

No. 19-7973

**ORIGINAL**

IN THE

SUPREME COURT OF THE UNITED STATES

Quincy Chisolm — PETITIONER  
(Your Name)

vs.

State of Maryland — RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

Court of appeals of Maryland  
(NAME OF COURT THAT LAST RULED ON MERITS OF YOUR CASE)

PETITION FOR WRIT OF CERTIORARI

Quincy Chisolm  
(Your Name)

Patuxent institution  
(Address)

Jessup md 20794  
(City, State, Zip Code)

Supreme Court, U.S.  
FILED

**DEC 12 2019**

OFFICE OF THE CLERK

(443) 438 - 6489  
(Phone Number)

RECEIVED  
**DEC 18 2019**  
OFFICE OF THE CLERK  
SUPREME COURT, U.S.

**QUESTION(S) PRESENTED**

1. Did the trial court err in failing to instruct the Jury that a conviction on the count of Conspiracy to murder would be for Conspiracy to commit murder in the first degree?
2. Did the trial court sentence Mr. Chisolm to an illegal sentence under Maryland Rule 4-345.

## **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:

## TABLE OF AUTHORITIES CITED

### CASES

### PAGE NUMBER

Allen v United States  
169 U.S. 472 (1896)

Thompson v State 371  
Md 473 (2002)

State v Hutchinson 287  
Md 198 (1980)

Black's Law Dictionary 79 (6th ed  
(1990))

### STATUTES AND RULES

Md Ruls 4-345

Md Ruls 8-605 B-5

### 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 \_\_\_\_\_ 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 is unpublished.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 \_\_\_\_\_ 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 is unpublished.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 is unpublished.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 \_\_\_\_\_.

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 8-22-16. A copy of that decision appears at Appendix \_\_\_\_\_.

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

1. The 14<sup>th</sup> amendment of the US Constitution

8<sup>th</sup> amendment of the US Constitution

## STATEMENT OF THE CASE

a jury in the circuit court for Baltimore city convicted anthony rouch and Quincy chisolm, the appellants, and Robert Moore of conspiracy to murder alex venable, his family members and their associates. The court sentenced chisolm to life imprisonment, all but 40 years suspended, with a mandatory 5 years supervised probation upon release, for conspiracy to commit murder.

## REASONS FOR GRANTING THE PETITION

1. The court of special appeals opinion was in conflict with the court of appeals prior alter charge Jurisprudence .
2. petition was illegally Sentence to a charge that wasnt the verdict of the Jury ,
- 3 . The Trial Courts was in error for failing to sever the indictments

## **CONCLUSION**

The petition for a writ of certiorari should be granted.

Respectfully submitted,



Date: \* 11-27-19