

No. 19-8086

IN THE  
SUPREME COURT OF THE UNITED STATES

RANDY DALE JACKSON

(Petitioner)

TOMMY <sup>v.</sup> TAYLOR, <sup>(MDOC)</sup> Interim Commissioner (Respondent)

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CERTIFICATE OF A PARTY UNREPRESENTED  
BY COUNSEL. Under Rule 44.2

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I, Randy D. Jackson prose, certification that it is  
restricted to the grounds specified in this Paragraph  
Rule 44.2 and that it is presented in good faith and  
not for delay; word limits 3000; excludes case law notes  
I declare under penalty of perjury that the foregoing is true  
and correct. 28 U.S.C. § 1746  
This the 8 day of June, 2020.

Respectfully Submitted,

/s/ Randy D. Jackson  
Pro Se Petitioner

**INDICTMENT**

STATE OF MISSISSIPPI

VS.

RANDY DALE JACKSON

**INDICTMENT FOR THE OFFENSE OF  
MURDER, MISS. CODE ANN. §97-3-19**

STATE OF MISSISSIPPI  
COUNTY OF MADISON



CAUSE NO. 3148

DEFENDANT

**IN THE CIRCUIT COURT OF SAID COUNTY, MARCH TERM, 1997  
RECALLED MAY 21, 1997**

The Grand Jurors of the State of Mississippi, taken from the body of good and lawful citizens of said county, elected, summoned, empaneled, sworn and charged to inquire in and for the body of the said county aforesaid, at the term aforesaid of the Court aforesaid, in the name and by the authority of the State of Mississippi, upon their oath present that,

**RANDY DALE JACKSON**

late of the county aforesaid, on or about the 11th day of May, 1997, in the county aforesaid and within the jurisdiction of this court,

did willfully, unlawfully, knowingly and feloniously with deliberate design to cause death to a human being, kill Henry Jackson, a human being, by shooting him with a gun, in Camden, Madison County, Mississippi, in violation of Mississippi Code Annotated § 97-3-19 (1972), as amended,

against the peace and dignity of the State of Mississippi.

Endorsed: A True Bill

  
FOREMAN OF THE GRAND JURY

  
DISTRICT ATTORNEY

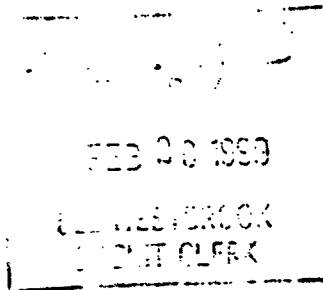
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IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

STATE OF MISSISSIPPI

VS.

RANDY DALE JACKSON



CAUSE NO. 3148

DEFENDANT

The Defendant, Randy Dale Jackson, has been charged by indictment in this case with the crime of murder. If you find from the evidence in this case, beyond a reasonable doubt that the Defendant, Randy Dale Jackson, on or about May 11, 1997, in Madison County, Mississippi, did

1. willfully and with deliberate design to effect the death of Henry Jackson,

2. kill Henry Jackson by shooting him with a shotgun,

~~then you shall find the defendant, Randy Jackson, guilty of Murder.~~

If the State has failed to prove any one or more of the above listed elements, beyond a reasonable doubt, then you shall find the Defendant not guilty of murder.

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IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

STATE OF MISSISSIPPI

VS.

RANDY DALE JACKSON

FEB 20 1980

CLERK

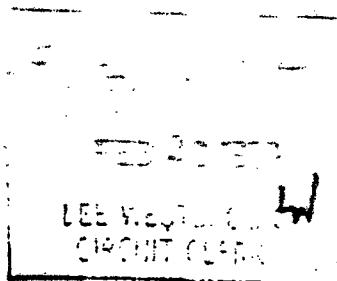
CAUSE NO. 3148

DEFENDANT

INSTRUCTION NO. C-2

The law presumes every person charged with the commission of a crime to be innocent. This presumption places upon the State of Mississippi the burden of proving the Defendant guilty of every material element of the crime with which he is charged. Before you can return a verdict of guilty, the State must prove that the Defendant is guilty beyond a reasonable doubt. The Defendant is not required to prove anything.

we the Jury find the Defendant  
Randy Dale Jackson Guilty of  
Murder



#3148  
STATE V JACKSON  
2-23-99

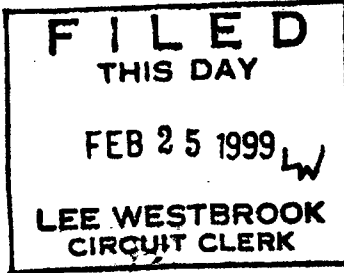
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IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

STATE OF MISSISSIPPI

VS.

RANDY DALE JACKSON



CAUSE NO. 3148

DEFENDANT

**FINAL JUDGMENT OF CONVICTION**

THIS CAUSE having come on for trial on February 22, 1999, during the February term of this Court, and continuing through February 23, 1999, and the Defendant, Randy Dale Jackson being represented by Ray Charles Carter, Esq., and the State of Mississippi being represented by Tommy Savant and William E. Chapman, III, Assistant District Attorneys, and both parties having announced ready for trial, issue hereby being joined, a jury composed of good and lawful citizens of Madison County, Mississippi, being duly qualified for jurors in this cause, having been selected by the parties to serve as jurors in this cause, said jury being empaneled according to law, and the Court and jury having then heard evidence and argument of counsel by both parties, and the Court then having instructed the jury according to law, and the jury having retired to consider its verdicts;

WHEREUPON, the jury having in due course rendered and announced its verdicts unto the Court as follows:

"We, the jury, find the Defendant guilty of Murder as charged in the indictment."

WHEREUPON, the jury having been duly polled and asked the verdict having been found to be unanimous.

IT IS, THEREFORE, ORDERED AND ADJUDGED, that, upon the verdict of the jury, the Defendant, Randy Dale Jackson is guilty of the crime of Murder as charged in the Indictment in this cause.

IT IS FURTHER ORDERED AND ADJUDGED that the Defendant, Randy Dale Jackson, is hereby sentenced in this cause to Life Imprisonment.

SO ORDERED AND ADJUDGED this the 24<sup>th</sup> day of February, 1999.

SPECIAL CIRCUIT COURT JUDGE

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI  
STATE OF MISSISSIPPI

V.

RANDY DELL JACKSON

FILED  
THIS DAY

FEB 26 1999

LEE WESTBROOK  
CIRCUIT CLERK

CAUSE NO. 3148

**MOTION FOR NEW TRIAL**

COMES NOW, Randy Jackson, and files this his Motion for a New Trial. In support hereof, Randy Jackson, set forth the following errors, to wit:

1.

That the verdict was against the overwhelming weight of the evidence..

2.

That the State improperly used its peremptory challenges to strike black jurors from the panel.

3.

That the jury was improperly instructed as to the meaning of " Deliberate Design, Malice aforethought and Heat of Passion".

4.

That the shotgun and photographs were used to prejudice the jury although objected as having greater prejudicial effect than probative value.

Respectfully submitted this the 26th day of February, 1999.

RANDY DELL JACKSON

BY:

Ray Charles Carter

Ray Charles Carter  
745 Highway 51, Ste. M  
Madison, MS 39110  
898-9700  
8926

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STATE OF Mississippi  
COUNTY OF Winston ) SS.

**AFFIDAVIT OF OATH**

**PERSONALLY APPEARED BEFORE ME**, the undersigned authority in and for the aforesaid jurisdiction, Winston-Chester who, after first being duly sworn, did state under oath as follows:

I, Randy D. Jackson do solemnly swear that I am a citizen of the state of Mississippi, and do hereby state that the below is true and correct.

The issue of conspiracy in case No. - USDC 3:07-CV-625.

Facts: My homicide charge likely was brought about from a part I played in a movie in 1995, A Time to Kill film in Madison County Canton, Ms. The part I played was extra as a militia teen, as me being seen throwing and falling on the grand wizard, the leader of the Ku Klux Klan. This can be proved at the Canton Convention Center and Visitors Bureau along with the 1995-96 TV footage news 48 Hours by Dan Rather interview. The reason why I have not come forward with this terrorism conspiracy of hit is because I was afraid that my family member's would be harmed or killed. The guy I shot told me that somebody had paid him to kill me. The only thing I spoke about at trial was he told me that somebody had paid him to kill me (see Tr. 167) because I was afraid.

Furthermore, I wrote the FBI in Jackson, Ms in 1998 before I went to trial about the Court Judge treating me unfair regarding my civil rights of receiving fair Justices in court of law after the revoking of my bond, due to my paid attorney's fault by misinforming me of my court date. Therefore I would kindly ask for an investigation by the FBI, into this matter of conspiracy hit by the Ku Klux Klan.

SWORN TO SUBSCRIBED BEFORE ME, this the 01<sup>st</sup> day of Feb, 2008.

Gym Alexander  
NOTARY PUBLIC

Gym Alexander (LA)  
MY COMMISSION  
EXPIRES

MISSISSIPPI STATEWIDE NOTARY PUBLIC  
MY COMMISSION EXPIRES JUNE 12, 2009  
BONDED THRU STEGALL NOTARY SERVICE