Amendment

Ark. Code ANN. 5-4-403

U.S. Const. 6TH Amendment

Ark. Code ANN. 5-4-618

U.S. Const 8TH Amendment

Ark. Code ANN. 5-13-201

U.S. Const 14TH Amendment

Ark. Code ANN. 5-13-204

A.E.D.P.A. 28 U.S.C 2254

Ark. Code ANN. 5-13-310

A.E.D.P.A. 28 U.S.C 2254(d)

Ark. Code ANN. 5-13-310 (9)(2)

Ark. Code ANN. 12-27-113

Jury Instructions:

Ark. Code ANN. 16-112-103

Amci 2d 9318

Ark. Stat ANN. 41-605 (3)

NO. 19 Amci 2d 8301-vf

Ark. Stat ANN. 41-606

NO. 8 Amci 2d 9312-vf

Admin order 2

NO. 21 Amci 2d 8301-vf

Admin order 14

NO. 25 Amci 2d 8301-vf

Admin order 16

NO. 27 Amci 2d 8301-vf

A.R.C.P. ~~17.1~~ 17.1

NO. 11 Amci 2d 9312-vf

T.O.A. 3

NO. 12 Amci 2d 9312

NO. 13 2d 9312-vf

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 judgement below. 1. For cases
from Federal Courts: the opinion
of the united states court of
appeals appears at AT Appendix 29
to the petition and is [1] report at
_____ or [2] has been designated for
publication but is yet reported, or
[3] is unpublished

2. For case from state court: for
case from the ARKANSAS supreme
court appears at Appendix 13 to
the petition and is [1] report at _____
or [2] has been designated for
publication but yet reported or
[3] is unpublished

Jurisdiction ~~for~~

For cases from Federal Courts: the
date on which the united states
court of appeals decided my case
was August 16, 2019. No petition
for rehearing was timely file in my
J. O. S. 1

CASE, AN EXTENSION OF TIME TO FILE
THE PETITION FOR A WRIT OF CERTIORARI
WAS GRANTED TO AND INCLUDING
DEC. 16, 2019 AND THAW 60 MORE DAYS DATE
IN APPLICATION NO. 19A539

THE JURISDICTION OF THIS COURT IS
INVOLVED UNDER 28 U.S.C. 1254(1)
FOR CASES FROM STATE COURTS THE DATE
ON WHICH THE HIGHEST COURT
DECIDED MY CASE WAS NOV. 17 2017 A
COPY OF THAT DECISION APPEARS AT
APPENDIX 13 A TIMELY PETITION
FOR REHEARING WAS THERE AFTER DENIED
ON THE FOLLOWING DATE _____ AND A
COPY OF THE ORDER DENYING REHEARING
APPEARS AT APPENDIX _____

EXTENSION OF TIME DATE _____
THE JURISDICTION OF THIS COURT
IS INVOLVED UNDER 28, U.S.C.
1257 (a)

STATEMENT OF CASE

AFTER THE END OF THE STATE CASE LEE COUNSEL MOVE FOR A DIRECT VERDICT ON EACH INDIVIDUAL COUNT OF THE INFORMATION AND EACH MOTION WAS DENIED BY THE CIRCUIT COURT (AB 217-222) MR LEE ASK THAT THE JURY BE INSTRUCTED ON RECOMMENDATION OF WHETHER THE SENTENCE BE CONSECUTIVE OR CONCURRENT AND TENDERED AMCI 2D 9318-VF (AB 278, ADD 34) THE CIRCUIT COURT REFUSED THE INSTRUCTION ON THE GROUND THAT IT WAS HIS DECISION TO MAKE HE NEVER GAVE THE INSTRUCTION AND HE DID NOT CARE WHAT THE JURY RECOMMENDED (AB 297) THE JURY RETURN VERDICT 40 YEAR TERRORISTIC ACT (ADD 43) 30 YEARS ATTEMPT BATTERY IN FIRST DEGREE 4 15 YEAR SENTENCE FOR AGGRAVATED ASSAULT (ADD 44) A REPLACEMENT 15 YEARS (ADD 49) TOTAL 85 YEARS. NOTICE OF FILED FEBRUARY 15, 2012 (ADD, 28) ON MARCH 27, 2013 THE ARKANSAS COURT OF APPEALS AFFIRM MY CONVICTION ON THREE GROUNDS; (1) THE MOTION FOR DIRECT VERDICT SHOULD HAVE BEEN GRANTED BECAUSE STATE FAILED TO PROVE ESSENTIAL ELEMENT OF THE CHARGE OFFENSES (2) THE COURT ABUSE DISCRETION IN REFUSING WITHOUT REASON TO INSTRUCT THE JURY

S.O. C. 1

ON CURRENT AND CONSECUTIVE (3)
APPELLANT CANNOT BE CONVICTED OF TERRORISTIC
ACT AND AT THE SAME TIME BE CONVICTED
ATTEMPT BATTERY AND AGGRAVATED
ASSAULT WITHOUT OFFENDING DOUBLE JEOPARDY
ALSO LEE CONVICTION WAS AFFIRMED
A FALSE STATEMENT BY THE ARKANSAS
COURT OF APPEALS STATING LEE THREATENED
TO RETURN AND KILL EVERYBODY IN THE
HOUSE 'NO' SUPPORTED EVIDENCE NOWHERE OF
THIS STATEMENT. PETITIONER FILED A
POST-CONVICTION RELIEF RULE 37 MAY 9, 2013
AND SECOND PETITION JUNE 3, 2013, IN
PULASKI COUNTY 7TH DIVISION JUDGE
BARRY SIMS CASE NO. CR 2010-48

ARGUMENTS FILED (1) INEFFECTIVE ASSISTANCE
OF COUNSEL (2) AMENDMENT (3) DOUBLE JEOPARDY
(4) PROSECUTORIAL MISCONDUCT AND VIOLATION
OF DISCOVERY VIOLATION (5) IMPARTIAL TRIAL
(6) THE PSYCHOLOGIST TWO HOUR INTERVIEW
RESULTED IN A REPORT THAT PETITIONER
COMPETENCY RAISED A REASONABLE DOUBT IN
WAS REVERSAL ERROR, (7) LACK OF JURISDICTION
OVER SUBJECT MATTER (8) THE JUDGMENT OF
CONVICTION AND THE COMMITMENT ORDER
IS INVALID (9) PETITIONER DENIED DUE
PROCESS VIOLATED BY ILLEGAL ARREST WITHOUT

probable Cause 4th Amendment (9)

PETITIONER prior to sentencing the trial Court fail to AFFORD HIS right to Allocution AS PROVIDED IN ARK. STAT. ANN. 43-2303 REPI (1977)(10) THE JURY FORMS WAS INCONSISTANT VIOLATED PETITIONER CONSTITUTIONAL RIGHT. BOTH PETITIONS WAS DENIED IN THE ORDER APRIL 16, 2014 BY THE CIRCUIT JUDGE BARRY A SIMS (DOC. NO. 20) PETITIONER FILED NOTICE OF APPEAL IN PULASKI COUNTY TO CLERK MAY, 19, 2014 (DOC. NO. 20) THE COUNTY CLERK STATE NOTICE OF APPEAL WAS UNTIMELY PETITIONER FILED A BELATED APPEAL OCT 28 2014 THE ARKANSAS GRANTED JANUARY 22, 2015 ON APPEAL TO THE ARKANSAS SUPREME COURT PETITION CLAIM STATED THE SAME AS FILED IN CIRCUIT COURT ACCEPT ON THE DUE PROCESS 14th AMEND CLAIM ON THE ARKANSAS SUPREME COURT. THE ARKANSAS SUPREME COURT REMANDED THE CASE TO SETTLE THE RECORD AND FOR ADDITIONAL FINDINGS OF FACT PETITIONER FILE A MOTION FOR REVERSAL AND DISMISSAL STATE CIRCUIT COURT REFUSE TO RESPONSE TIMELY THE SUPREME COURT DENIED RE BRIEFS WAS FILE SUPREME

S.O. 2.3

Court denied claims Nov. 30, 2017
Petitioner Filed Federal Habeas Corpus
(Doc. No. 2) Motion for Evidentiary
Hearing was Filed (Doc. No. 22) After that,
~~not~~ A Recommended Disposition done
by the Magistrate Judge to the District
Court Judge Kristine G. Baker (Doc. No. 24)
Petitioner Filed objection to recommended
Disposition (Doc. No. 25) Another motion
for Evidentiary Hearing (Doc. No. ~~28~~ 29)
Petitioner sent letter to Eighth Circuit
Court of Appeals to get a rule from District
Court (Doc. No. 30) Judge Kristine G. Baker
order denied all claims (Doc. No. 33)
Judgment also (Doc. No. 34) The United
States Court of Appeal mandate (Doc. No. 37)
Application for Certificate of Appealability
(Doc. No. 38) Notice of Appeal (Doc. No. ⁴⁰~~39~~)
The United States District Judge Kristine
G. Baker order denying Certificate of
Appealability Again (Doc. No. 43) The
United States Court of Appeal sent to
the District Court a order to file
Records After Petitioner Filed
Writ of Certiorari (Doc. No. 45)
Petitioner sent documents to the United
States Clerk who stated file Writ of
Certiorari S.O.C. 4

APPENDICES

- (1) APPENDIX (DOC. NO. 2) HABEAS CORPUS
 - (2) APPENDIX (DOC. NO. 4) ORDER JUDGE RECUSE
 - (3) APPENDIX (DOC. NO. 6) MOTION TO PROCEED IN FORMA PAUPIS GRANTED
 - (4) APPENDIX (DOC. NO. 8) MOTION FOR APPOINTMENT OF COUNSEL
 - (5) APPENDIX (DOC. NO. 9) MOTION FOR APPOINTMENT OF COUNSEL
 - (6) APPENDIX (DOC. NO. 11) ORDER GRANTED EXTENDED TIME
 - (7) APPENDIX (DOC. NO. 14) VERIFICATION
 - (8) APPENDIX (DOC. NO. 15) DECLARATION IN SUPPORT OF MOTION TO PROCEED
 - (9) APPENDIX (DOC. NO. 16) MOTION FOR APPOINTMENT OF COUNSEL
 - (10) APPENDIX (DOC. NO. 17) MOTION FOR DISCOVERY
 - (11) APPENDIX (DOC. NO. 18) EXPLAINING THE VERIFICATION ON MOTIONS
 - (12) APPENDIX (DOC. NO. 19) ORDER CONTAINING TO DISCOVER MOTION
 - (13) APPENDIX (DOC. NO. 20) ORDERS OF COURT RULINGS, COURT PROCEEDINGS, APPELLANT ABSTRACT, PETITIONS OF POST CONVICTIONS RESPONSES FROM ARK. COURT OF APPEALS, ARK. SUPREME COURT ARGUMENTS ON BRIEFS, ATTORNEY GENERAL RESPONSES. ~~EXC.~~ DOCUMENTS OF EVIDENCE etc.
- APP. 1.

- (14.) APPENDIX (DOC. NO. 21) A LETTER
- (15.) APPENDIX (DOC. NO. 22) MOTION FOR EVIDENTARY HEARINGS
- (16.) APPENDIX (DOC. NO. 24) RECOMMENDED DISPOSITION
- (17.) APPENDIX (DOC. NO. 25) OBJECTION TO THE RECOMMENDED DISPOSITION
- (18.) APPENDIX (DOC. NO. 26) AFFIDAVIT WITH SUPPORTED DOCUMENTS
- (19.) APPENDIX (DOC. NO. 27) AFFIDAVIT WITH SUPPORTED DOCUMENTS
- (20.) APPENDIX (DOC. NO. 28) DOCUMENTS ADDED TO AFFIDAVITS AND OTHER EVIDENCE
- (21.) APPENDIX (DOC. NO. 29) MOTION FOR EVIDENTARY
- (22.) APPENDIX (DOC. NO. 30) ACKNOWLEDGE FROM UNITED STATE COURT OF APPEALS
- (23.) APPENDIX (DOC. NO. 31) LETTER WITH EVIDENCE
- (24.) APPENDIX (DOC. NO. 32) PROOF OF SUFFERING
- (25.) APPENDIX (DOC. NO. 33) ORDER DENYING RELIEF
- (26.) APPENDIX (DOC. NO. 34) JUDGEMENT
- (27.) APPENDIX (DOC. NO. 35) 1
- (28.) APPENDIX (DOC. NO. 36) JUDGEMENT
- (29.) APPENDIX (DOC. NO. 37) MANDATE
- (30.) APPENDIX (DOC. NO. 38) C. O. A.
- (31.) APPENDIX (DOC. NO. 39) FORMS PROPRIIS
- (32.) APPENDIX (DOC. NO. 40) NOTICE OF APPEAL

- (33.) APPENDIX (DOC. NO. 41) Corrected Judgment
- (34.) APPENDIX (DOC. NO. 42) ORDER
- (35.) APPENDIX (DOC. NO. 43) order Denying COA
- (36.) APPENDIX (DOC. NO. 44) order Form Paupis
- (37.) APPENDIX (DOC. NO. 45) APPEAL to U.S.
Court of APPEALS
- (38.) APPENDIX Extension granted from
U.S. Supreme Court
- (39.) APPENDIX APPEARANCE of Counsel
- (40.) APPENDIX order from the Courts of
APPEALS order For File and Records
- (41.) APPENDIX order from Court of APPEALS
Motion on Form 9 PAUPIS
- (42.) APPENDIX RE From Court of APPEALS
of the United States
- (43.) APPENDIX RE From Court of APPEALS
of the United States
- (44.) APPENDIX Responses For Hearing
- (45.) APPENDIX U.S. District Court
- (46.) APPENDIX U.S. District Court
- (47.) APPENDIX of the United States Court
of APPEALS for the Eighth Circuit For Writ
- (48.) APPENDIX of the United States
Court of APPEALS For Eighth Circuit
CASE APPEAL to panel

IN THE UNITED STATE Supreme Court

TERRY A. LEE

V. CASE NO. 19A539

WENDY KELLEY, Director

ARKANSAS Department of Correction

REASON FOR GRANTING THE PETITION

Review(DOC. NO. 2, 22, 25, 26, 27, 28, 29, 30, 31, 32, 38) Argument 1

INEFFECTIVE ASSISTANCE OF COUNSEL SIXTH

Amendment IMPOSE ON Counsel duty to INVESTIGATE BECAUSE REASONABLY EFFECTIVE ASSISTANCE MUST BE BASE ON PROFESSIONAL DECISIONS AND INFORMED legal choices

can be made AFTER INVESTIGATION OF OPTIONS Counsel supposed to

Investigate each line substantially BEFORE making a strategic choice ABOUT WHICH LINES TO RELY ON

At trial BECAUSE Counsel failed to REASONABLY INVESTIGATE THE FACTS VISIT CRIME SCENE, TAKE PICTURES

INTERVIEWING WITNESSES OR DEFENDANT MAKE IT OBVIOUS THAT Counsel didnt INVESTIGATE THE FACTS OF LAW ABANDON MY BEST INTERESTS PERFORMANCE WAS DEFICIENT STRICKLAND V.

Arg 1

WASHINGTON 466 U.S. 668 (1984)

trial Counsel Failure to Investigate
Allege victims Reputation For truth
fulness Amounted to ineffective
Assistant of Counsel William v.

WASHINGTON 59 F.3d 673 (7th Cir 1995)

Defense counsels fail to investigate
state, Forensic Evidence fell below
An objective standard of reasonable
ness MADDOX v. Lord 818 F.2d 1058
(2nd Cir 1987) trial Counsel Failure to

~~Interview~~ Conduct pretrial
Investigation Interview witness other
than the defendant constituted
ineffective Assistant of Counsel. McQueen

v. SWENSON 498 F.2d 207 (8th Cir
1974) trial Counsels Investigation
which constituted solely of reviewing
the Investigating File of the
Prosecuting Attorney constituted

Ineffective Assistance of Counsel
THOMAS v. LOCKHART 738 F.2d
304 (8th Cir 1984) Counsel

Fail to Interview victim to
Assess their version of facts
constituted Ineffective Assistant
of Counsel, Counsel fail to

Arg 2

Interview victim to Assess there
version of Facts constituted

INEffective Assitant of Counsel

Thomas v. Lockhart 738 F.2d
304 (8th Cir 1984) trial Counsel

Failure to Investigate Charge Against
defendant constitute INEEffective

Assitant of Counsel Counsel Failure
to Investigate Evidence which
demonstrated his client Factual
Innocence under mines the Confidence
in the verdict constitute INEEffective

Counsel, trial Counsel failure to Hire
AN Investigator to track down

Potential witness who was A key
witness to my Innocence witness

NAME Arthur Roberson who describe
A different suspect than victims

Amounted to INEEffective Assitant of
Counsel House v. BALK com 725 F

2d 608 (11th Cir 1984) by Counsel
not Investigating the CHain of

Custody or IF the Evidence was
tamper with on where the Bullets

shells came from All the PHotos of
the crime scene was lost (Doc. no 20
Add 51 And 52)

Arg 3

How Ineffective Assistant of
Counsel Counsel deficient performance
deprive defendant to a fair trial
CALIFORNIA v. TRUMBETTA 467 U.S.
479 Johnson v. Morris 999
F. SUPP. 1256 (E.D. ARK 1998)

trial Counsel was Ineffective Assistant
of Counsel fail to Investigate and
Consult with defendant about the
facts of moving for suppression
of Identification testimony
Constitute Ineffective Assistant of
Counsel Counsel failure to Adequately
Arguer the motion for suppression
of evidence About the single
photo was taken of defendant
Before He was place in the photo
line up After the illegal Arrest
in violation of 4th Amendment
probable Cause. trial Counsel
willingness to Accept the Govern
ment's versions of Facts and
Failed to file Any motion
because He relied on the govern
ment versions of Facts and
not on His own reasonable
Investigation calls Counsel
Arg 4

representation in serious question
OF INADEQUACY *U.S. v. Mates* 905
F. 2d 30 (2nd Cir 1990)

COUNSEL WAS INEFFECTIVE by fail to
Investigate A False Report From the
prosecutor, WHICH STATE pursuant to
ARK. CODE ANN. SECTION 12-27-113, THE
Following constitutes A Report of the
Attending Circumstances of the offenses
OF WHICH THE ABOVE DEFENDANT IS CONVICTED
WHICH stated on 11-2-09 defendant
shot 1 victim who was outside the
home this false statement and evidence
suppose to support the charge attempt 1st
degree Battery WHEN nobody was
shot PERIOD in case by counsel allowing
False Report show deficient

performance and fell below objective
of Reasonableness violate defendant
Due process 14th Amendment *U.S. v.*

Pugliese 805 F. 2d 1117, 1123 (2d
Cir 1986) Counsel was ineffective
Assistant of Counsel in violation of
6th Amendment by not Investigating

the picture of the Street and the
House and the light pole counsel
did not come up with A Adequate

Arg 5

defense by counsel not Investigating
prosecutor was Allowed to use the
Above Evidence As A part of there
defense. If counsel would Have
Investigated the photo of the House
could Have prove defendant Innocence
cause the picture of the House
didn't show A bullet Hole in the
window sill which defendant was
charge Terroristic Act and 4
Aggravate Assaults Counsel Has A
duty to bear such skill and
knowledge As will render the
trial A reliable Adversarial
testing process Powell v Alabama
287. U.S. At 68-69, 53 S.Ct At
63-64 Counsel violated 6th

Amendment, Ineffective of
Assistant Counsel by fail. to object
to the Evidence Added At trial
in violation Arkansas Rules of
Criminal procedure 5.17.1 prosecuting
attorneys obligation (A) subject to
the ~~prosecuting~~ provision of Rule 17.5
and 19.4 the prosecuting Attorney
shall disclose to the defense counsel
upon timely request the following

Arg 6

MATERIAL AND INFORMATION WHICH
IS OR MAY COME WITHIN THE
POSSESSION CONTROL OR KNOWLEDGE
OF THE PROSECUTING ATTORNEY,
DOCUMENTS ADDED A LIGHT POLE

EVIDENCE TO SHOW THE JURY A LIGHT
COULD HAVE BEEN ON BY VICTIM HOUSE

SHOWING IT WAS POSSIBLE FOR
WITNESS TO SEE BUT NOT SHOWING THE
LIGHT JUST THE POLE. COUNSEL

FAIL TO OBJECT TO THE PICTURE OF
THE HOUSE THAT THE PROSECUTOR

ADDED AS EVIDENCE DURING TRIAL
THE PICTURE WAS GOOGLE 2011 TO
2012, ITS EVEN WRITTEN ON THE

PICTURE OF THE HOUSE THE PICTURE
OF HOUSE COULD PROVE DEFENDANT

INNOCENCE BECAUSE IN THE PICTURE
A BULLET HOLE IS NOWHERE WHERE
DEFENDANT COULD HAVE POINTED
IT OUT TO THE JURY COUNSEL

FAILURE TO OBJECT DENIED DEFENDANT A

FAIR TRIAL WHEN COUNSEL PASSES
OVER CLEARLY IN ADMISSABLE EVIDENCE

WHICH IS PREJUDICIAL TO DEFENDANT
HAS NO STRATEGIC VALUE AND

CONSTITUTES INEFFECTIVE ASSISTANCE OF

ARG 7

Counsel Lyons v. McCater 770
F.2d 529 (5th Cir 1985)
Brady v. Maryland

trial Counsel was ineffective
Assistant of Counsel trial Counsel
Failure to present a coherent
Argument to the Judge Jury base
ON DEFENSE OF Police Fabrication
rendered defendant trial Fundamentally
UNFAIR AND UNRELIABLE AND Constituted
Ineffective ~~Ford~~ Teleda v,

Dubois 142 F.3d 18 (1st Cir 1998)
trial Counsel was ineffective

Assistant of Counsel trial Counsel
Allowed the Prosecutor to use
A Discriminating Pattern in select-
ing the Juror prosecutor select
mostly women Jurors so she can
play off there emotion Instead
of the Evidence cause Erica Brown
A Female was the key witness
v.s. MARTINEZ - SALAZER v.s.

ARIZ (2000) Counsel constituted
ineffective Assistant of Counsel

Counsel error by keeping A Juror
WHO STATED ON RECORD SHE WAS
Arg 8

going to believe Everything the
prosecutor, Police and witnesses
SAY Counsel Fail to Strike this
Juror stated it was part of
His defense. Government of Virgin
Island v. Forte 865 F.2d 59
(3rd Cir 1989) Counsel defense
prejudice and deprive defendant
A Fair ~~to~~ trial by allowing A
Bias Juror lead to defendant
guilt Counsel knew this Bias Juror
could Effect trial ~~and~~ denied
petitioner A Fair trial And Juror
Tackett v. State 284 Ark 211
680 MUMIA V. VIRGINIA 500
U.S. 114 L.Ed 2d 493 L.Ed 2d
493, 111 S.Ct — (1991) Your dive
enable Court to select Impartial
~~duty~~ Jury And Assit Counsel in
exercising PERemptory CHallenges.
Counsel was INEFFECTIVE Assitnant
OF Counsel by error keeping A
Juror WHO NAME WAS NOT ON
the Jury list ANIETHIR Female WHO
Counsel HAD NO INFORMATION ON
AND Refuse to object or Strike Her
this prejudice defendant to A
Arrog 9

Fair trial Counsel was ineffective
Assistant of Counsel by keeping
A white female who stated she
work with Eric Brown the key
witness and knew her Counsel
fail to strike her which
prejudice and deprive defendant
A Fair trial. ~~Gearing~~ Smith
V. Gearing 888 F.2d 1334
(11th Cir 1990) Counsel violated
6th Amendment Ineffective
Assistant of Counsel for failure to
file the motion for direct verdict
According to His professional
of the evidence fail to show
insufficient evidence that the
state couldn't prove no element
of the charge offenses of
5-13-310, 5-3-201 and 5-13-~~310~~
- 204 no proof was describe,
nor was there any proof of
the charges to charge defendant
Cause of Counsel error petitioner
was denied A Fair trial cause
trial Judge denied it cause it
was not properly filed which
could prove defendant was
Arg 10

INNOCENCE OF ALL CHARGES AND
IF trial Court Had the proper
motion Filed THE Court AND THE
Court OF Appeal would be able
to review the Evidence. IF
Counsel would Have proven the
Essential Elements OF the CHARGE
WAS NOT proven, OFFENDERS
motion would Have been granted

A. Standard Review it is
well settled that the Court
treats A motion For direct
Verdict As A CHALLENGE to the
SUFFICIENCY OF THE EVIDENCE
see William v. State 338 ARK 178
183 992 S.W. 2d 89, 931 (1999)
THE Standard OF THE EVIDENCE in
the light most FAVORABLE to
THE State AND Consider ONLY
EVIDENCE THAT Support the Verdict
Bell v. State 371 ARK. 375, 381,
266 S.W. 3d 696, 701 (2007)

FURTHER move THIS Court will AFFIRM
Verdict IF THERE is Substant-
ial EVIDENCE to Support it

I. D. Substantial Evidence is
Evidence that WHICH is SUFF

Arg 11

SUFFICIENT FORCE AND CHARACTER
THAT IT WITH REASONABLE
CERTAINLY COMPEL A CONCLUSION
ONE WAY OR ANOTHER WITHOUT
RESORTING TO SPECULATION OR
CONJECTURE *Id.* *ROUNSAVILLE*
V. STATE 37 ARK. 359 288,
S.W. 3d. 213, 216 (2008) THE
CREDIBILITY OF THE WITNESSES IS
OF AN ISSUE FOR THE JURY IN
DECIDING AND NOT THE COURT

BAUGHMAN V. STATE, 353 ARK. 1, 5, 110
S.W. 3d 740, 743 (2003) THE TRIER OF
FACT IS FREE TO BELIEVE ALL OR PART OF
ANY WITNESS TESTIMONY AND MAY RESOLVE
ALL QUESTION OF CONFLICTING TESTIMONY
AND INCONSISTENT EVIDENCE *Id.* UNLESS
THE EVIDENCE DOES NOT MEET THE REQUIRED
STANDARD LEAVING THE JURY TO SPECULATION
AND CONJECTURE IN REACHING IT VERDICT
THE JURY MAY CHOOSE TO BELIEVE THE
STATE ACCOUNT OF FACTS RATHER
THAN THE DEFENDANT *Id.* AT 6, 110
S.W. 3d AT 743, YET A PROPERLY
INSTRUCTED JURY MAY OCCASIONALLY
CONVICT EVEN WHILE ABLE TO BE
SAID THAT NO TIER OF FACT COULD
ARG 12.

Find guilt beyond A reasonable
doubt JACKSON V. VIRGINIA 443
U.S. 307, 317 (1978) All testimonies
From the witnesses ERIC A and Robert
Brown, Archie Roberson All witness
gave multiple versions of
what the Assailant was wearing
According to STIPES V. STATE 315
ARK 719, 870 S.W. 2d 388 (1994)
where the victims pretrial and
in court identification of
Appellant were unequivocal
under Green v. State, 310 ARK
10 835 S.W. 2d 494 496 (1992)
the State must prove in Every
Case is that the person Accused
is the one whom the charge
and the Evidence under William
v. State, 351 ARK 215, 91, S.W. 3d. 54
(2002) AFTER A Jury has given Credence
to A witness's testimony, the Appellate
Court does not disregard it unless
it was so inherently Improbable,
Physically impossible, or so clearly
unbelievable that reasonable mind
could not differ there on. What
makes MS Brown testimony so clearly
Arg 13

unbelievable In Addition ther
multiple Versions of what the
Assailant WAS WEARING BOTH ERICA
AND Robert Brown State Found out by
Word ON THE Street state proof
ON Identification of Mr. Lee As the
Assailant Left the Jury to speculate
Counsel violated 6th Amendment
Ineffective Assitant of Counsel Counsel
error by not objecting once the
Jury return guilty verdicts the
Counsel should have move the trial
Court to limit the Judgement of
Conviction to one CHARGE Counsel
Allowed defendant Constitutional
right get violated 5th Amendment
Double Jeopardy Also ARK Con't, Art
2 ~~sect~~ Section 8 And in the violation
A.C.A. 5-1-140 Flower V. Larry Norris
Director, ARKANSAS Department of
Correction 347 Ark. 760, 68 S.W 3d
289 (2002) MURPHY v. Puckett
893 F.2d 94 (8th Cir 1990) trial
Counsel failure to raise valid Issue
of double Jeopardy Constatute
Ineffective Assitant of Counsel
Jackson v. Leonard 162 F.3d 81
Arg 14

(2th Cir 1998) Counsel Failure to
raise double Jeopardy on same
Factual Charges U.S. v. McDonald
981 F. Supp. 942 (D Md 1997)

Argument 2.

THE ARKANSAS supreme Court Decision
WAS UNREASONABLE CAUSE A CONVICTION OF
ACCUSED PERSON WHILE HE IS legal
INCOMPETENT violate due process A.C.A.
5-2-302 U.S.C 14th Amendment
THE ARKANSAS supreme Court Went Against
their own ruling on CASE: LEE
DVANE JACOBS v. STATE OF ARKANSAS
NO. CR-87-88 WHICH STATE: THE
PSYCHIATRISTS two Hour Interview
resulted in A Report stating that
petitioner competency to stand trial
is HIGHLY questionable, that report
RAISED A reasonable doubt about
petitioner competency to stand trial
AT the time. THE trial Court SHOULD
HAVE ordered A Full examination
AND report pursuant to ARK. CODE
ANN. 5-2-305 (c) (1987) ARK. STAT.
ANN. 41-605 (3) AND IF WARRANTED BY
THE report conduct A determination of
Fitness to proceed see ARK. CODE ANN.
Arg 15.

5-2-309 (1987) ARK STAT, ANN 41-606
Repl (1977) THE Failure to do so
constitutes reversible error the Arkansas
supreme court Refuses to Acknowledge
this by the Circuit Court two Hour
Interview Cause reasonable doubt on
Petitioner Competency and constitutes
reversible error THE Circuit Court
And THE ARKANSAS supreme Court
Went Against there Ruling they
Already made And law of state
And Federal law THE Copies
of Mental Evaluation Add 77 Add 78
A Competency Hearing Should Have
been Held on Petitioner Competency
to stand trial Pate v. Roberston
383 U.S. 375, 86 S. Ct 836, 15 L. Ed
2d 815 (1966) THE ARKANSAS supreme
Court Failure to Consider MR Lee was
Administered the Reading subtest of
THE WRAT-4 He obtained A standard
score of 78 placing Him at the
7th Percentile for Individuals
His Age His score places Him at
the 5th grade reading level His
intelligence Falls within the low
Average range of intellectual

Arg 16

Function And results of this
Evaluation Review Andrew JASSER
V. RAY HOBBS Director, ARKANSAS
Department of Correction NOS. 02-3103,
11-3346 NOV. 14 2012 ALSO THEY
Fail to take Mental Health medication
to sleep And ANY Consideration of there
Ruling.

ARGUMENT 3

PETITIONER HELD UNLAWFULLY AGAINST
THE CONSTITUTION LAWS, OF TREATIES OF
THE UNITED STATES. PETITIONER DUE
PROCESS 14TH Amendment WAS VIOLATED
PETITIONER IS BEING HELD IN THE
ARKANSAS Department OF Correction
WITH OUT THE LAWFULL AUTHORITY
THE SENTENCING COURT LACK JURISDICTION
OVER SUBJECT MATTER AND THE JUDGE
MENT. AND COMMITMENT ORDER IS
INVALID ON ITS FACE, ^{AND} VOID
CONVICTION per Administrative
Order 2, 4. AND 16, A.C.A. 40-1,
A.C.A. 16-112-103 RENSLOW V.
LARRY NORRIS, Director, ARKANSAS,
Department OF Correction NO. CR 97-
1074 CASE ORIGINALLY ASSIGNED TO
FOURTH DIVISION Judge Herbert

Arg 17

WRIGHT A motion was filed for Recusal Judge Wright stated from the Bench He will recuse but never Reduce it to written notifying the Clerk off Record my case was illegal given to SEVENTH Division Judge Barry Sims where I was convicted and sentence. A.C. A 16-112-103 in pertinent part provides (A) THE writ of Habeas Corpus shall be granted forth with Any person who shall apply for by petition showing by Affidavit or other Evidence probable cause to believe He, is detained without lawful Authority Even IF AN APPEAL is Available petitioner, Certorari, in a Court Having Supervisory Jurisdiction would still lie to quash a Judgement which is void on its face. The general rule is that a Judgement enter without Jurisdiction of the person or the subject matter or in excess of the Court is void West v. Bolin 314 Ark. 40, 858. S.W. 2d, 97. (1993) Division State Et Rel Attorney General Et AL v. MARTINEAU Arg. 18

CHANCELLOR NO. 52 JUNE 20 (1921)
THE INQUIRY IN HABEAS CORPUS
PROCEEDING TO PRODUCE THE DISCHARGE
OF ONE HELD UNDER PROCESS ISSUED
BY A COURT IS CONFINED TO THE
FACE OF THE PROCESS OR JUDGEMENT
UNDER WHICH THE PRISONER WAS
HELD AND THE JURISDICTION OF THE
COURT BY WHICH THE PROCESS WAS ISSUED

ARGUMENT 4

PETITIONER HELD IN THE ARKANSAS
DEPARTMENT OF CORRECTION WITHOUT
LAW FULL AUTHORITY PETITIONER WAS
ILLEGALLY DETAINED AND HAVEN'T BEEN
RELEASE FROM THE DETENTION THERE WAS
NO PROBABLE CAUSE FOR THE ARREST IN
THE VIOLATION OF 4TH AMENDMENT
THE REASONABLE CAUSE WARRANT UNDER
ARK COURT RULES 7.1 WAS ONLY SIGNED
BY THE DETECTIVE THE SPOTS WHERE
THE JUDGE AND COURT CLERK WAS
BLANK ALSO I WAS DENIED A
PROMPT APPEARANCE JUDGE STATE HE
DID NOT WANT TO SEE ME, ARK
COURT RULE 8.1. GERSTEIN V. ROBERT ET
AL NO. 73-477 ARGUED MARCH 25, 1974
REARGUED OCT 21, 1974 DECIDED FEB 18 (1975)
ARG 19. I'M HELD IN VIOLATION

OF THE 14TH Amendment Due process
A PERSON CANNOT INCUR THE LOSS OF
LIBERTY THAT A TOTAL WANT OF EVIDENCE
TO SUPPORT A CHARGE Due process
REQUIRES THAT NO PERSON BE MADE TO
SUFFER THE EVILS OF A CRIMINAL
CONVICTION EXCEPT UPON SUFFICIENT
PROOF, DEFINED AS EVIDENCE NECESSARY
TO CONVINCE A TRIER OF FACT BEYOND
REASONABLE DOUBT OF THE EXISTENCE
OF EVERY ELEMENT OF THE OFFENSE
JACKSON V. VIRGINIA 443 U.S. 307 99
S. CT 2781, 61 L. ED. 2D 560 (1979)

PETITIONER IS CONVICTED ON TERRORISTIC
ACT 5-13-310 WITHOUT SUFFICIENT PROOF
TO SHOW THE HOUSE BEEN HIT NOR WITH THE
INTENTION OF THE CRIME NAME ELEMENT
PROVEN NOR FOR THE 4 AGGRAVATED
ASSAULTS A.C.I.A 5-13-204 FROM THE
SAME ONE BULLET FOR THE TERRORISTIC ACT
NAME ELEMENT WAS PROVEN ON THE
ATTEMPT TO COMMIT BATTERY IN THE
FIRST DEGREE BATTERY ARK. CODE ANN.
5-13-204 ITS INSUFFICIENT EVIDENCE
ON ALL CHARGES THE BATTERY CHARGE
AND THE OTHER CONTRADICT EACH OTHER
I CAN'T BE COMMITTING CHARGES AT THE
Arg 20

same time cause the elements of the charges. Also petitioner denied a fair and impartial trial in violation of Due process 14th Amendment from the juror and the juror panel. Maliciously prosecuted prosecutor added a false report in trial like somebody been shot when nobody was shot in case.

Argument 5.

Judge Barry A Sims 7th Division Abuse his Discretion in Refusing without Reason to Instruct the Jury on Concurrent and Consecutive Sentences in violation of Due process 14th Amendment Appellant asks for the Concurrent Consecutive Jury Instruction below, and the trial court flatly denied it without exercising discretion. During Deliberation the Jury sent a note asking about Concurrent sentence thus there is prejudice. Ark. Code Ann. 5-4-403 explain Concurrent and Consecutive Sentence which state multiple sentence

Arg 21.

Run Concurrent unless on the
Judge's motion THORNBERRY V.
STATE, 102 Ark. App. 17, 18-19, 279 S.W.
3d 489, 490 (2008)

Argument 6

THE JURY FORMS INCONSISTENT AND
UNCONSTITUTIONAL THAT PREJUDICE
DEFENDANT TO A FAIR TRIAL THE FOUR
JURY INSTRUCTION FORMS WAS MIS
LEADING AND ILLEGAL. THE JURY
INSTRUCTION FORMS NO. 19 AMCI 2d 8301,
NO. 8 AMCI 2d 9312 VF, NO. 21
AMCI 2d 8301-VF THE JURORS FINDING
DEFENDANT GUILTY WITHOUT A NAME
OF A VICTIM ON THE JUROR FORMS ON
THE CHARGES OF TERRORISTIC ACT AND
THE ATTEMPT BATTERY IN THE 1ST DEGREE
ON ALL THE AGGRAVATE ASSAULT CHARGES
IT HAD VICTIMS NAMES ON THERE
JUROR FORMS THIS DENIES PETITIONER
DUE PROCESS 14TH AMENDMENT
WILLIAM A SANDERS V. ZETTIE
COTTOM NO. 03-2622 Argued
JUNE 16, 2004 Decided JAN 31,
(2005)

Argument

PETITIONER HELD IN THE VIOLATION

Arg 22

OF ARKANSAS RULES OF CRIMINAL
PROCEDURES 17.1, 17.3, 19.1, 19.2
19.6. et requires the prosecutor
to disclose all evidence also
prosecutor misconduct. At trial
prosecutor added photos of the
house, bullet shells and the light
poll and a false report stating
petitioner shot 1 of the victim
outside the home when nobody
was shot this violate Brady v.
MARYLAND 373 U.S. 83, 87 (1963)
Due process required disclosure
also U.S. v. Puglise 805 F.2d 1117,
1123 (Cir 1986) Due process
14th Amendment violation being
convicted off mis information,
untrue evidence

Argument

PETITIONER IS HELD prior to sentencing
trial court fail to afford a right
to allocution as provided Ark.
Stat. Ann. 43-2303 Repl (1977)
proceeding before pronounce Judge
ment when the defendant appears
for judgement he must be informed
by the court of the indictment

HIS PLEA AND VERDICT THERE ON IF
ANY AND THEY MUST BE AS IF HE
HAS ANY LEGAL CAUSE TO SHOW WHY
JUDGEMENT SHOULD NOT BE PRONOUN
CED AGAINST HIM (Tex. Cr. App. 1992)
Bester v. Johnson 9 A.O. 2d 827, 192
N.Y. S. 2d 947 (1959) VALDEZ v. STATE
479 S.W. 2d 927 THIS VIOLATE
DUE PROCESS 14th AMENDMENT.

Argument

PETITIONER DUE PROCESS OF THE 14th
AMENDMENT WAS VIOLATED BY THE
ARKANSAS COURT OF APPEALS, THE
ARKANSAS SUPREME COURT, THE
MAGISTRATE JUDGE JUDGE DEERE AND
THE DISTRICT COURT JUDGE KRISTINE
G. BAKER BY AFFIRMING MY CONVICTION
OF MISINFORMATION BY STATING
LEE THREATENED TO RETURN AND KILL
EVERYBODY IN THE HOUSE AINT NO
EVIDENCE NO WHERE THAT STATE THIS
U.S. v. PUGLIESE 805, F.2d 1117, 1123
(2nd Cir 1986)

Argument

PETITIONER HELD IN VIOLATION OF DUE
PROCESS 14th AMENDMENT BY THE
Arg 24

ARKANSAS Supreme Court July 21,
2016 Remand Case to the Circuit
Court For Additional Findings of
Fact And to settle the Record.

lower Court Refuse to Respond
timely the Supreme Court stated
they did cause petitioner file
motion for Reversal and dismissal
which should have been granted
the Circuit Court didnt do

Additional Finding of Facts to All
Other Claims of Ineffective Assistant
of Counsel or Independent Claim
on the motion for direct verdict
Argument

petitioner EIGHT Amendment was
violated threw the Hole process

From the illegal Arrest no bond
the Judge State He do not want to

see me violate prompt Appearance,
maliciously prosecution, A punishment
that Amounted to torture, grossly,
excessive, in Herently unfair.

Mental Abuse As well physical
Abuse And Spiritually Abuse Evidence
File District Court Doc NO. 2, 22, 25, 26,
27, 28, 29, 30, 31, 32, 38 No Investigat-
Arg 25

ion on any matter within the
Arkansas systems not of the
Crime not of the Incarceration
unlawful detain several
different type of was.

wrongful conviction, false
imprisonment no protection
of Human Rights, Rig Toror
convicted in the wrong Court
Room enhancement sentences.

CONCLUSION

1. Reverse And Remand new trial for
INEFFECTIVE ASSISTANT OF COUNSEL
2. Reverse AND Dismissed on counts
subject to double Jeopardy
3. Reverse AND Dismissed on Insufficient
EVIDENCE
- 4 This Court Declare petitioner
sentence AND Conviction is void
5. new trial AND ANY AND ALL relief
the court deems Just AND proper

Respectfully submitted

Tyler

E. A. R. V.

P.O. Box 970

MARIANNA ARK 72360

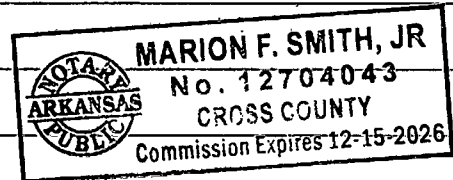
Arg 26.

VERIFICATION

I TERRY LEE the PETITIONER Herein
AND support of my writ of Certiorari
PETITION AFTER First being duly sworn
do Hereby swear that the statement,
matters, AND things Contained in my
Writ of Certiorari petition are a true
AND Accurate Account to the best of my
Knowledge Information, AND for the
Purpose Herein Stated set forth AND
Contained.

Terry Lee 12-01-60
Pro se

STATE OF ARKANSAS
County of Lee



Subscribed AND sworn To Before me A
Notary Public on this 26 day of January
2020

M. F. Smith, Jr.
Notary Public

my Commission Expires: 1-26-2020

CERTIFICATE OF SERVICE

I TERRY LEE HAS served day of 2-12-2020
2020 to Leslie Rutledge Attorney
General, 323 Center Street, Suite 200
Little Rock ARK 72201 by place same
in the U.S. Mail with sufficient
Postage Affixed to ensure Delivery

Aug 27

Terry Lee Pro se